



RCMP External  
Review Committee

Comité externe  
d'examen de la GRC

# ***Privacy Act***

RCMP External Review Committee

Annual Report  
2023-2024

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# Report on *Privacy Act* 2023-2024

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## 1. Introduction

The *Privacy Act* protects the privacy of all Canadian citizens and permanent residents regarding personal information held by a government institution. It also gives individuals, including those in Canada who are not permanent residents or citizens, the right to access their own personal information.

This report was prepared and tabled in Parliament in accordance with [section 72 of the \*Privacy Act\*](#) which requires that the head of every government institution to prepare an annual report regarding the administration of the [Privacy Act](#) during the financial year. This report describes how the RCMP External Review Committee (ERC) administered the *Privacy Act* throughout financial year 2023-2024.

The ERC did not have any non-operational (“paper”) subsidiaries during this reporting period.

### Mandate of the RCMP External Review Committee

Established in 1986 under Part II of the [Royal Canadian Mounted Police Act](#), the RCMP External Review Committee contributes to fair and equitable labour relations and accountability within the RCMP through its independent and impartial review of appeal case files. The ERC issues findings and recommendations to the Commissioner of the RCMP for final decisions to be made in appeals regarding critically important matters (e.g. appeals of decisions in harassment complaints and of decisions to dismiss or demote an RCMP member for misconduct, to stop a member’s pay and allowances when a member is suspended from duty or to discharge a member for medical or performance reasons). The RCMP is required to refer appeal case files to the ERC for its review, findings and recommendations pursuant to the *Royal Canadian Mounted Police Act* and the *Royal Canadian Mounted Police Regulations*. The ERC reports directly to Parliament through the Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs.

## 2. ERC’s Organizational Structure to Fulfill its *Privacy Act* Responsibilities

Given the small size of the ERC (less than 30 FTEs) and the small number of requests it receives, all privacy-related functions are performed by the Director General of Corporate Services, and the Senior Officer, Planning and Reporting. The ERC has no regional offices. The ERC processes requests as follows:

- the requested information is identified;
- the requests are examined to see if they should be transferred to another government institution with a “greater interest”;
- possible exemptions are considered;
- a copy of the non-exempt information is prepared and forwarded to the requester with a transmittal letter; and,
- the requests and all related documentation are filed in the ERC's Access to Information and Privacy (ATIP) registry.

All personal information is compartmentalized, and access is controlled, to ensure it will only be used for the purposes for which it was collected.

The ERC relies on existing Treasury Board guidelines regarding privacy and protection of personal information.

The ERC has not entered into any service agreements under [section 73.1 of the Privacy Act](#) during this reporting period.

### 3. Delegation Order

The Minister of Public Safety and Emergency Preparedness Canada, pursuant to [section 73 of the Privacy Act](#), designated the Chairperson, the Director General of Corporate Services and the ATIP coordinator of the ERC to exercise the powers and perform the duties of the Minister as the head of a government institution (the RCMP External Review Committee) under certain sections of the *Act*. The responsibilities associated with the administration of the *Privacy Act* include notifying applicants of extensions and releasing records to applicants (see Annex A, Delegation Order).

### 4. Performance 2023-2024

Throughout fiscal year 2023-2024, the ERC received twenty-two (22) requests under the *Privacy Act*. The disposition of these requests is as follows:

All disclosed	0
Disclosed in part	1
All exempted	0
All excluded	0
No records exist	21
Request abandoned	0
Neither confirmed nor denied	0
<b>Total</b>	<b>22</b>

#### Disposition of Requests

Twenty-one (21) requests sent to the ERC yielded no existing records and one (1) request was disclosed in part. Twenty-one (21) were completed within 1 to 15 days, while one (1) request took between 16 to 30 days to complete. The ERC responded to 100% of requests within legislated timelines.

#### Number of Active Requests

As of the last day of the 2023-2024 reporting period, there were no active requests.

#### Number of Active Complaints

As of the end of the 2023-2024 fiscal year, there were no active complaints.

## Percentage of completed request for which records were “all disclosed”, and percentage for which records were “disclosed in part”

As of the end of the 2023-2024 fiscal year, 100% of completed requests that were released were disclosed in part.

### Other Consultations

There were no consultations on Cabinet Confidences under the *Privacy Act*.

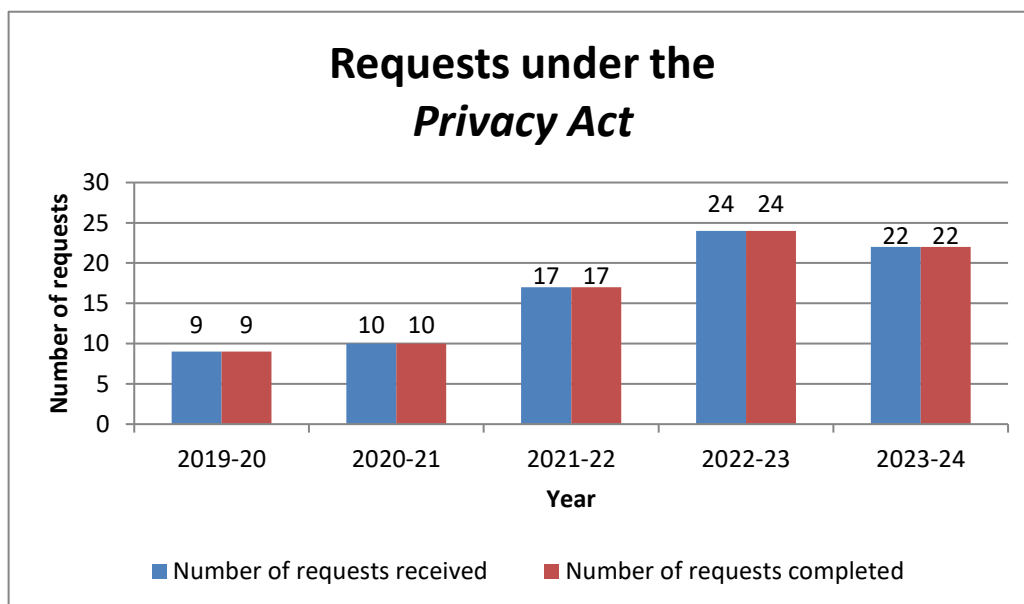
### Consultations from Other Institutions

During the reporting period, the ERC has not received any consultations regarding a formal privacy request obtained by another federal institution.

For additional information, please refer to Annex B and Annex C for statistical report on *Privacy Act* requests processed by the ERC between April 1, 2023, and March 31, 2024.

### Multi-Year Trends

Evaluation of multi-year trends is difficult given the small number of requests received each year by the ERC. Over the past five (5) years, the ERC received and completed an average of 16.4 requests per year (see Figure below). During the fiscal year 2023-2024, the ERC received twenty-two (22) requests which were all completed.



## **5. Training and Awareness**

Although no formal privacy training was provided to ERC staff, during 2023-2024, 100% of new employees completed the ERC's mandatory training course, Access to Information and Privacy Fundamentals (COR502) offered online by the Canada School of Public Service. To date 96% of all ERC employees have completed the mandatory training. Additionally, some ERC legal counsel have legal training in ATIP matters as the assessment of some requests may require legal analysis or advice.

Information about the *Privacy Act* is routinely circulated to ERC staff in the course of normal operations.

## **6. Policies, Guidelines and Procedures**

The ERC did not implement any new or revised privacy-related policies, guidelines, procedures or initiatives during the reporting period.

## **7. Initiatives and Projects to Improve Privacy**

The ERC did not implement any new or revised privacy-related initiatives and projects during the reporting period.

## **8. Summary of Key Issues and Actions taken on Complaints or Audits**

No audits were initiated or concluded during the reporting period.

The ERC received no complaints from the Office of the Privacy Commissioner during the reporting period.

## **9. Material Privacy Breaches**

No privacy breaches occurred during the fiscal year 2023-2024.

## **10. Privacy Impact Assessments**

There were no Privacy Impact Assessments (PIAs) undertaken by the ERC during the fiscal year 2023-2024.

## **11. Public Interest Disclosures**

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent. During the reporting period, the ERC did not disclose personal information pursuant to [paragraph 8\(2\)\(m\) of the \*Privacy Act\*](#).

## **12. Monitoring Compliance**

Monitoring of the time to process privacy information requests during the reporting period is carried out when the ERC receives requests. Time to process requests is also discussed in the responsible management committee when required.

## ***Privacy Act Delegation Order***

The Minister of Public Safety and Emergency Preparedness, pursuant to section 73(1) of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Public Safety and Emergency Preparedness, under the provisions of the *Privacy Act* and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

<b>Position</b>	<b>Authorities Under the <i>Privacy Act</i> and <i>Privacy Act Regulations</i></b>
Chairperson Senior Director, Corporate Services and CFO General Counsel and Director of Operations ATIP/Privacy Coordinator	Full authority
Senior Officer, Planning and Reporting	Section 15 of the <i>Privacy Act</i>
Chairperson Senior Director, Corporate Services and CFO	Sections 9(4) and 10 of the <i>Privacy Act</i>

Dated, at the City of Ottawa, this 27<sup>th</sup> day of August, 2020.

The Honourable William Sterling Blair, P.C., C.O.M., M.P.

Minister of Public Safety and Emergency Preparedness





## Statistical Report on the *Privacy Act*

Name of institution: RCMP External Review Committee

Reporting period: 2023-04-01 to 2024-03-31

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

#### 1.1 Number of requests received

		Number of Requests
Received during reporting period		22
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
<b>Total</b>		<b>22</b>
Closed during reporting period		22
Carried over to next reporting period		0
• Carried over within legislated timeline	0	
• Carried over beyond legislated timeline	0	

#### 1.2 Channels of requests

Source	Number of Requests
Online	22
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
<b>Total</b>	<b>22</b>

### Section 2: Informal requests

#### 2.1 Number of informal requests

		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
<b>Total</b>		<b>0</b>
Closed during reporting period		0
Carried over to next reporting period		0



### 3.2 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	1
19(1)(f)	0	22.1	0	27	1
20	0	22.2	0	27,1	0
21	0	22,3	0	28	0
		22,4	0		

### 3.3 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

### 3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	1	0	0	0	0

### 3.5 Complexity

#### 3.5.1 Relevant pages processed and disclosed for paper, e-record and dataset formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
1,296	1,296	1

**3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests**

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	1	1,296	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
<b>Total</b>	0	0	0	0	0	0	1	1,296	0	0

**3.5.3 Relevant minutes processed and disclosed for audio formats**

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

**3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests**

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0

**3.5.5 Relevant minutes processed and disclosed for video formats**

Number of Minutes processed	Number of Minutes disclosed	Number of Requests
0	0	0

### 3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0

### 3.5.7 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
<b>Total</b>	0	0	0	0	0

### 3.6 Closed requests

#### 3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	22
Percentage of requests closed within legislated timelines (%)	100

### 3.7 Deemed refusals

#### 3.7.1 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









## Section 9: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

## Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

### 10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

### 10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	0	0	0
Central	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## Section 11 : Privacy Breaches

### 11.1 Material Privacy Breaches reported

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

### 11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	0
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## Section 12: Resources Related to the *Privacy Act*

### 12.1 Allocated Costs

Expenditures	Amount
Salaries	\$11,852
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
<b>Total</b>	<b>\$11,852</b>

## 12.2 Human Resources

<b>Resources</b>	<b>Person Years Dedicated to Privacy Activities</b>
Full-time employees	0.080
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
<b>Total</b>	<b>0.080</b>



## Supplemental Statistical Report on the *Access to Information Act* and the *Privacy Act*

Name of institution: RCMP External Review Committee

Reporting period: 2023-04-01 to 2024-03-31

### Section 1: Open Requests and Complaints Under the *Access to Information Act*

1.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

**1.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.**

<b>Fiscal Year Open Complaints Were Received by Institution</b>	<b>Number of Open Complaints</b>
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
<b>Total</b>	<b>0</b>

**Section 2: Open Requests and Complaints Under the *Privacy Act***

2.1 Enter the number of open requests that are outstanding from previous reporting periods.

<b>Fiscal Year Open Requests Were Received</b>	<b>Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024</b>	<b>Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024</b>	<b>Total</b>
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

**2.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.**

<b>Fiscal Year Open Complaints Were Received by Institution</b>	<b>Number of Open Complaints</b>
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
<b>Total</b>	<b>0</b>

**Section 3: Social Insurance Number**

<b>Has your institution begun a new collection or a new consistent use of the SIN in 2023-24?</b>	<b>No</b>
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**Section 4: Universal Access under the Privacy Act**

<b>How many requests were received from foreign nationals outside of Canada in 2023-24?</b>	<b>0</b>
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