

# **Annual Report to Parliament on the**

Administration of the *Privacy Act* 

April 1, 2020 – March 31, 2021

Annual Report to Parliament on the Administration of the *Privacy Act* April 1, 2020 – March 31, 2021

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# Annual Report to Parliament on the Administration of the *Privacy Act*

# April 1, 2020 - March 31, 2021

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#### 1. Introduction

The Department of Agriculture and Agri-Food Canada (AAFC) presents to Parliament its *Annual Report on the Administration of the* Privacy Act (the "Act") for fiscal year 2020-2021 (April 1, 2020, to March 31, 2021). This report is prepared and tabled in accordance with section 72 of the Act.

The purpose of the Act is to protect the privacy of individuals with respect to personal information about themselves held by government institutions and to provide individuals with a right of access to that information.

In accordance with Treasury Board of Canada Secretariat requirements, this report provides an overview of the activities of AAFC in administering its responsibilities under the Act. This report should be considered along with AAFC's 2020-2021 *Annual Report to Parliament on the Administration of the* Access to Information Act, which is tabled separately.

AAFC's Access to Information and Privacy (ATIP) Office is the focal point for access to information and privacy matters within the Department. For fiscal year 2020-2021, AAFC responded to all formal privacy requests within the prescribed deadlines.

The Department is committed to protecting the personal information under its control and recognizes that this protection is an essential element in maintaining public and employee trust in government. AAFC continues to exercise proactive personal information management through frequent engagement with AAFC's ATIP Office and effective risk assessment.

#### 2. AAFC's mandate

*Our vision* — Driving innovation and ingenuity to build a world-leading agricultural and food economy for the benefit of all Canadians.

Our mission — Agriculture and Agri-Food Canada provides leadership in the growth and development of a competitive, innovative and sustainable Canadian agriculture and agri-food sector.

Responsibilities — The Department's activities extend from the farmer to the consumer, from the farm to global markets, through all phases of producing, processing and marketing of farm, food and bio-based products. Agriculture is also a shared jurisdiction in Canada, and the Department works closely with provincial and territorial governments in the development and delivery of policies and programs.

The Department is also responsible for making sure that policies and programs of the organizations within the Agriculture and Agri-Food portfolio are coordinated and work to serve the interests of the sector and Canadians. The portfolio partners and agencies consist of the Canadian Dairy Commission, the Canadian Grain Commission, Farm Credit Canada, the Canada Agricultural Review Tribunal and the Farm Products Council of Canada. AAFC also includes the Canadian Pari-Mutuel Agency, a special operating agency that regulates and supervises pari-mutuel betting on horse racing at racetracks across Canada.

#### 3. ATIP Office Structure

The ATIP Office is the focal point for access to information and privacy matters within AAFC. Key responsibilities include:

- Developing, coordinating and implementing policies, guidelines and procedures to ensure departmental compliance with the *Access to Information Act* and the *Privacy Act*,
- Ensuring timely processing of all ATIP requests and proactively disclosing summaries of closed ATI requests on the Open Government website;
- Providing senior management and all departmental staff with advice and guidance on ATIP-related matters, including privacy best practices and risk mitigation strategies, and offering training and awareness sessions to promote a consistent approach across the Department;
- Representing AAFC in its discussions and negotiations with external stakeholders, including other government departments (OGDs), third parties, the Treasury Board of Canada Secretariat (TBS), the Information and Privacy Commissioners of Canada, and the general public;
- Conducting Privacy Impact Assessments (PIA);
- Preparing annual reports to Parliament and maintaining the Department's *InfoSource* chapter;
- Developing and updating personal information banks (PIBs); and
- Processing requests on behalf of the following portfolio organizations: the Canadian Dairy Commission, the Canadian Grain Commission and the Farm Products Council of Canada.

The ATIP Office reports to the Director General (DG), Communications Services, under the direction of the Assistant Deputy Minister (ADM) of the Public Affairs Branch (PAB). The ADM, PAB, provides senior management support and leadership.

The team is comprised of access and privacy policy analysts who play a key compliance and risk mitigation role for the Department. Eleven positions are attributed to the Office:

- Director (1)
- ATIP Managers (2)
- Senior ATIP Policy Advisor (1)
- Senior ATI Analysts (3)
- Junior ATI Analyst (1)
- Senior Privacy Policy Analyst (1)
- Privacy Analyst (1)
- Administrative Support (1)

The cost of administering the ATIP Office (for both access to information and privacy matters as recorded in the Statistical Reports) during the reporting period was \$1,332,263 which included 12.535 full-time employees (or \$1,066,434 in salaries and \$265,829 for professional services).

The ATIP Office is supported by a designated network of 17 Officers of Primary Interest (OPIs) - holders of the relevant information identified in an access request. OPIs are responsible for coordinating branch-specific request activities and providing guidance to colleagues on the administrative processes related to the Act.

OPIs and their DGs review and make recommendations regarding the relevant information to be released prior to ATIP review and final approval. The ATIP Office continuously searches for new ways to streamline the processing of requests.

#### 4. <u>Delegation of Authority</u>

Section 73 of the *Privacy Act* provides for the Minister of AAFC to delegate the powers, duties and functions designated by the *Act*.

The delegation of authority for the administration of the *Privacy Act* includes the Assistant Deputy Minister, PAB, the DG, Communications Services, and the ATIP Director, who have full delegated authority to approve exemptions under the *Access to Information Act* and the *Privacy Act*, in accordance with the delegation of authority instrument approved by the Minister in October 2020. The DG and the ATIP Director are also authorized to make decisions regarding other privacy matters, such as the disclosure of personal information without consent in accordance with subsection 8(2) of the Act and registering new personal information collections in accordance with section 10. Certain administrative functions are also delegated to the ATIP Managers to enhance efficiency in request processing.

The delegation of authority instrument for the administration of the *Privacy Act* is appended hereto at Annexes A and B.

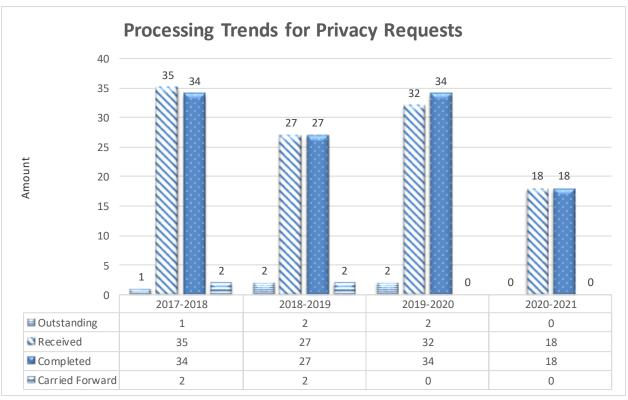
#### 5. Interpretation and trends of the *Privacy Act* Statistical Report

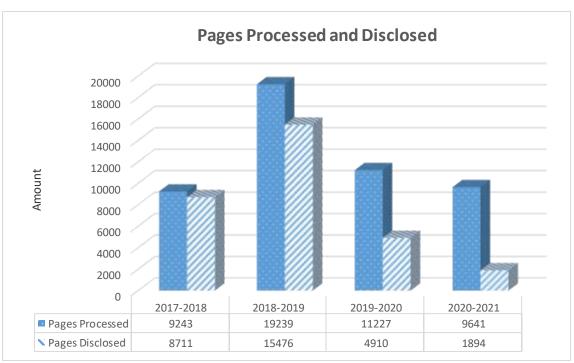
Annual statistical reporting on the administration of the Act was first conducted in 1983. Since 2011-2012, government institutions have completed more in-depth statistical reporting forms on the administration of the *Act* as prescribed by the Treasury Board Secretariat (TBS). The detailed statistical report on the *Privacy Act* for 2020-2021 is provided in Annex C.

#### Privacy requests received and completed

The ATIP Office received 18 new requests under the *Privacy Act* in 2020-2021, and processed 9,641 pages, of which 1,894 or 20% were released entirely or in part. Of the eighteen requests completed, 11.1% were "all disclosed" and 55.5% were "disclosed in part". Closed requests according to completion times are available under section 2.1 of Annex C.

The following charts provide an overview of the trends related to the volume of requests processed by AAFC over the past four years.





#### Exemptions invoked

 The appended statistical report provides details regarding the types of exemptions applied to information contained in records for completed requests. The most common exemption used by AAFC during the reporting period was section 26 (personal information about individuals other than the requester).

#### Extensions

- The Act allows extensions beyond the 30-day statutory time frame for specific reasons, such as the volume of relevant records associated with a request or required consultations with Other Government Departments (OGDs).
- During the reporting period, three requests required time extensions of up to 30 days owing to the volume of relevant records requiring review.

#### Consultations

- AAFC must also respond to consultations pursuant to the Act from other government institutions in order to provide those institutions with recommendations regarding the release of information of interest to AAFC.
- No request for consultation was received during the reporting period.

Requests for correction of personal information and notations

 No requests were received from individuals seeking a correction or notation to their personal information pursuant to subsection 12(2) of the Act.

#### 6. Impact of COVID-19-related measures on the administration of the *Privacy Act*

Compared to the last reporting period (April 1, 2019 to March 31, 2020), the effects of the pandemic on AAFC's ability to fulfill obligations with respect to the Act were sustained for the entirety of this 2020-2021 reporting period. Throughout this time there was limited ability to receive and process physical records given health and safety restrictions at AAFC worksites nationwide.

As a result, the AAFC ATIP Office pivoted to a digital-first, paperless approach and while this was a tremendous opportunity, it wasn't without its challenges and limitations. These included awareness and training during a time when employees were already adjusting to a major change in working remotely and challenges in terms of network capacity, and retrieving and processing sensitive records. Despite these hurdles, AAFC was able to fulfill all of its obligations under the Access to Information Act

#### 7. Privacy complaints, investigations and audits

No new complaints were received in this reporting period; however, three active complaints are carried over into 2021-2022. No investigations or audits were carried out.

#### 8. Material privacy breaches

In May 2014, TBS launched the updated *Guidelines for Privacy Breaches* based on changes made to the *Directive on Privacy Practices*. The updated guidelines and directive establish a mandatory requirement for departments to report all material privacy breaches to the Office of the Privacy Commissioner and TBS. In accordance with the Guidelines, a breach is defined as "material" if the breach "involves sensitive personal information that could reasonably be expected to cause serious injury or harm to the individual, and/or involves a large number of affected individuals."

No material privacy breaches occurred during the reporting period.

#### 9. Privacy policies, guidelines, procedures and engagement

The ATIP Office updates its policies, guidelines and procedures as necessary to maintain and fulfill compliance requirements and to assist employees in their management of personal information.

During the reporting period, the ATIP Office continued to play an active role in assisting AAFC employees with the effective management of personal information under the Department's control. Through defined processes, the ATIP Office was engaged, on an ongoing basis, by AAFC clients seeking advice on a variety of privacy related matters. The ATIP Office also participated in key working groups in order to proactively contribute to both departmental and community-wide initiatives. Highlights of work completed by the Office's Privacy Unit during the reporting period include the following:

- Reviewed 21 statements of sensitivity in order to make recommendations regarding the development of privacy impact assessments or privacy protocols for new or modified technology initiatives.
- In accordance with the Treasury Board Secretariat's Directive on Privacy Impact
   Assessment, reviewed Treasury Board submissions for new programs to determine if a
   privacy impact assessment would be required.
- Developed and/or reviewed privacy notices for the Department.
- Advised clients on privacy related matters concerning sections 4 to 8 of the *Privacy Act* on an "as needed" basis.
- Reviewed written questions to Parliament and other documents for *Privacy Act* considerations prior to publication or disclosure.
- Participated as a member of AAFC's Corporate Security Working Group, whose
  meetings continued to provide a valuable opportunity for the two sectors to collaborate
  on issues with overlapping privacy and security concerns.
- ATIP has reviewed a total of 15 Privacy inquiries and investigations.

#### 10. ATIP training and education

The ATIP Office continues to invest in its people and is focussed on enhancing departmental capacity by offering a wide range of ATIP-related training courses. These offerings ensure that staff and management understand their roles and responsibilities with respect to the Acts and related policies like information management, which facilitates AAFC's ability to comply and better serve Canadians.

Regular course offerings are available in our departmental training. They are also provided individually to new employees as well as to branch units when requested, these include:

<u>CSPS:</u> An online 'Access to Information and Privacy Fundamentals' course is available to all staff via the Canada School of Public Service and is recommended as a foundation for all departmental employees.

<u>AAFC's ATIP 101</u>: Provides a general overview of the legislation and policies (including Bill C-58 implications) governing the ATIP function. The course focusses on the roles and responsibilities of departmental stakeholders with respect of the handling of ATIP requests.

<u>AAFC's ATI Deep Dive/Exemptions</u>: A follow-up to ATIP 101, this interactive workshop details the most commonly used legislative provisions, providing tips and considerations for the handling of exemptions and the redaction of information. It is aimed at employees responding regularly to Access to Information requests.

<u>Digital ATIP Demo</u>: A practical guided tour of how the e-recovery process is intended to work and support OPI's and Subject Matter Experts (SME) along the access to information and privacy process.

AAFC's ATIP and Information Management Best Practices: The ATIP Office also collaborated with colleagues in the Information Systems Branch to develop a joint training product on ATIP-IM Best Practices. This training provides tips to manage information effectively and identifies the important crosswalks to obligations in the management of access to information and privacy files.

During the 2020-2021 reporting period, 30 formal awareness sessions were delivered, reaching a total of 964 employees.

#### 11. Monitoring Compliance

AAFC uses an automated system to monitor the timely processing of privacy requests. The workflow case management tool tracks all actions and due dates, stores relevant records requiring review, maintains audit logs, promotes the use of standard templates, allows extensive search capability to facilitate analysis, and generates progress and statistical reports.

The ATIP Office kept senior management apprised of the status of privacy request processing on a strict need-to-know basis only.

#### 12. Privacy impact assessments

AAFC uses PIAs and privacy protocols to determine whether privacy risks may be present in new or existing AAFC programs or initiatives that manage personal information for administrative purposes.

One PIA was undertaken for the Mandatory Isolation Support of Temporary Foreign Workers Program that was set to run from May 5<sup>th</sup>, 2020 to September 30<sup>th</sup>, 2020 and the following two initiatives were addressed via Protocol: Food Waste Reduction Challenge (beginning May 2021) and Emergency Processing Fund first announced by AAFC May 2020.

Summaries of AAFC's completed PIAs are published on the Department's <u>Access to Information and Privacy Services pages</u>.

#### 13. Disclosures pursuant to paragraph 8(2)(m)

Paragraph 8(2)(m) of the Act allows for the disclosure of personal information without the consent of the individual in specific circumstances. During the reporting period, no such disclosures were made under that paragraph.

#### 14. Conclusion

The department's move to paperless ATIP was thankfully underway when mandatory restrictions of COVID-19 meant employees had to work remotely. The ATIP Office quickly adapted to fully adopt the new procedures, along with the rest of the department, which resulted in more requests being processed than would have otherwise been possible under the circumstances. Despite the impacts of COVID-19 including the reduced operational capacity within the department, AAFC's privacy unit demonstrated the department's commitment to the requirements and the spirit of the Act with a year of robust programing and development.

During the reporting period, privacy requests were all closed within established timelines and the privacy unit also worked in partnership with senior officials and program officers to ensure compliance in all of its other business streams. The department demonstrated a consistent and determined "privacy by design" approach to protect the personal information of its employees and the Canadian public.

#### **Privacy Act Designation Order**

# **Agriculture and Agri-Food Canada**

The Minister of Agriculture and Agri-Food Canada, pursuant to section 73 of the *Privacy Act*, hereby designates the persons of the Department holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and perform the duties and functions of the Minister as the head of a government institution under the sections of the *Act* set out in the schedule opposite each position. This Designation Order supersedes all previous Designation Orders.

October 5, 2020

Date

Name

Minister of Agriculture and Agri-Food Canada

# Delegation of authority instrument for the administration of the ${\it Privacy Act}$

| Sections of the Privacy Act | Powers, Duties or Functions   | Assistant Deputy<br>Minister<br>Public Affairs Branch | Director General<br>Communications<br>Services | Director<br>ATIP and<br>Translation<br>Services | Privacy<br>Manager |
|-----------------------------|---|---|--|---|--------------------|
| 8(2)(j)                     | Disclosure of personal information for research of statistical purposes.                        | Х   | X  | X   | -                  |
| 8(2)(m)                     | Disclosure of personal information in the public interest or in the interest of the individual. | Х   | X  | Х   | -                  |
| 8(4)                        | Copies of requests under paragraph 8(2)(e).   | Х   | X  | Х   | -                  |
| 8(5)                        | Notice of disclosure under paragraph 8(2)(m).   | Х   | X  | Х   | -                  |
| 9(1)                        | Record for disclosure.  | X   | X  | X   | -                  |
| 9(4)                        | Consistent uses.  | X   | X  | X   | -                  |
| 10                          | Personal information banks.   | X   | X  | X   | -                  |
| 14                          | To notify applicant and to give access to the record.   | Х   | X  | X   | X                  |
| 15                          | To extend time limit and notify applicant.  | X   | X  | Х   | Х                  |
| 16                          | Where access is refused   | X   | X  | X   | X                  |
| 17(2)(b)                    | To determine the necessity for translation or interpretation of record.                         | Х   | X  | Х   | Х                  |
| 17(3)(b)                    | Access to personal information in alternative format  | Х   | X  | Х   | X                  |
| 18(2)                       | To refuse to disclose information contained in an exempt bank.                                  | Х   | X  | Х   | -                  |

| Sections<br>of the<br>Privacy Act | Powers, Duties or Functions   | Assistant Deputy<br>Minister<br>Public Affairs Branch | Director General<br>Communications<br>Services | Director<br>ATIP and<br>Translation<br>Services | Manager<br>Privacy |
|-----------------------------------|---|---|--|---|--------------------|
| 19(1)                             | To exempt personal information obtained in confidence from another government.    | X   | X  | X   | х                  |
| 19(2)                             | To disclose with consent of the other government.                                 | Х   | X  | X   | X                  |
| 20                                | To exempt personal information re: federal-provincial affairs.                    | Х   | Х  | X   | X                  |
| 21                                | To exempt information re: international affairs and defense.                      | Х   | Х  | X   | X                  |
| 22                                | To exempt information re: law enforcement and investigation.                      | Х   | Х  | X   | X                  |
| 22.3                              | To exempt information re: Public Servants Disclosure Protection Act               | Х   | X  | X   | Х                  |
| 23                                | To exempt information re: security clearances.                                    | Х   | Х  | X   | X                  |
| 24                                | To exempt personal information re: individuals sentenced for an offense.          | Х   | X  | X   | Х                  |
| 25                                | To exempt personal information re: safety of individuals.                         | Х   | Х  | X   | X                  |
| 26                                | To exempt personal information about another individual.                          | Х   | X  | X   | X                  |
| 27                                | Protected information — solicitors and notaries.                                  | X   | Х  | X   | Х                  |
| 28                                | To exempt personal information re: medical records.                               | Х   | Х  | X   | Х                  |
| 33(2)                             | To make representations to the Privacy Commissioner during an investigation.      | Х   | X  | X   | -                  |
| 35(1)(b)                          | Notice of actions to implement recommendations of Commissioner.                   | Х   | X  | X   | -                  |
| 35(4)                             | To provide access to applicant pursuant to Privacy Commissioner's recommendation. | X   | X  | X   | -                  |

| Sections<br>of the<br>Privacy Act | Powers, Duties or Functions  | Assistant Deputy<br>Minister<br>Public Affairs Branch | Director General<br>Communications<br>Services | Director<br>ATIP and<br>Translation<br>Services | Manager<br>Privacy |
|-----------------------------------|--|---|--|---|--------------------|
| 36(3)(b)                          | Notice of actions to implement recommendations of Commissioner concerning exempt banks.    | Х   | X  | X   | -                  |
| 37(3)                             | To receive report of Privacy<br>Commissioner's findings after<br>compliance investigation. | Х   | Х  | X   | -                  |
| 51(2)(b), 51(3)                   | Special rules for hearings. Special rules for hearings                                     | Х   | Х  | X   | -                  |
| 72                                | Annual Report to Parliament  | Х   | Х  | X   | -                  |
| 73.1(4)                           | To charge fees for services.   | Х   | Х  | X   |                    |
| 73.1(3)                           | Notice of provision of services related to privacy.  | Х   | Х  | X   | -                  |
| 73.1(5)                           | Spending authority.  | Х   | Х  | X   | -                  |

| Section of the<br>Privacy<br>Regulations | Powers, Duties or<br>Functions  | Assistant Deputy<br>Minister<br>Public Affairs Branch | Director General<br>Communications<br>Services | Director<br>ATIP and<br>Translation Services | Manager<br>Privacy |
|--|---|---|--|--|--------------------|
| 9  | Examination of information.   | X   | X  | X  | X                  |
| 11(2)                                    | Notification that correction<br>to personal information has<br>been made  | X   | X  | X  | Х                  |
| 11(4)                                    | Notification that correction<br>to personal information has<br>been refused   | X   | X  | X  | -                  |
| 13(1)                                    | Disclosure of personal information relating to physical or mental health may be disclosed to a duly qualified medical practitioner or psychologist in order to provide an opinion as to whether disclosure of the information | X   | X  | X  | -                  |

|    | would be contrary to the best<br>interests of the individual   |   |   |   |   |
|----|--|---|---|---|---|
| 14 | Disclosure of personal information relating to physical or mental health may be made to a requestor in the presence of a qualified medical practitioner or psychologist. | X | X | X | - |



# Statistical Report on the *Privacy Act*

Name of institution: Agriculture and Agri-Food Canada

**Reporting period:** 4/1/2020 to 3/31/2021

#### Section 1: Requests Under the Privacy Act

#### 1.1 Number of requests

|  | Number of Requests |
|--|--------------------|
| Received during reporting period           | 18                 |
| Outstanding from previous reporting period | 0                  |
| Total                                      | 18                 |
| Closed during reporting period             | 18                 |
| Carried over to next reporting period      | 0                  |

#### Section 2: Requests Closed During the Reporting Period

#### 2.1 Disposition and completion time

| Disposition of               | Completion Time |                  |                  |                   |                    |                    |                       |       |
|------------------------------|-----------------|------------------|------------------|-------------------|--------------------|--------------------|-----------------------|-------|
| Disposition of Requests      | 1 to 15<br>Days | 16 to 30<br>Days | 31 to 60<br>Days | 61 to 120<br>Days | 121 to 180<br>Days | 181 to 365<br>Days | More Than<br>365 Days | Total |
| All disclosed                | 2               | 0                | 0                | 0                 | 0                  | 0                  | 0                     | 2     |
| Disclosed in part            | 1               | 4                | 4                | 1                 | 0                  | 0                  | 0                     | 10    |
| All exempted                 | 0               | 0                | 0                | 0                 | 0                  | 0                  | 0                     | 0     |
| All excluded                 | 0               | 0                | 0                | 0                 | 0                  | 0                  | 0                     | 0     |
| No records exist             | 1               | 1                | 1                | 0                 | 0                  | 0                  | 0                     | 3     |
| Request abandoned            | 2               | 1                | 0                | 0                 | 0                  | 0                  | 0                     | 3     |
| Neither confirmed nor denied | 0               | 0                | 0                | 0                 | 0                  | 0                  | 0                     | 0     |
| Total                        | 6               | 6                | 5                | 1                 | 0                  | 0                  | 0                     | 18    |



# 2.2 Exemptions

| Section  | Number of Requests | Section       | Number of<br>Requests | Section | Number of<br>Requests |
|----------|--------------------|---------------|-----------------------|---------|-----------------------|
| 18(2)    | 0                  | 22(1)(a)(i)   | 0                     | 23(a)   | 0                     |
| 19(1)(a) | 0                  | 22(1)(a)(ii)  | 0                     | 23(b)   | 0                     |
| 19(1)(b) | 0                  | 22(1)(a)(iii) | 0                     | 24(a)   | 0                     |
| 19(1)(c) | 0                  | 22(1)(b)      | 1                     | 24(b)   | 0                     |
| 19(1)(d) | 0                  | 22(1)(c)      | 0                     | 25      | 0                     |
| 19(1)(e) | 0                  | 22(2)         | 0                     | 26      | 10                    |
| 19(1)(f) | 0                  | 22.1          | 0                     | 27      | 0                     |
| 20       | 0                  | 22.2          | 0                     | 27.1    | 0                     |
| 21       | 0                  | 22.3          | 0                     | 28      | 0                     |
|          | -                  | 22.4          | 0                     |         | •                     |

#### 2.3 Exclusions

| Section  | Number of Requests | Section  | Number of<br>Requests | Section  | Number of<br>Requests |
|----------|--------------------|----------|-----------------------|----------|-----------------------|
| 69(1)(a) | 0                  | 70(1)    | 0                     | 70(1)(d) | 0                     |
| 69(1)(b) | 0                  | 70(1)(a) | 0                     | 70(1)(e) | 0                     |
| 69.1     | 0                  | 70(1)(b) | 0                     | 70(1)(f) | 0                     |
|          |                    | 70(1)(c) | 0                     | 70.1     | 0                     |

#### 2.4 Format of information released

| Paper | Electronic | Other |
|-------|------------|-------|
| 1     | 11         | 0     |

# 2.5 Complexity

# 2.5.1 Relevant pages processed and disclosed

| Number of Pages<br>Processed | Number of Pages<br>Disclosed | Number of Requests |
|------------------------------|------------------------------|--------------------|
| 9641                         | 1894                         | 15                 |

# 2.5.2 Relevant pages processed and disclosed by size of requests

|                                    | Less Than 100<br>Pages Processed |                    | 101-500<br>Pages Processed |     | 501-1000<br>Pages Processed |                    | 1001-5000<br>Pages Processed |                    | More Than 5000<br>Pages Processed |                    |
|------------------------------------|----------------------------------|--------------------|----------------------------|-----|-----------------------------|--------------------|------------------------------|--------------------|-----------------------------------|--------------------|
| Disposition                        | Number of Requests               | Pages<br>Disclosed | Number of<br>Requests      |     | Number of<br>Requests       | Pages<br>Disclosed | Number of<br>Requests        | Pages<br>Disclosed | Number<br>of<br>Requests          | Pages<br>Disclosed |
| All disclosed                      | 2                                | 0                  | 0                          | 0   | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| Disclosed in part                  | 4                                | 57                 | 3                          | 357 | 1                           | 302                | 1                            | 261                | 1                                 | 917                |
| All exempted                       | 0                                | 0                  | 0                          | 0   | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| All excluded                       | 0                                | 0                  | 0                          | 0   | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| Request abandoned                  | 3                                | 0                  | 0                          | 0   | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| Neither<br>confirmed<br>nor denied | 0                                | 0                  | 0                          | 0   | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| Total                              | 9                                | 57                 | 3                          | 357 | 1                           | 302                | 1                            | 261                | 1                                 | 917                |

# 2.5.3 Other complexities

| Disposition                        | Consultation<br>Required | Legal Advice<br>Sought | Interwoven<br>Information | Other | Total |
|------------------------------------|--------------------------|------------------------|---------------------------|-------|-------|
| All disclosed                      | 0                        | 0                      | 0                         | 0     | 0     |
| Disclosed in part                  | 0                        | 0                      | 0 0                       |       | 1     |
| All exempted                       | 0                        | 0                      | 0                         | 0     | 0     |
| All excluded                       | 0                        | 0                      | 0                         | 0     | 0     |
| Request abandoned                  | 0                        | 0                      | 0                         | 0     | 0     |
| Neither<br>confirmed<br>nor denied | 0                        | 0                      | 0                         | 0     | 0     |
| Total                              | 0                        | 0                      | 0                         | 1     | 1     |

#### 2.6 Closed requests

# 2.6.1 Number of requests closed within legislated timelines

|   | Requests closed within<br>legislated timelines |
|---|--|
| Number of requests closed within legislated timelines         | 18   |
| Percentage of requests closed within legislated timelines (%) | 100  |

#### 2.7 Deemed refusals

# 2.7.1 Reasons for not meeting legislated timelines

|  |   | Principa                 | al Reason                |       |
|--|---|--------------------------|--------------------------|-------|
| Number of Requests Closed Past<br>the Legislated Timelines | Interference with<br>Operations /<br>Workload | External<br>Consultation | Internal<br>Consultation | Other |
| 0  | 0   | 0                        | 0                        | 0     |

# 2.7.2 Requests closed beyond legislated timelines (including any extension taken)

| Number of Days Past<br>Legislated Timelines | Number of Requests Past<br>Legislated Timeline<br>Where No Extension Was<br>Taken | Number of Requests Past<br>Legislated Timelines Where<br>an Extension Was Taken | Total |
|---|---|---|-------|
| 1 to 15 days                                | 0   | 0   | 0     |
| 16 to 30 days                               | 0   | 0   | 0     |
| 31 to 60 days                               | 0   | 0   | 0     |
| 61 to 120 days                              | 0   | 0   | 0     |
| 121 to 180 days                             | 0   | 0   | 0     |
| 181 to 365 days                             | 0   | 0   | 0     |
| More than 365 days                          | 0   | 0   | 0     |
| Total                                       | 0   | 0   | 0     |

#### 2.8 Requests for translation

| Translation Requests | Accepted | Refused | Total |
|----------------------|----------|---------|-------|
| English to French    | 0        | 0       | 0     |
| French to English    | 0        | 0       | 0     |
| Total                | 0        | 0       | 0     |

# Section 3: Disclosures Under Subsections 8(2) and 8(5)

| Paragraph 8(2)(e) | Paragraph 8(2)(m) | Subsection 8(5) | Total |  |
|-------------------|-------------------|-----------------|-------|--|
| 0                 | 0                 | 0               | 0     |  |

# **Section 4: Requests for Correction of Personal Information and Notations**

| Disposition for Correction Requests Received | Number |
|--|--------|
| Notations attached                           | 0      |
| Requests for correction accepted             | 0      |
| Total  | 0      |

# **Section 5: Extensions**

#### 5.1 Reasons for extensions and disposition of requests

|           |                | 15(a)(i) Interferen | ce with operations | 15 (a)(ii) (        |                  |          |          |             |
|-----------|----------------|---------------------|--------------------|---------------------|------------------|----------|----------|-------------|
|           |                |                     |                    |                     |                  |          |          |             |
| Number of |                |                     |                    |                     |                  |          |          |             |
| requests  | Further review |                     |                    |                     | Cabinet          |          |          | 15(b)       |
| where an  | required to    |                     |                    |                     | Confidence       |          |          | Translation |
| extension | determine      | Large volume of     | Large volume of    | Documents are       | Section (Section |          |          | purposes or |
| was taken | exemptions     | pages               | requests           | difficult to obtain | 70)              | External | Internal | conversion  |
| 3         | 0              | 3                   | 0                  | 0                   | 0                | 0        | 0        | 0           |

#### 5.2 Length of extensions

| -                       |   | 15(a)(i) Interference with operations |                          |                                      |   |          | 15 (a)(ii) Consultation |   |  |  |
|-------------------------|---|---------------------------------------|--------------------------|--------------------------------------|---|----------|-------------------------|---|--|--|
| Length of<br>Extensions | Further review required to determine exemptions | Large volume of pages                 | Large volume of requests | Documents are<br>difficult to obtain | Cabinet Confidence Section (Section 70) | External | Internal                | 15(b)<br>Translation<br>purposes or<br>conversion |  |  |
| 1 to 15 days            | 0   | 0                                     | 0                        | 0                                    | 0                                       | 0        | 0                       | 0   |  |  |
| 16 to 30<br>days        | 0   | 3                                     | 0                        | 0                                    | 0                                       | 0        | 0                       | 0   |  |  |
| 31 days or greater      |   |                                       |                          |                                      |   |          |                         | 0   |  |  |
| Total                   | 0   | 3                                     | 0                        | 0                                    | 0                                       | 0        | 0                       | 0   |  |  |

# Section 6: Consultations Received From Other Institutions and Organizations

# 6.1 Consultations received from other Government of Canada institutions and other organizations

| Consultations                                  | Other<br>Government of<br>Canada<br>Institutions | Number of Pages<br>to Review | Other Organizations | Number of Pages<br>to Review |
|--|--|------------------------------|---------------------|------------------------------|
| Received during the reporting period           | 0  | 0                            | 0                   | 0                            |
| Outstanding from the previous reporting period | 0  | 0                            | 0                   | 0                            |
| Total  | 0  | 0                            | 0                   | 0                            |
| Closed during the reporting period             | 0  | 0                            | 0                   | 0                            |
| Carried over to the next reporting period      | 0  | 0                            | 0                   | 0                            |

# 6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

|                           | N               | Number of Days Required to Complete Consultation Requests |                  |                   |                    |                    |                     |       |  |  |
|---------------------------|-----------------|---|------------------|-------------------|--------------------|--------------------|---------------------|-------|--|--|
| Recommendation            | 1 to 15<br>Days | 16 to 30<br>Days  | 31 to 60<br>Days | 61 to 120<br>Days | 121 to<br>180 Days | 181 to 365<br>Days | Than<br>365<br>Days | Total |  |  |
| All disclosed             | 0               | 0   | 0                | 0                 | 0                  | 0                  | 0                   | 0     |  |  |
| Disclosed in part         | 0               | 0   | 0                | 0                 | 0                  | 0                  | 0                   | 0     |  |  |
| All exempted              | 0               | 0   | 0                | 0                 | 0                  | 0                  | 0                   | 0     |  |  |
| All excluded              | 0               | 0   | 0                | 0                 | 0                  | 0                  | 0                   | 0     |  |  |
| Consult other institution | 0               | 0   | 0                | 0                 | 0                  | 0                  | 0                   | 0     |  |  |
| Other                     | 0               | 0   | 0                | 0                 | 0                  | 0                  | 0                   | 0     |  |  |
| Total                     | 0               | 0   | 0                | 0                 | 0                  | 0                  | 0                   | 0     |  |  |

# 6.3 Recommendations and completion time for consultations received from other organizations

|                           | Number of days required to complete consultation requests |                  |                  |                   |                    |                    |                             |       |
|---------------------------|---|------------------|------------------|-------------------|--------------------|--------------------|-----------------------------|-------|
| Recommendation            | 1 to 15<br>Days   | 16 to 30<br>Days | 31 to 60<br>Days | 61 to 120<br>Days | 121 to<br>180 Days | 181 to 365<br>Days | More<br>Than<br>365<br>Days | Total |
| All disclosed             | 0   | 0                | 0                | 0                 | 0                  | 0                  | 0                           | 0     |
| Disclosed in part         | 0   | 0                | 0                | 0                 | 0                  | 0                  | 0                           | 0     |
| All exempted              | 0   | 0                | 0                | 0                 | 0                  | 0                  | 0                           | 0     |
| All excluded              | 0   | 0                | 0                | 0                 | 0                  | 0                  | 0                           | 0     |
| Consult other institution | 0   | 0                | 0                | 0                 | 0                  | 0                  | 0                           | 0     |
| Other                     | 0   | 0                | 0                | 0                 | 0                  | 0                  | 0                           | 0     |
| Total                     | 0   | 0                | 0                | 0                 | 0                  | 0                  | 0                           | 0     |

# **Section 7: Completion Time of Consultations on Cabinet Confidences**

#### 7.1 Requests with Legal Services

|                  |                    | Than 100 Pages 101-500 Pages Processed Processed |                       | 501-1000<br>Pages Processed |                       | 1001-5000<br>Pages Processed |                       | More than 5000<br>Pages Processed |                          |                    |
|------------------|--------------------|--|-----------------------|-----------------------------|-----------------------|------------------------------|-----------------------|-----------------------------------|--------------------------|--------------------|
| Number of Days   | Number of Requests | Pages<br>Disclosed                               | Number of<br>Requests | Pages<br>Disclosed          | Number of<br>Requests | Pages<br>Disclosed           | Number of<br>Requests | Pages<br>Disclosed                | Number<br>of<br>Requests | Pages<br>Disclosed |
| 1 to 15          | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |
| 16 to 30         | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |
| 31 to 60         | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |
| 61 to 120        | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |
| 121 to 180       | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |
| 181 to 365       | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |
| More than<br>365 | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |
| Total            | 0                  | 0  | 0                     | 0                           | 0                     | 0                            | 0                     | 0                                 | 0                        | 0                  |

#### 7.2 Requests with Privy Council Office

|                  | Fewer Than 1<br>Proces | -                  | 101–500<br>Proce      | •                  | 501-1000<br>Pages Processed |                    | 1001-5000<br>Pages Processed |                    | More than 5000<br>Pages Processed |                    |
|------------------|------------------------|--------------------|-----------------------|--------------------|-----------------------------|--------------------|------------------------------|--------------------|-----------------------------------|--------------------|
| Number of Days   | Number of<br>Requests  | Pages<br>Disclosed | Number of<br>Requests | Pages<br>Disclosed | Number of<br>Requests       | Pages<br>Disclosed | Number of<br>Requests        | Pages<br>Disclosed | Number<br>of<br>Requests          | Pages<br>Disclosed |
| 1 to 15          | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| 16 to 30         | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| 31 to 60         | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| 61 to 120        | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| 121 to 180       | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| 181 to 365       | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| More than<br>365 | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |
| Total            | 0                      | 0                  | 0                     | 0                  | 0                           | 0                  | 0                            | 0                  | 0                                 | 0                  |

# Section 8: Complaints and Investigations Notices Received

| Section 31 | Section 33 | Section 35 | Court action | Total |
|------------|------------|------------|--------------|-------|
| 0          | 1          | 0          | 0            | 1     |

# Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

#### 9.1 Privacy Impact Assessments

| Number of PIA(s) completed | 3 |
|----------------------------|---|

#### 9.2 Personal Information Banks

| Personal Information Banks | Active | Created | Terminated | Modified |
|----------------------------|--------|---------|------------|----------|
|                            | 17     | 0       | 0          | 0        |

# Section 10: Material Privacy Breaches

| Number of material privacy breaches reported to TBS | 0 |
|---|---|
| Number of material privacy breaches reported to OPC | 0 |

# Section 11: Resources Related to the Privacy Act

#### 11.1 Costs

| Expenditures                    |          | Amount    |  |  |
|---------------------------------|----------|-----------|--|--|
| Salaries                        |          | \$337,366 |  |  |
| Overtime                        |          | \$0       |  |  |
| Goods and Services              |          | \$25,849  |  |  |
| Professional services contracts | \$13,316 |           |  |  |
| Other                           | \$12,533 |           |  |  |
| Total                           |          | \$363,215 |  |  |

#### 11.2 Human Resources

| Resources                        | Person Years Dedicated to<br>Privacy Activities |
|----------------------------------|---|
| Full-time employees              | 3.530   |
| Part-time and casual employees   | 0.000   |
| Regional staff                   | 0.000   |
| Consultants and agency personnel | 0.005   |
| Students                         | 0.000   |
| Total                            | 3.535   |

Note: Enter values to three decimal places.