



Office of the Commissioner
of Lobbying of Canada

Commissariat au lobbying
du Canada

Privacy Act

ANNUAL REPORT 2019-20

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For a print copy of this publication, please contact:

Office of the Commissioner of Lobbying
410 Laurier Avenue, 8th Floor
Ottawa ON • K1R 1B7

Tel.: (613) 957-2760
Fax: (613) 957-3078
Email: Info@lobbycanada.gc.ca

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Introduction

The *Privacy Act* (Revised Statute of Canada 1985, Chapter P-21) was proclaimed on July 1, 1983. The *Privacy Act* extends to individual Canadian citizens and permanent residents, the right of access to information about themselves held by the government, subject to specific and limited exceptions. The *Privacy Act* also protects the individual's right to privacy by preventing others from having access to personal information and gives individuals substantial control over its collection and use.

Section 72 of the *Privacy Act* requires that the head of every government institution prepare an annual report on the administration of the Act within the institution during each financial year for submission to Parliament.

This annual report is submitted by the Office of the Commissioner of Lobbying (OCL) in accordance with the *Privacy Act*. It describes how the OCL fulfilled its responsibilities under this Act in fiscal year 2019-20.

The Office of the Commissioner of Lobbying

The Commissioner of Lobbying's mandate, derived from the *Lobbying Act* (the Act), is to ensure transparency of the lobbying of federal public office holders. This contributes to increasing the confidence Canadians have in the integrity of government decision making.

The Commissioner's mandate is threefold:

- maintaining the Registry of Lobbyists, which contains and makes public the registration information disclosed by lobbyists;
- developing and implementing educational programs to foster public awareness of the requirements of the Act; and
- conducting reviews and investigations to ensure compliance with the Act and the *Lobbyists' Code of Conduct* (the Code).

Under the Act, the Commissioner of Lobbying also has the authority to grant exemptions to former designated public office holders who are subject to a five-year prohibition on lobbying activities.

The Commissioner reports annually to Parliament on the administration of the Act and the Code. The Commissioner is also required to table to Parliament reports on investigations, which include her findings, conclusions and the reasons for her conclusions.

Responsibility for Information Rights and Delegation of Authority

The *Privacy Act* provides the authority to the Commissioner of Lobbying to exercise full powers granted under the Act. The OCL's Access to Information and Privacy (ATIP) Coordinator is delegated the authority via a Delegation Order, of which copies are attached in Annex A. The OCL has two positions responsible for the administration of the *Privacy Act*, an ATIP Coordinator and an Executive Assistant.

The Director of Investigations and Corporate services was the ATIP Coordinator from April 1st, 2019 to March 31, 2020. The ATIP Coordinator is responsible for the development, coordination and implementation of effective policies, guidelines and procedures to manage the OCL's compliance with the *Privacy Act*. The Coordinator makes decisions on the disposition of requests under the *Privacy Act*, promotes awareness of the legislation to ensure organizational responsiveness to its obligations, as well as monitors and advises on compliance with the *Privacy Act*, regulations, procedures and policies. Further, the Coordinator acts as spokesperson for the OCL in dealings with the Treasury Board Secretariat, the Privacy Commissioner, and other government departments and agencies. The Coordinator is also responsible for conducting consultations with other governments within Canada and other federal organizations, as required. Finally, the Coordinator is the point of contact on issues involving the collection of personal information and privacy.

The Executive Assistant provide support to the ATIP Coordinator on the process of any requests received under the *Privacy Act*.

Due to the limited number of requests received, the OCL did not dispose of any service agreements under section 73.1 of the *Privacy Act* during the reporting period from April 1st, 2019 to March 31, 2020.

Under the Act, the OCL collects information from registrants and lobbyists and the disclosures filed by registrants are accessible on the Registry of Lobbyists at the following address: lobbycanada.gc.ca.

The OCL's Annual Report and Reports on Investigations must be tabled in both Houses of Parliament. They are also posted on the OCL's website and on the Open Government Portal under the AIA requesting that all reports tabled in Parliament be proactively disclosed.

Administration of the Privacy Act

Statistical Report

Annex B provides a statistical summary of requests under the *Privacy Act*. In 2019-20, the OCL did not receive any request under the Act.

Over the past five years, the OCL has received only two requests under the *Privacy Act* and no consultation from other institutions.

Fiscal year	Requests received	Consultation completed from other institutions
2019-20	0	0
2018-19	0	0
2017-18	0	0
2016-17	1	0
2015-16	1	0

Since the OCL did not receive any request under the *Privacy Act*, the COVID-19 pandemic did not impact the OCL ability to fulfill its *Privacy Act* responsibilities. Therefore, the OCL did not have to put some mitigation measures in place.

Fees

No fees are applicable under the *Privacy Act*.

Information Holdings

The OCL is responsible for providing a full accounting of information holdings to the Treasury Board Secretariat and ensuring that updates are provided for inclusion in the Canada.ca publication. This publication contains a description of the classes of institutional records held by the OCL, and can be obtained through public or academic libraries or it may be viewed online on the Treasury Board Secretariat's website at Canada.ca. The OCL does not have any exempt banks.

OCL Website

The OCL's website at lobbycanada.gc.ca, allows the user to access and search the Registry of Lobbyists, as well as to obtain copies of reports, including the OCL's annual reports on Access to Information and Privacy. Summaries of completed requests are available on the OCL website.

Reading Room

A reading room is available at the OCL's office, situated on the 8th Floor at 410 Laurier Avenue West, Ottawa, Ontario, Canada K1R 1B7.

Education and Training Activities

In 2019-20, the OCL did not provide any education and training activity regarding the *Privacy Act* to its staff.

Privacy Impact Assessments

No Privacy Impact Assessment (PIA) was completed for the period of 2019-20.

Disclosure of Personal Information

There were no disclosures of personal information by the OCL during the reporting period pursuant to each of the following provisions of the *Privacy Act*: paragraphs 8(2)(m), 19(1)(e) or (f), or sections 22.2, 22.3, 69.1 or 70.1.

New/Revised Policies, Guidelines and Procedures Implemented

During the reporting period, the OCL did not implement new policies, guidelines, procedures or initiatives related to the *Privacy Act*.

Complaints

No complaints concerning the *Privacy Act* were received from the Office of the Privacy Commissioner in 2019-20.

Application to the Federal Court

There were no applications filed in 2019-20 related to the *Privacy Act*.

Data Matching and Sharing Activities

No data matching or sharing activities were undertaken during 2019-20.

Time to Process Access to Information Request Monitoring

Given the small number of requests received and processed by the OCL, no formal monitoring system was required during the reporting period.

Material Privacy Breaches

No Material Privacy Breaches occurred in 2019-20.

Annex A – Delegation Orders

Access to Information Act and Privacy Act

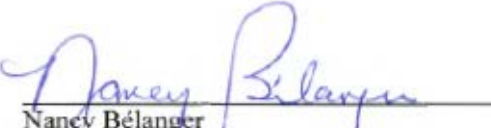
Delegation Order

The Commissioner of Lobbying, pursuant to section 73 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby designates the person holding the position set out in the schedule hereto, or the person occupying on an acting basis that position, to exercise the powers, duties and functions of the Commissioner of Lobbying as the head of the Office of the Commissioner of Lobbying, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Director of Registration and Client Services	Full authority	Full authority

Dated, at the City of Ottawa, this Tuesday, May 1, 2018,


Nancy Bélanger

Access to Information Act and Privacy Act

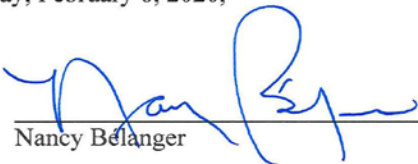
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Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Director of Registration and Client Services / Currently Director, Investigations and Corporate Services (as of September 30, 2019)	Full authority	Full authority

Dated, at the City of Ottawa, this Thursday, February 6, 2020,



Nancy Belanger

Annex B – 2019-20 Statistical Report



Statistical Report on the *Privacy Act*

Name of institution: _____

Reporting period: 2019-04-01 to 2020-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

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

Section 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
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
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of 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)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
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 Requests	Section	Number of 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
0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
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	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

2.5.3 Other complexities

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

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

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

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where 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

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

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	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 Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages 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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
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

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
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

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages 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 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

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages 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 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	0	0	0	0

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

9.1 Privacy Impact Assessments

Number of PIA(s) completed	0
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	0	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	\$0
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
Total	\$0

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.00
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.00

Note: Enter values to two decimal places.