

# RCMP



ROYAL CANADIAN MOUNTED POLICE

## 2022-2023

# ANNUAL REPORT TO PARLIAMENT

ADMINISTRATION OF THE  
*PRIVACY ACT*

2022-2023



Royal Canadian  
Mounted Police

Gendarmerie royale  
du Canada

Canada

© HIS MAJESTY THE KING IN RIGHT OF CANADA as represented by the Royal Canadian Mounted Police 2023

Catalogue No: PS61-42E-PDF

ISSN: 2564-2782



Royal Canadian Mounted Police Gendarmerie royale du Canada

2022-2023 ANNUAL REPORT TO PARLIAMENT

# ADMINISTRATION OF THE *PRIVACY ACT*

Canada 

## Contents

|                                                                                  |           |
|----------------------------------------------------------------------------------|-----------|
| <b>INTRODUCTION</b> .....                                                        | <b>5</b>  |
| <b>ORGANIZATIONAL STRUCTURE</b> .....                                            | <b>5</b>  |
| <i>Royal Canadian Mounted Police (RCMP)</i> .....                                | 5         |
| <i>Access to Information and Privacy (ATIP) Branch</i> .....                     | 6         |
| <i>Operational Support Stream</i> .....                                          | 6         |
| <i>Access to Information Stream</i> .....                                        | 7         |
| <i>Privacy Stream</i> .....                                                      | 7         |
| <b>DELEGATION ORDER</b> .....                                                    | <b>8</b>  |
| <b>PERFORMANCE FOR 2022-2023</b> .....                                           | <b>8</b>  |
| <i>Compliance</i> .....                                                          | 9         |
| <i>Requests Received and Closed</i> .....                                        | 9         |
| <i>Completion Time and Extensions</i> .....                                      | 10        |
| <i>Disposition of Completed Requests</i> .....                                   | 11        |
| <i>Consultations for Other Institutions</i> .....                                | 12        |
| <i>Active Outstanding Requests from Previous Reporting Periods</i> .....         | 13        |
| <i>Active Outstanding Complaints from Previous Reporting Period</i> .....        | 14        |
| <i>Section 8 of the Privacy Act</i> .....                                        | 14        |
| <b>TRAINING AND AWARENESS</b> .....                                              | <b>15</b> |
| <b>POLICIES, GUIDELINES AND PROCEDURES</b> .....                                 | <b>16</b> |
| <b>INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION</b> .....           | <b>17</b> |
| <i>ATIP Modernization</i> .....                                                  | 17        |
| <i>Additional Efforts include:</i> .....                                         | 18        |
| <b>SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS OR AUDITS</b> .....     | <b>19</b> |
| <i>Complaints and Investigations</i> .....                                       | 19        |
| <i>Section 9 – Statistical Report</i> .....                                      | 20        |
| <i>Court Action</i> .....                                                        | 20        |
| <b>MATERIAL PRIVACY BREACHES</b> .....                                           | <b>21</b> |
| <b>PRIVACY IMPACT ASSESSMENTS</b> .....                                          | <b>22</b> |
| <i>Independent Centre for Harassment Resolution (ICHR)</i> .....                 | 23        |
| <i>Babel X Platform</i> .....                                                    | 23        |
| <i>Possession and Acquisition License (PAL) Minimum Viable Product MVP</i> ..... | 23        |

|                                                                                                   |           |
|---------------------------------------------------------------------------------------------------|-----------|
| <b>PUBLIC INTEREST DISCLOSURES</b> .....                                                          | <b>24</b> |
| <b>MONITORING COMPLIANCE</b> .....                                                                | <b>24</b> |
| <b>APPENDIX A - DELEGATION ORDER</b> .....                                                        | <b>25</b> |
| <b>APPENDIX B - Statistical Report on the <i>Privacy Act</i></b> .....                            | <b>26</b> |
| <b>APPENDIX C - Supplemental Statistical Report on the <i>Access to Information Act</i></b> ..... | <b>41</b> |

## INTRODUCTION

The 2022-2023 fiscal year marks the Royal Canadian Mounted Police (RCMP)'s second year of its five-year modernization plan for its Access to Information and Privacy program. The RCMP is pleased to report some significant improvements to its performance and program overall, and is proud of its ongoing collaboration with our employees across Canada, as well as our network of partnerships with other Government of Canada departments. These improvements are also a testament to the hard work and dedication of the Branch's employees.

The biggest change to the Branch with the most impact, was the creation of three streams: Operations, Access and Privacy. By dividing the work and allowing employees in each stream to focus on their respective sections/priorities, the Branch as a whole has made important strides in compliance rates and to attract, hire and retain more staff. Employees within each stream can also better tailor their training plans and career goals to match their stream which will contribute to retention – an important goal for the Branch.

Ensuring Canadians have timely access to information so that they understand how and why the RCMP makes decisions and the challenges we face, is key to strengthening their trust in our organization. The RCMP takes these responsibilities seriously, and is committed to meeting the expectations of Canadians while protecting the integrity of the investigations undertaken on their behalf. Canadians are encouraged to monitor our work through the public website at <https://www.rcmp-grc.gc.ca/en/access-information-and-privacy-programs-modernization-strategy>.

The RCMP is pleased to outline in this annual report details of the manner in which it discharged its responsibilities in relation to the PA during the reporting period. The report is prepared and tabled in Parliament in accordance with section 72 of the PA.

## ORGANIZATIONAL STRUCTURE

### ***Royal Canadian Mounted Police (RCMP)***

In May of 2023, the RCMP marked 150 years of service as Canada's national police service. As a federal, provincial, territorial and municipal policing body, it provides federal policing services to all Canadians and policing services under contract to the three territories, eight provinces, and more than 150 communities delivered through more than 700 detachments across Canada, 600 Indigenous communities and three international airports.

The RCMP's mandate is multifaceted and includes: preventing and investigating crime; maintaining peace and order; enforcing laws; contributing to national security; ensuring the safety of state officials, visiting dignitaries and foreign missions; and, providing vital operational support services to other police and law enforcement agencies within Canada and abroad.

A commissioner leads the RCMP and is supported by a Senior Executive Committee (SEC) made up of regular members and public servants. The role of SEC is to develop, promote and communicate strategic priorities, strategic objectives, management strategies and performance management for the purpose of direction and accountability.

The organization is subdivided into 16 divisions (ten provinces, three territories, National Division, Depot and National Headquarters in Ottawa), each of which is under the direction of a Commanding Officer or Director General.

National Headquarters includes 10 business lines and is structured as follows: Federal Policing, Contract and Indigenous Policing, Specialized Policing Services, Corporate Management and Comptrollership, Human Resources, Internal Audit and Evaluation, Professional Responsibility Sector, Strategic Policy and External Relations, and Legal Services.

Work began in June 2022 on the transformation of Federal Policing, which will see the consolidation of National Division in fiscal year 2023-2024. This change fits in with the broader vision for the RCMP and Federal Policing's modernization efforts. The Federal Policing program will be shifting from the current divisional model to a regional model, whereby the country will be divided up into four Federal Policing regions. In support of regionalization and in light of National Division's dual mandates, this shift to regionalization will have an impact on the Division in its entirety.

### ***Access to Information and Privacy (ATIP) Branch***

The RCMP established the ATIP Branch in 1983, as the central contact point for matters arising from both the ATIA and PA. During the reporting period, the ATIP Branch fell within the Strategic Policy and External Relations Directorate.

With modernizing the ATIP program, significant restructuring of the ATIP Branch occurred during the reporting year. A new executive structure was created and is led by a Director General. This position is supported by three directors. Each of these directors leads a specialized team and they include: Access to Information, Privacy, and Operational Support.

The Director General acts on behalf of the head of the institution as the Departmental Access to Information and Privacy Coordinator for the RCMP. The ATIP Coordinator ensures compliance with both the spirit and the intent of the ATIA and PA, as well as all associated regulations, policies and guidelines. The Director General position is also tasked with leading the program's broad modernization efforts.

### **Operational Support Stream**

Led by a Director, the Operational Support stream is responsible for the opening, clarifying, processing and tasking of incoming requests. It further supports the Branch through the maintenance of the ATIP case management and redaction system/database, data analysis and reports on program performance. This stream also is responsible for overseeing and processing formal *Access to Information Act* or *Privacy Act* requests related to the Body Worn Camera (BWC) initiative or BWC footage contained in operational files.

When tasking requests, the Operational Support stream works closely with divisional Liaison Officers (LOs) and record holders, known as the Office of Primary Interest (OPIs). Some responsibilities of the LOs and OPIs include:

*Liaison Officers:* LOs are responsible for forwarding all ATIP requests to the appropriate personnel (i.e., OPIs) within their business lines or divisions. Other responsibilities include: tracking submissions to ensure responsive records are sent by OPIs to the ATIP Branch; ensuring responses are on time; and, documenting and communicating internal RCMP ATIP processes to all who facilitate the processing of requests.

*Office of Primary Interest:* As the record holders, some of the OPIs' responsibilities include: providing electronic copies of the responsive records; reviewing records for duplication; ensuring that the information falls within the scope of the request; notifying the ATIP Branch if records are voluminous; and, advising the Branch or LO if an extension is required.

As mentioned above, with the introduction of a significant operational change and the division of the ATIP Branch into three specialized streams (Operational Support, Access to Information and Privacy), the Branch has allowed for a more functional streamlined process and better specialized growth opportunities for its analysts. The change also enables greater development for employees new to the ATIP community and for those wishing to continue in this field. Creating the two disclosure streams has allowed analysts to become experts in the specific fields and with the type of records processed in applying the Acts and Regulations. It is also providing for a more consistent approach and stronger relationships with LOs, OPIs and external stakeholders. To highlight, the RCMP received numerous ATIP requests and consultations related to the Freedom Convoy. With the new streams, the ATIP Branch was able to assign one analyst to review and respond to all convoy related requests. This new approach ensured uniformity to the processing and review of records as the analyst had a thorough knowledge of the previous records processed. This approach ultimately resulted in a quicker turnaround time in processing, reviewing and completing requests.

### **Access to Information Stream**

Led by a Director, the Access stream is responsible for responding to all formal requests made under the ATIA. This stream is made up of four disclosure teams, each with an area of expertise. The first team focuses on the on-time requests, helping the RCMP meet its obligations under the Act. The second team specifically looks at the most dated backlog files in order to reduce the risk associated with these dated requests. A new team, made up of highly experienced analysts, has been formed to address sensitive investigations which may require extensive consultations or unique knowledge in order to process. The fourth team is responsible for reviewing and responding to complaints received through the Office of the Information Commissioner (OIC).

The Access Stream led the overall coordination of the proactive publication requirements of Bill C-58 for the RCMP and continues to work with sections responsible for producing briefing materials and reports in order to ensure the RCMP meets the legislative requirements.

### **Privacy Stream**

Led by a Director, the Privacy stream has two units responsible for processing personal information requests and supporting compliance of the RCMP's program delivery with the provisions of the PA and the policies and directives of the Treasury Board of Canada Secretariat (TBS).

**Privacy Disclosure Unit:** This unit processes all formal requests under the PA. Currently there are two teams dedicated to the review and processing of requests for personal information. Another team reviews and responds to complaints received through the Office of the Privacy Commissioner (OPC).

**Privacy Policy Unit:** Privacy Policy Unit is divided into two interrelated but distinct teams: Privacy Client Engagement and Outreach team and the Privacy Compliance and Governance team.

These dedicated professionals provide policy advice and expertise to the RCMP on privacy-related issues, including: providing recommendations to conduct Privacy Impact Assessments (PIAs), supporting in



drafting those PIAs, reviewing RCMP agreements and contracts (e.g. MOUs, ISAs, RFPs), and assisting with the investigation of privacy breaches and complaints under sections 4-8 of the PA. In addition, the team reviews and creates internal policies that reflect TBS policy, directives and guidance as well as expectations from the Office of the Information Commissioner (OIC) and Office of the Privacy Commissioner (OPC). The team works to ensure the RCMP is meeting its obligations as described in section 4.2 of TBS's Policy on Privacy Protection and the *Privacy Act*.

## DELEGATION ORDER

The Departmental ATIP Coordinator has full authority to administer the legislation. A copy of the signed Delegation Order is included in [Appendix A](#). Of note, due to the reorganization of the Branch (see Section 6), this delegation order is being updated to reflect the new operational structure.

## PERFORMANCE FOR 2022-2023

This section provides an overview of the RCMP's performance with respect to records requested under the PA for the 2022-2023 reporting year. The completed statistical report is found in [Appendix B](#) and the supplemental statistical report is found in [Appendix C](#).

The ATIP Branch remained operational during FY 2022-2023 reporting period; there were no significant impacts on ATIP performance attributable to COVID-19. It continued to work closely with its partners and stakeholders in finding solutions and reviewing processes to ensure that it responded to Canadians' requests in a satisfactory and timely manner. However, it continued to face challenges that resulted in response delays to requests submitted. Despite its legislative responsibilities, certain realities prevented the RCMP from responding on time.

During the reporting period, some delays were attributable to the following:

- operational requirements that called for RCMP members and employees to be redeployed for instance: natural disasters like wildfires and flooding, significant investigations (Mass Casualty Commission, Freedom Convoy activities, police assistance for pipeline projects), and major events such as the papal visit, to name a few;
- the RCMP still relies heavily on paper-based processes, with records that have not been digitized;
- the extensive search required (more than 750 locations throughout Canada); and
- the lack of experienced ATIP analysts.

The RCMP recognizes the importance of complying with legislated timelines. That is why it continues to overhaul its program and address these issues by:

- devoting resources to improve the timeliness of responses;
- modernizing/streamlining policies and procedures within the program to enhance operational efficiency; and
- expanding training and awareness campaigns for RCMP personnel to ensure they understand the obligation to respond within legislated timeframes.

*Compliance*

The ATIP Branch saw an increase in compliance for the number of requests closed within the legislated time frames under the PA. In the 2022-2023 fiscal year, compliance increased to 55% from 46.1% in the previous fiscal year. The increase is due, in part, to modifications in processes within the Branch, resulting in efficiencies, increased efforts in human resources (staffing, training, retention) and the utilization of contractors to complete complex late files in order to address legislative compliance.

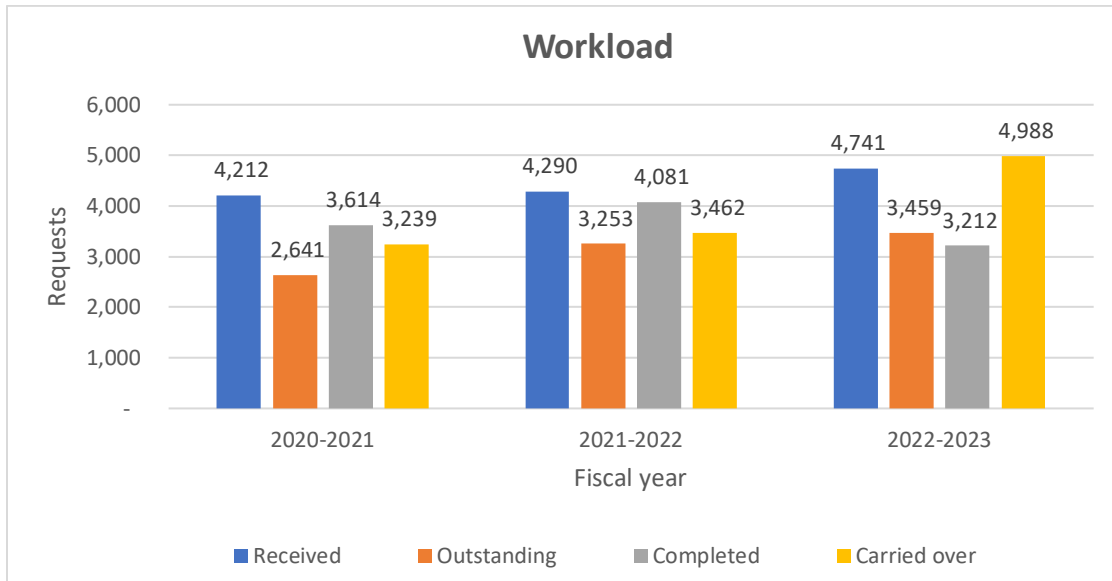
*Requests Received and Closed*

As noted in the Statistical Report in [Appendix B](#), the RCMP received a total of 4,741 new requests under the PA in 2022-2023. In addition, there were 3,459 requests outstanding from the previous reporting periods for a total of 8,200 requests. Of these, 3,212 requests were completed and 4,988 carried over to the 2023-2024 fiscal year.

Privacy requests cover the personal information of requesters in a variety of records, including information on police operational files, such as motor vehicle accidents, and employment files.

As demonstrated below, there has been an increase in the number of requests received compared to the previous reporting period. The number of requests received increased by 10% compared to the previous fiscal year and increased by 12.5% compared to the 2020-2021 fiscal year.

The graph also demonstrates that the number of requests closed this reporting period decreased by 21% compared to the previous fiscal year. The decrease can be attributed to realignment of resources mid-year to the formal Privacy Stream, where most of the team’s efforts were focused on compliance, completing complaint files and building capacity (recruitment and training).



*Completion Time and Extensions*

The ATIP Branch completed 1,079 (34%) requests in 30 days or less. During the reporting period, 678 (21%) requests were completed within 31-60 days, 302 (9%) were completed in 61-120 days, and 1,153 (36%) were completed in more than 120 days.

Section 15 of the PA allows institutions to extend the statutory time limits to respond to a request beyond 30 days.

For the requests closed during the 2022-2023 reporting period, the RCMP sought a total of 2,527 extensions under section 15(a)(i), which pertains to unreasonable interference with operations.

No extensions under section 15(a)(ii) were taken for consultations.

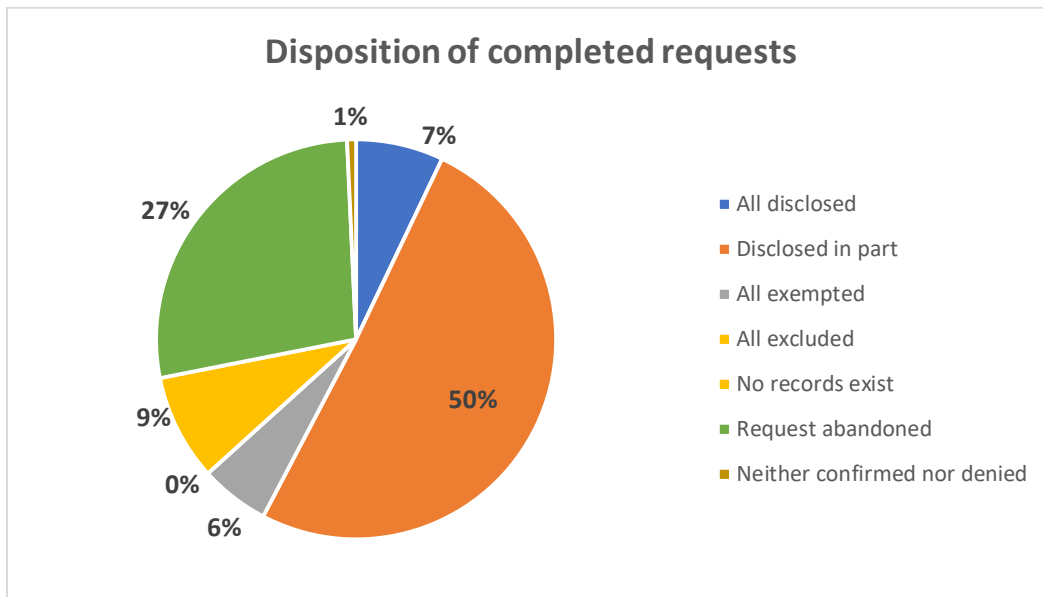


### Disposition of Completed Requests

Of the 3,212 requests completed in the 2022-2023 fiscal year, the dispositions of completed requests were as follows:

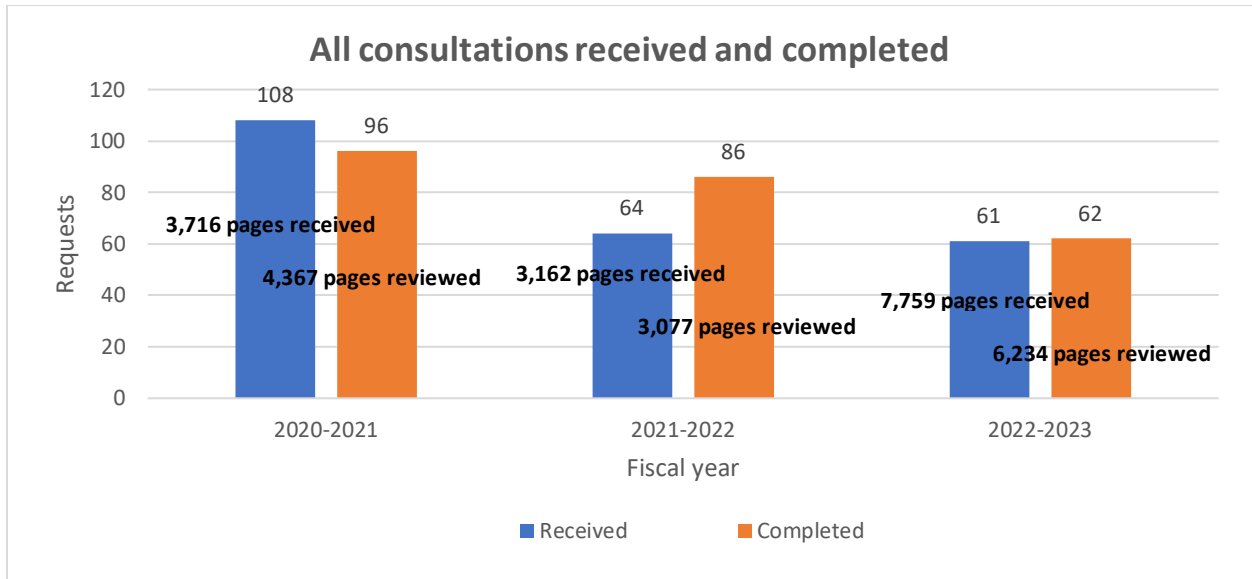
- 1,608 (50%) requests were disclosed in part;
- 870 (27%) requests were abandoned by requesters;
- 308 (9%) requests had no records located;
- 225 (7%) requests were fully disclosed;
- 178 (6%) requests had all material exempted;
- 23 (1%) requests were neither confirmed nor denied; and,
- 0 (0%) requests had all material excluded.

\*Percentages have been rounded and do not add up to 100



*Consultations for Other Institutions*

The number of consultations received and completed over the last three reporting periods has decreased significantly, which could possibly be a result of COVID-19 pandemic restrictions. During the current reporting period, the RCMP completed 62 consultations, totalling 6,234 pages reviewed. Of the 62 completed consultations, 42 were received from other Government of Canada institutions and 20 were received from other organizations.

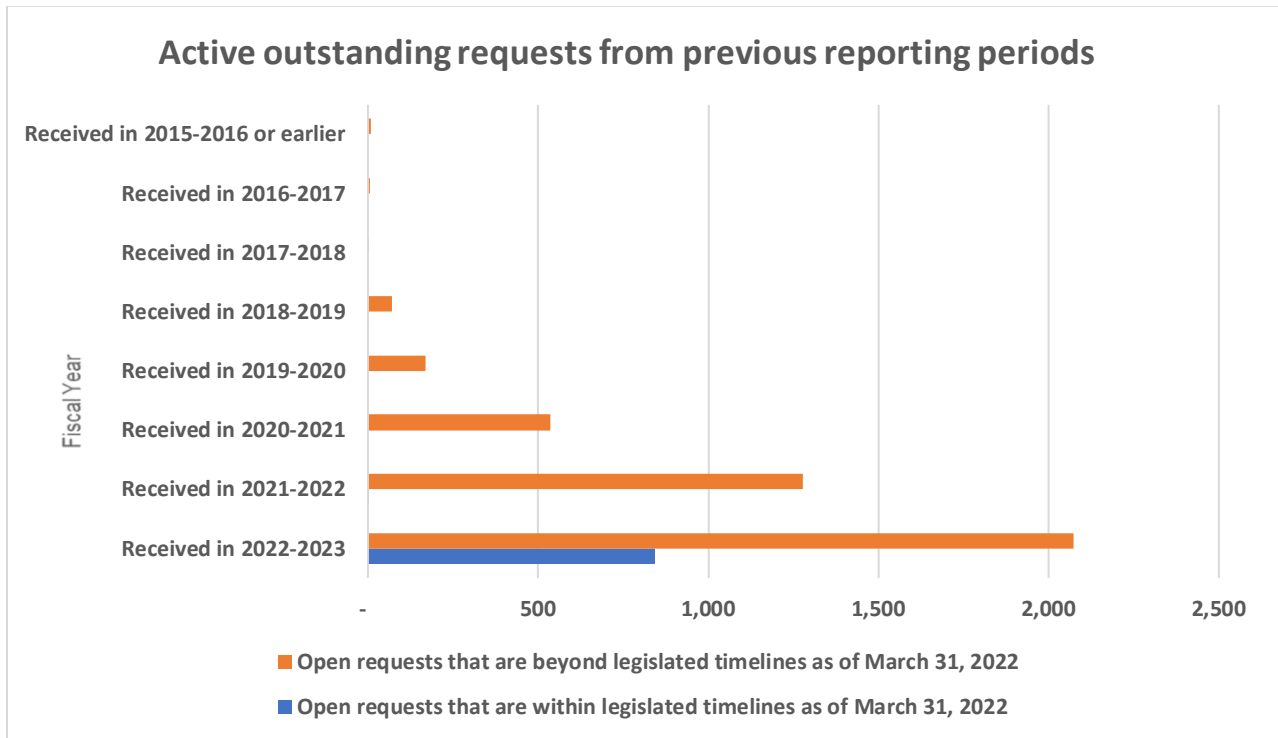


*Active Outstanding Requests from Previous Reporting Periods*

At the conclusion of the 2022-2023 fiscal year, a total of 4,988 requests were outstanding. Of those outstanding, 29% were carried over within legislated timelines, and 71% were carried over beyond legislated timelines. The fiscal years where the carried over requests were received in are as follows:

- 2,916 (59%) received in 2022-2023;
- 1,280 (26%) received in 2021-2022;
- 535 (11%) received in 2020-2021;
- 169 (3%) received in 2019-2020;
- 71 (1%) received in 2018-2019;
- 3 (less than 1%) received in 2017-2018;
- 6 (less than 1%) received in 2016-2017;
- 8 (less than 1%) received in 2015-2016 or earlier.

\*percentages have been rounded and do not add to 100

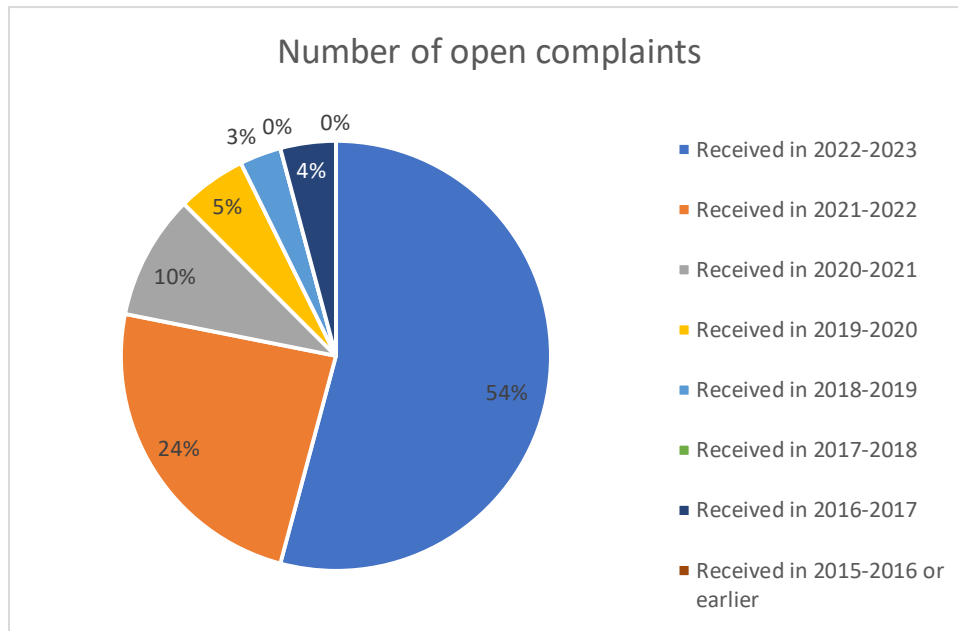


*Active Outstanding Complaints from Previous Reporting Period*

At the conclusion of the reporting period, a total of 96 complaints were outstanding. The fiscal years where the outstanding complaints were received in are as follows:

- 52 (54%) received in 2022-2023;
- 23 (24%) received in 2021-2022;
- 9 (10%) received in 2020-2021;
- 5 (5%) received in 2019-2020;
- 3 (3%) received in 2018-2019;
- 0 (0%) received in 2017-2018;
- 4 (4%) received in 2016-2017;
- 0 (0%) received in 2015-2016 or earlier.

\*percentages have been rounded and do not add up to 100



*Section 8 of the Privacy Act*

In relation to legislative requirements for disclosure of personal information in accordance with Section 8 of the *Privacy Act*, the ATIP Privacy Policy Unit (PPU) reviewed 711 pages relating to para. 8(2)(f) disclosures, processed 13 para. 8(2)(e) disclosures, 41 para. 8(2)(m) disclosures and continued to provide advice and guidance on all other Section 8 provisions. Further, in addition to the work of the PPU highlighted in the specific sections below, the unit continued to support the organization by responding to 185 privacy policy related inquiries.

## TRAINING AND AWARENESS

Continuous learning is a priority for the RCMP and the ATIP Branch is no exception. ATIP Branch staff are encouraged to seek out relevant courses and other learning opportunities as a means to enhance their knowledge and to improve their skills.

For the 2022-2023 reporting year, the ATIP Branch held regular information-sharing sessions where staff discussed files and shared best practices. As new technological tools were introduced to support remote collaboration during the pandemic, the RCMP was able to leverage these tools (particularly videoconferencing) to provide a number of training sessions to employees. In-house training and orientation were provided to new ATIP operational support staff and virtual training was provided to OIC investigators on the structure and mandate of the RCMP, the information management team in B Division (Newfoundland), the Province of British Columbia's Information Access Operations Council, and the RCMP Human Source Unit, among others. In total, 11 training sessions were given to 829 employees.

As part of the modernization efforts, the ATIP Branch began the first of a multi-year plan to visit every division in person. These visits will provide an opportunity for the ATIP Branch, along with its partners to enhance communications by meeting directly with record holders to discuss concerns, meet with divisional management to reiterate the importance of compliance with the ATIA and the PA (including getting privacy right), and to offer training sessions to divisional personnel. As part of the divisional visits, the Privacy stream worked with counterparts in Departmental Security and the National Technology Onboarding Program (NTOB) to carry out presentations and awareness sessions, focusing specifically on privacy breaches, data security and the onboarding of new technology. In this reporting period, presentations were organized with National Division (Ottawa), O Division (Ontario) and E Division (British Columbia), reaching over 1,000 employees at all levels, including RCMP senior leaders in the divisions. These visits also served to strengthen the bonds between the ATIP Branch and our divisional LOs, the benefits of which can be seen on a daily basis. Plans are underway to continue these visits in the coming reporting period.

The ATIP Privacy Policy Unit (PPU) continued to provide training and presentations to internal partners and offices of primary interest, specifically in relation to privacy breaches and conducting privacy impact assessments. Two presentations were provided on privacy breaches involving 32 participants, and three presentations were provided on conducting privacy impact assessments involving 22 participants. The unit also made efforts to emphasize the importance of privacy to RCMP senior leaders throughout the 2022-23 fiscal year.

For the 2022 Privacy Awareness Week, the PPU conducted two organization-wide events including a trivia challenge to bolster privacy awareness, and a speaking event on privacy breaches in conjunction with the OPC. Both events were very successful drawing in 102 participants and 287 participants, respectively.

In an effort to encourage growth and retention in the ATIP Branch, a developmental program was approved and adopted. This program is designed to build new ATIP analysts from the ground up. In such a highly competitive field, it is important to offer employees opportunities to grow and further develop their skills. The professional development program will bring employees from a PM-01 level to a PM-04 as senior analysts.



During the previous reporting period, the ATIP Branch, in conjunction with the RCMP's Learning and Development Unit, created the *Access to Information and Privacy Fundamentals* online course available to all RCMP employees. In addition to increasing their knowledge of the ATIA and the PA, this course also provides employees with a better understanding of their responsibilities when responding to information requests and best practices when managing personal information. In 2022-2023, over 1200 new RCMP employees successfully completed the course.

ATIP divisional LOs also provided presentation sessions to their record holders (OPIs). The sessions included an overview of ATIP modernization, employee's roles and responsibilities and a list of resources. Discussions during the presentation also quelled misunderstandings regarding the process, while reinforcing proper information management. Specifically, J Division (New Brunswick) provided 16 sessions with attendance of almost 150 employees.

## **POLICIES, GUIDELINES AND PROCEDURES**

Throughout this reporting period, the ATIP Branch continued to modernize and update internal policies and procedures to ensure alignment with current reporting standards. These changes will continue to be developed and instituted in the 2023-2024 reporting period.

During 2022-2023, the ATIP Branch accomplished the following:

- Enhanced internal processes for facilitating the transfer of files within the RCMP, including the creation of national shared drives for classified information;
- Updated the ATI, Privacy and Operations teams' standard operating procedures, which was part of the ATIP Branch's efforts to formalize internal processes;
- Modified guidelines to address its on-time and backlog files, enabling processing efficiencies;
- Worked with business lines and divisional LOs to develop guidelines, standards and awareness communiques to further facilitate RCMP ATIP modernization, and implemented new regular by-weekly meetings to resolve challenges as quickly as possible;
- Continued to lead the interdepartmental working group for the development of business continuity plans specifically for ATIP programs, which led to greater information sharing among the participating departments;
- Reviewed employee work arrangements and implemented a hybrid work model for its employees, allowing more flexibility in turns of work-life balance;
- Weekly meetings held with ATIP Branch, RCMP Communications, and Parliamentary Affairs ensured the organization was able to properly brief the Commissioner and Minister's office should questions arise. The meetings also provided insight to the ATIP Branch of topics that generated media interest and would result in requests;
- Successfully piloted the temporary hiring of employees from across the country who can work remotely, to support the divisions;
- Onboarding remote employees as part of ATIP Branch modernization to increase the pool of ATIP experienced employees outside of the National Capital Region; and
- Development of new operational policies for unique types of materials. As an example, a new directive has been approved by ATIP Branch and the Human Source Unit on how to process request containing source information.

Our divisional LOs are also working to establish processes and workflows. Specifically, E Division (British Columbia) is building their team, creating shared proxy accounts for ATIP requests for over 40 units/detachments, leveraging collaboration tools for improved communications and ensuring consistent

and streamlined processes while building a stronger governance framework. As well, F Division (Saskatchewan) assisted with the development of privacy notice statements and questionnaires and reviewing MOUs and coaching junior staff.

Additionally, the Privacy Policy Unit (PPU) completed the following:

- Continued work on development of standard operating procedures, updated policies and its privacy framework, as well as efforts towards restructuring RCMP personal information banks (PIBs).
- Completed a review of its policy and guidance documents on Privacy Impact Assessments (PIAs). The new guidance documents include a detailed PIA Handbook, a high-level PIA Guide, and an updated interim PIA Template.
- Developed internal Standard Operating Procedures (SOPs) on Privacy Impact Assessment Questionnaires (PIAQs) in accordance with Treasury Board guidance and directives on privacy.
- Updated internal SOPs relating to privacy breaches and complaints received in relation to Section 4-8 of the *Privacy Act*. In addition, to ensure the organization is provided with timely and useful advice, the PPU developed an internal SOP for responding to inquiries.

## INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION

### *ATIP Modernization*

In November 2020, the Information Commissioner of Canada released the results of a systemic investigation of the RCMP's ATIP program, entitled *Access at issue: The need for leadership*. The report was highly critical of the RCMP's ATIP program and identified 15 recommendations for improvement. Subsequently, the Minister of Public Safety issued a Direction to the RCMP to action the recommendations of the OIC's review and submit a strategy outlining a way forward to be developed in consultation with the TBS. In response, the RCMP developed a strategy entitled *Access Granted: Restoring Trust in the RCMP's Access to Information Program*, supported by an action plan, outlining initiatives to modernize the program.

The RCMP began implementation of the strategy in the previous reporting period and is committed to seeing it through over the course of the next several years. The objective is to increase compliance rates and enhance public transparency. The RCMP posted the strategy, and is providing quarterly updates on the RCMP external website, and we encourage all Canadians to visit the site and monitor our progress at <https://www.rcmp-grc.gc.ca/en/access-information-and-privacy-programs-modernization-strategy>.

Over the reporting period, the RCMP continued to make progress in implementing the strategy. While more details can be found on our external website, some key initiatives include:

**Ongoing work enhancements:** The RCMP continued to engage PricewaterhouseCooper (PwC) to assist with its modernization efforts. During the reporting period, new approaches designed to support culture and business process changes (e.g. introduction to new skills and tools for day-to-day work) have been implemented. Branch sustainability plans were also created and are monitored monthly and updated quarterly. A change management plan was also developed that identified new opportunities to promote and push change throughout the RCMP. Stakeholders also provided positive feedback on the modernization efforts.

**Restructuring and hiring blitz:** As previously noted, the ATIP Branch has begun implementing a significant restructure and reorganization to ensure that it is bringing the necessary resources and leadership to meet its obligations under the ATIA and the PA. The new structure separates the ATIP Branch into three streams: Access to Information (responsible for meeting ATIA obligations); Privacy (responsible for meeting PA obligations); and, Operational Supports (responsible for providing critical support services for the entire Branch, such as intake, systems maintenance and data reporting and analysis). Each stream is led by a director, with the Branch now reporting to a Director General. These changes are bringing new personnel into the Branch with the ultimate objective of almost doubling its size over the next four years. As part of its continued modernization efforts, the Branch is looking for people from a variety of places in order to meet its staffing needs. Staffing efforts in all areas, including indigenous recruiting, has resulted in growth from approximately 65 employees to almost 90 by the end of the reporting period. The Branch currently receives funding to staff about 118 positions with a projected organizational chart of 137 staff. For the 2023-24 fiscal year, it will focus on staffing all funded positions.

**Focusing on training:** As part of broader modernization efforts, the ATIP Branch continued to promote the online ATIP Fundamentals training course to personnel, which resulted in a positive enrollment rate. The ATIP Branch also provided presentations to RCMP employees in four different divisions and divisions provided internal training to their OPIs. Additional efforts continue on the development of new training and course offerings for ATIP Branch personnel and the broader organization that will be in place for the next reporting period. In fact, expanding training delivery forms a key part of the Branch's human resources strategy for ATIP modernization, succession planning, and employee retention.

**Sharing best practices:** ATIP modernization is underway across the Government of Canada. In order to ensure that the RCMP continues to benefit from the lessons learned and work underway by its partners, and that partners were aware of work underway at the RCMP, the RCMP remains the lead of an interdepartmental working group to exchange best practices and identify areas for collaboration. Some of the topics discussed have included onboarding of new employees, key performance indicators and improved streamlining practices.

*Additional Efforts include:*

- As part of the RCMP's response to major events such as the Freedom Convoy in Ottawa and the police assistance for pipeline projects in BC, the ATIP Branch assigned key analysts who work directly with the record holders to retrieve relevant records. This provided a consistent and quick response due to their complete and unique knowledge of the records.
- The ATIP Branch was involved in the implementation of the Mass Casualty Commission's recommendations following the events in Portapique, Nova Scotia. Advice and guidance were given to ensure the RCMP's response was more open and transparent from the onset.
- Technology is fundamental to ATIP's ability to meet its obligations under the Acts. The Branch is exploring such options including new case management software, the use of automation, and cloud computing to find efficiencies to improve our response times.
- Money and technology were provided to divisions/LOs to enhance their ATIP capabilities with the goal of creating divisional ATIP bureaus.
- The ATIP Branch regularly works with the RCMP's Audit and Evaluation unit to conduct informal reviews of audits/reports prior to their publication.
- Following a Ministerial Directive, the ATIP Branch continues to support the RCMP's Management Advisory Board by conducting informal reviews prior to the publication of their recommendations which supports internal reform while remaining transparent with the public.

During fiscal year 2022-2023 the PPU continued to strengthen its relationship with the newly conceived National Technology Onboarding Program (NTOP). As part of this relationship building, both units worked together to develop a RASCI Matrix (Responsible, Accountable, Supportive, Consulted, Informed), which clarifies and defines roles and responsibilities when working with RCMP offices of primary interest.

In addition to NTOP, the PPU strengthened its relationship with other key internal stakeholders, such as the IM/IT section, GBA Plus Centre of Expertise and the MOU Policy Centre. The PPU now meets regularly with these partners to share information and expertise, and to ensure there are no gaps relating to privacy for the organization.

Nearing the end of this reporting period, the RCMP joined the TBS AOMT portal. This portal allows applicants to submit their requests under both the ATIA and the PA online, directly to the institution, upload any required supporting documentation, and even receive their release packages online. This move towards digital requests and responses has improved the service ATIP offices have been able to provide to our clients.

As part of the RCMP Vision 150 and the ATIP Office's own modernization efforts, there is an extensive privacy and security awareness training strategy under development; including but not limited to:

- Development and sharing of breach and PIA management tools;
- Executive leadership deck has been created and is now in circulation;
- Increase of privacy resources in the Privacy Policy Unit from 3 to 11 since January 2022 with a planned increase to a total of 14 resources to support the RCMP and all things privacy policy related. Dedicated Client engagement and outreach team, as well as a Privacy compliance team; all with an effort to increase privacy compliance, education, awareness and support to the RCMP.

## **SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS OR AUDITS**

### *Complaints and Investigations*

During this reporting period, the RCMP continued to work collaboratively with the OPC to address complaints as efficiently as possible. As part of the modernization strategy, a team of analysts dedicated specifically to review and respond to complaints received through the Office of the Privacy Commissioner (OPC), was created to enable the RCMP to respond more efficiently to complaints.

#### **Clearview AI**

In June 2021, the OPC conditionally resolved, pending implementation of recommendations, their investigation into the RCMP's use of Clearview AI. Given the extensive work required, the OPC granted the RCMP until March 31, 2022 to implement all recommendations.

Over the course of fiscal year 2022-23, PPU and NTOP worked diligently to provide the OPC's Compliance Monitoring team with briefings on key updates, which occurred during monthly meetings and submitted all requested documentation to OPC by their deadline.

On March 30, 2023, the OPC advised the RCMP that they were satisfied that their recommendations were implemented and closed their file. Moreover, the OPC applauded the RCMP's engagement and

commitment in addressing the issues highlighted by this complaint and the efforts undertaken to create a more privacy-conscious culture in the organization.

### **Disclosure complaint – Office of the Coordination of Grievances and Appeals (OCGA)**

Following a review of incidents brought forward by an RCMP employee's experience as an appellant with the Office of Coordination of Grievances and Appeals (OCGA), the PPU engaged closely with the OCGA to address gaps in policy and procedures to ensure that the program was well aligned with the *Privacy Act* and related TBS policies. As a result, the program committed to improve guidelines on roles and responsibilities in reporting suspected privacy breaches, improve language concerning privacy protection and obligations in the National Guidebook – Grievance Procedures, and revise privacy notices in standard forms and correspondence. This collaborative work serves as an example of how our leadership in bringing privacy awareness to the forefront of the organization has a direct and positive impact on cornerstone programs with complex processes involving personal information.

### **Informal Engagement on the *Emergencies Act***

While not a formal complaint, the RCMP, along with other departments, participated in informal engagement with the OPC concerning the *Emergencies Act*, which the OPC expects to publish in Spring 2023.

### *Section 9 – Statistical Report*

Section 9 of the Statistical Report, found in [Appendix B](#), provides data on the complaints received and closed. Specifically, for the 2022-2023 reporting period, the RCMP received and provided the following under the PA:

**Section 31** – the RCMP received 224 - Section 31 notices, which represents 7% of all requests closed during the reporting period. The majority of the complaints received related to delays and deemed refusals, which can be attributed to the ongoing RCMP backlog and to the complex and/or voluminous nature of requests. Under this section, the OPC formally notifies the institution of their intent to investigate a complaint received.

**Section 33** – the RCMP received 42 - Section 33 notices. Under this section, the OPC requests representations from both the complainant and the institution pursuant to an ongoing complaint investigation.

**Section 35** – the RCMP received 129 - Section 35 notices. Under this section, the OPC issues a finding report, which may include recommendations, for founded complaints upon the conclusion of the investigation.

### *Court Action*

There were four (4) court proceedings actioned with respect to privacy requests processed within fiscal year 2022-23, and one (1) was discontinued/concluded and dismissed in this reporting period.

## MATERIAL PRIVACY BREACHES

As Canada’s national police force, the RCMP is trusted to handle and protect the personal information of Canadians with professionalism and integrity, a job it takes very seriously. To safeguard the personal information in its care, the RCMP has strict policies and procedures in place to prevent unauthorized access and disclosure across the organization, however even with these rigorous procedures in place, privacy breaches still occur, often, as a result of human error. With every privacy breach, the RCMP takes steps to improve its processes to ensure that similar incidents do not occur again.

When a privacy breach is detected, the RCMP Access to Information and Privacy Branch follows the Treasury Board of Canada Secretariat’s guidelines to determine the privacy risks and reports all breaches, deemed material, to the OPC and the Treasury Board of Canada Secretariat (TBS).

During fiscal year 2022-2023, the PPU received and reviewed 121 possible privacy breach reports of which eight (8) were deemed material and reported to the OPC and TBS, 81 were deemed non-material, nine (9) were determined to not be privacy breaches, two (2) were transferred to the originating department for further investigation and 21 are ongoing.

### **Material privacy breach summaries:**

1. An employee of the Kensington Police Service used the Police Reporting and Occurrence System (PROS) database to run unauthorized PROS checks for two individuals. The affected individuals notified the RCMP after their applications were declined by the Atlantic Police Academy. The Unit reviewed policy on acceptable user practices and the statement of agreement with the employee and performed audits to determine the usage of the data being accessed.
2. A briefcase containing five operational case files was stolen from the car of an employee at their residence. These files concern active criminal investigations of serious offences where forensic analysis was required. In order to prevent a recurrence, it was recommended that the Unit management review security and information management practices regarding hardcopy material transported or used outside of RCMP secure offices with every employee. As well as ensuring all employees working from home have a valid telework agreement in place and have taken steps to assure a safe and appropriate workspace in their homes. A review of program directives and protocols regarding protection of personal information to assure they are aligned with privacy legislation and TBS’s policies was also done. Affected individuals were notified of the privacy breach.
3. An unencrypted USB containing sensitive operational and personal information was lost by an RCMP member and then found by an unknown individual who made and disseminated copies of it. Due to the nature of the contents of the USB key, there were a total of 1,741 individuals whose personal information was involved by the breach. 616 people were notified of the privacy breach either by letter, by phone or in person depending on the level of risk and sensitivity of the information and some safety measures were implemented for certain individuals. All detachment membership to be re-educated on policies pertaining to the handling of protected information.
4. USB key lost in public area containing disclosure file to Crown pertaining to an investigation and confidential informant. Recommendation for an internal review of the policies and procedures surrounding the handling of sensitive investigative material and methods of delivery to the Prosecution

or any external partners involved as recommended to the unit. Affected individuals were notified of the privacy breach.

5. An unencrypted USB containing information about a homicide investigation was lost by a member and has not been recovered. Notifications to the affected individuals were made. Recommendation to implement the use of encrypted USB keys as well as recommend an internal review of the policies and procedures surrounding the handling of sensitive investigative material and methods of delivery to the investigational counterparts was suggested to the unit.

6. Lost USB key containing RCMP member annual assessments of employees and former employees was lost at the Central Alberta District (CAD) Headquarters Office. The entire district office was then searched by all employees with each workstation, laptop bag and file being search. The USB has not been located and USB devices are no longer used within the CAD office to store or transfer this type of information. Some of the affected individuals have been notified.

7. Unauthorised audio tape recording on a personal device of an April 28 2020 meeting between the RCMP Commissioner and H Division (Nova Scotia) Communications and other Senior Officials. The employees at the meeting were not informed of the audio recording. RCMP's Management team was made aware of the recording in July of 2022 during one of the Mass Casualty Commission (MCC) witness testimonies where an RCMP employee stated that a recording was made, but was no longer available. A Public Interest Disclosure related to the recording was made in July informing the public that the employee's actions were under investigations. Affected individuals were informed of the privacy breach.

8. An RCMP member's name was mistakenly released in an ATIP request release package in connection with his code of conduct investigation. The affected individual has been notified and the unintended recipient has returned the release package and a new release package was resent to the requester.

The unit is continuing to provide training to all employees, a discussion has also been had with Team leaders and contractors discussing the importance of disclosure processes and policies.

## **PRIVACY IMPACT ASSESSMENTS**

During the reporting period, the RCMP completed three Privacy Impact Assessments (PIAs). PIAs for the Independent Centre for Harassment Resolution (ICHR), Babel X Platform, and Canadian Firearms Program Online Possession and Acquisition License Minimum Viable Product (PAL MVP).

Three new PIAs were submitted to the ATIP Branch during the reporting period. In addition, three PIAs were carried forward from the fiscal year 2021-22. All six PIAs received an initial review by the PPU. Additionally, the PPU reviewed 69 PIA questionnaires to determine the need for a PIA, ten Treasury Board Submissions, three Memorandum to Cabinet, two statements of work/requests for proposal to ensure privacy requirements are included in contracts, and 27 Memorandum of Understanding.

The ATIP Policy Unit engaged in two consultation sessions with the Office of the Privacy Commissioner (OPC). The first consultation session was regarding the Covert Access and Intercept Team (CAIT) and their work towards a program-level PIA, which will cover the RCMP's use of On Device Investigative Techniques (ODITs). The ATIP Policy Unit continues to work with CAIT on their PIA, and expects that it will be submitted to the OPC by the summer 2023. The second consultation session with the OPC involved an MOU to share

information with the Law Society of Ontario regarding alleged attorney misconduct found in the course of an investigation.

In addition to consultation meetings, the ATIP Policy Unit continues to meet with the OPC to provide updates on key files on a bi-monthly basis.

#### *Independent Centre for Harassment Resolution (ICHR)*

During the reporting period, the RCMP completed a PIA on the Independent Centre for Harassment Resolution (ICHR). The ICHR was launched to implement the RCMP's new work place harassment and violence prevention and resolution regime in light of the changes to the *Canada Labour Code Work Place Harassment and Violence Prevention Regulations*. The ICHR is a centralized, independent unit responsible for matters relating to the resolution of work place harassment and violence occurrences for RCMP employees. The ICHR handles the intake and processing of complaints, case analysis, informal resolution and investigation referrals, as well as monitoring of the work place restoration measures. Additional information is included in the Executive Summary published here: [Privacy Impact Assessment Executive Summary | Royal Canadian Mounted Police \(rcmp-grc.gc.ca\)](https://www.rcmp-grc.gc.ca/en/privacy-impact-assessment-executive-summary)

#### *Babel X Platform*

The RCMP completed a PIA on its use of the Babel X platform and submitted this PIA to the OPC. The Babel X platform allows users to locate and isolate publicly available information from social media sites, blogs, forums, news, and other on-line channels. Through this PIA the RCMP describes and documents the safeguards in place to protect privacy when collecting open source information using this tool. Based on its assessment, privacy impacts associated with the collection, use, disclosure and retention of open-source information by the RCMP from social media and other internet sites using the Babel X platform are expected to be moderate. Recommendations from the privacy impact assessment process, once fully adopted, are expected to reduce those risks to a low (or acceptable) level. Additional information is included in the Executive Summary published here: [Babel X platform | Royal Can https://www.rcmp-grc.gc.ca/en/babel-x-platform](https://www.rcmp-grc.gc.ca/en/babel-x-platform)

#### *Possession and Acquisition License (PAL) Minimum Viable Product MVP*

The RCMP's Canadian Firearms Program (CFP) completed a PIA for the online submission of new Possession and Acquisition License (PAL). This project is part of the modernization of the CFP business practices to significantly reduce paper-based processes and improve service delivery with the development of digital solutions. The CFP adopted a privacy by design approach which permitted the integration of privacy engagements throughout the development and design of the solution. The PIA identified four (4) low to medium risks. The CFP committed to addressing outstanding risks by the end of fiscal year 2022/2023 at the latest. Additional information is included in the Executive Summary published here: [Canadian Firearms Digital Services Solution – phase 1 – online Possession and Acquisition Licence portal Privacy Impact Assessment | Royal Canadian Mounted Police \(rc https://www.rcmp-grc.gc.ca/en/canadian-firearms-digital-services-solution-phase-1-online-possession-and-acquisition-licence-portal](https://www.rcmp-grc.gc.ca/en/canadian-firearms-digital-services-solution-phase-1-online-possession-and-acquisition-licence-portal)



## PUBLIC INTEREST DISCLOSURES

During the 2022-2023 fiscal year, 42 disclosures were made pursuant to paragraph 8(2)(m) of the *Privacy Act*. The majority of disclosures were related to the duty status of charged RCMP members and the release of dangerous offenders into communities across Canada. However, in two cases disclosures were made relating to exceptional circumstances. In those two cases, the OPC was notified in advance and in all other cases, the notifications were made after the fact.

## MONITORING COMPLIANCE

The ATIP Branch monitors compliance through weekly and monthly statistical reports, which include the compliance rate, the number of files completed on time and those that are delayed, as well as complaints both received and closed. New for this reporting period is the monthly and quarterly reporting of number of PIAs and material breaches received by the ATIP Office and subsequently submitted to the OPC. Performance Dashboards are also key tools to further identify trends and assist the ATIP Branch in strategically developing efficiencies. The Branch's management team reviews the weekly and monthly reports to manage workload and to determine any upcoming issues where processes could be improved. The reports and dashboards are provided to the RCMP's Strategic Policy and External Relations Officer and the Commissioner in an effort to improve accountability.

The ATIP Branch continues work on bolstering its data reporting function by onboarding new technology and processes. This new technology will enable the ATIP Branch to be more strategic and transparent, by automatically capturing pertinent data to assist with its planning and public reporting as well as to identify areas where efficiencies may be found.

In addition, the PPU helps ensure appropriate privacy protections are included in contracts, agreements and arrangement for the organization when they involve the collection, use or disclosure of personal information. The PPU works closely with the MOU Policy Centre, which is responsible for supporting and monitoring these documents, to ensure privacy is taken into consideration in the development of these products. In addition, the PPU has taken the new obligations set out in section 4.2.26 of the [Directive on Privacy Practices](#) seriously, and has begun to develop processes for ensuring compliance with the new reporting requirements.

## APPENDIX A - DELEGATION ORDER

### ***Access to Information Act and Privacy Act Delegation Order***


The Minister of Public Safety and Emergency Preparedness, pursuant to section 73 of the *Access to Information Act* and of the *Privacy Act*, hereby designates the persons holding the position set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Minister as the head of a government institution, that is, the Royal Canadian Mounted Police, under the section of the Act set out in the Schedule opposite each position. This designation replaces and nullifies all such designations previously signed and dated by the Minister.

#### SCHEDULE

| <b>Position</b>                                                                                      | <b>Privacy Act and Regulations</b>                                                                                                                                                                                                                      | <b><i>Access to Information Act and Regulations</i></b>                                                                                                                  |
|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Commissioner of the RCMP<br/>Chief, Strategic Policy and<br/>Planning Officer</b>                 | Full Authority                                                                                                                                                                                                                                          | Full Authority                                                                                                                                                           |
| <b>Departmental Access to<br/>Information and Privacy<br/>Coordinator</b>                            |                                                                                                                                                                                                                                                         |                                                                                                                                                                          |
| <b>Commanding Officers</b>                                                                           |                                                                                                                                                                                                                                                         |                                                                                                                                                                          |
| <b>Officer in Charge, Policy,<br/>Processing and External<br/>Relations</b>                          | Authority for 8(2)(j) and 8(2)(m)                                                                                                                                                                                                                       | N.A.                                                                                                                                                                     |
| <b>Manager, Processing and<br/>Triage</b>                                                            |                                                                                                                                                                                                                                                         |                                                                                                                                                                          |
| <b>Manager, Quality Control</b>                                                                      |                                                                                                                                                                                                                                                         |                                                                                                                                                                          |
| <b>Non-Commissioned Officers<br/>and public servants in<br/>charge of ATIP unit</b>                  |                                                                                                                                                                                                                                                         |                                                                                                                                                                          |
| <b>Non-Commissioned Officers<br/>and public servants in<br/>charge of ATIP Branch<br/>(analysts)</b> | 14 and 15 for all records; 17(2)(b), 19 to 28 (inclusive) for all employee records as designated in InfoSource; For all other records requiring mandatory exemptions in their entirety (19(1), 22(2) and 26) of the Act; 9 and 11(2) of the Regulations | 7, 8(1) and 12(2)(b) and all records exempted in their entirety by mandatory exemptions (13(1), 16(3), 19(1), 20(1) and 24(1)) of the Act; 6(1) and 8 of the Regulations |

Signed, at the City of Ottawa, this 4 day of December, 2015

Signé, à Ottawa, ce \_\_\_ jour de \_\_\_\_\_, 20



\_\_\_\_\_  
The Honourable / L'honorable Ralph Goodale, P.C., M.P.  
Minister of Public Safety and Emergency Preparedness  
Ministre de la Sécurité publique et de la Protection civile

**APPENDIX B - Statistical Report on the *Privacy Act***

**Statistical Report on the *Privacy Act***

**Name of institution:** Royal Canadian Mounted Police

**Reporting period:** 2022-04-01 to 2023-03-31

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

**1.1 Number of requests received**

|                                                   |      | <b>Number of Requests</b> |
|---------------------------------------------------|------|---------------------------|
| Received during reporting period                  |      | 4741                      |
| Outstanding from previous reporting periods       |      | 3459                      |
| • Outstanding from previous reporting period      | 2197 |                           |
| • Outstanding from more than one reporting period | 1262 |                           |
| <b>Total</b>                                      |      | <b>8200</b>               |
| Closed during reporting period                    |      | 3212                      |
| Carried over to next reporting period             |      | 4988                      |
| • Carried over within legislated timeline         | 844  |                           |
| • Carried over beyond legislated timeline         | 4144 |                           |

## 1.2 Channels of requests

| Source       | Number of Requests |
|--------------|--------------------|
| Online       | 3247               |
| E-mail       | 1001               |
| Mail         | 488                |
| In person    | 0                  |
| Phone        | 0                  |
| Fax          | 5                  |
| <b>Total</b> | <b>4741</b>        |

## Section 2: Informal requests

### 2.1 Number of informal requests

|                                                   |   | Number of Requests |
|---------------------------------------------------|---|--------------------|
| Received during reporting period                  |   | 15                 |
| Outstanding from previous reporting periods       |   | 1                  |
| • Outstanding from previous reporting period      | 1 |                    |
| • Outstanding from more than one reporting period | 0 |                    |
| <b>Total</b>                                      |   | <b>16</b>          |
| Closed during reporting period                    |   | 6                  |
| Carried over to next reporting period             |   | 10                 |

### 2.2 Channels of informal requests

| Source       | Number of Requests |
|--------------|--------------------|
| Online       | 1                  |
| E-mail       | 14                 |
| Mail         | 0                  |
| In person    | 0                  |
| Phone        | 0                  |
| Fax          | 0                  |
| <b>Total</b> | <b>15</b>          |

**2.3 Completion time of informal requests**

| Completion Time |               |               |                |                 |                 |                    |       |
|-----------------|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------|
| 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 | Total |
| 2               | 0             | 2             | 2              | 0               | 0               | 0                  | 6     |

| Pages released informally<br>Less Than 100 Pages Released |                | 100-500 Pages Released |                | 501-1000 Pages Released |                | 1001-5000 Pages Released |                | More Than 5000 Pages Released |                |
|-----------------------------------------------------------|----------------|------------------------|----------------|-------------------------|----------------|--------------------------|----------------|-------------------------------|----------------|
| Number of Requests                                        | Pages Released | Number of Requests     | Pages Released | Number of Requests      | Pages Released | Number of Requests       | Pages Released | Number of Requests            | Pages Released |
| 6                                                         | 111            | 0                      | 0              | 0                       | 0              | 0                        | 0              | 0                             | 0              |

### Section 3: Requests Closed During the Reporting Period

#### 3.1 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                | 8               | 27            | 60            | 28             | 18              | 27              | 57                 | 225         |
| Disclosed in part            | 69              | 172           | 498           | 195            | 100             | 187             | 387                | 1608        |
| All exempted                 | 24              | 44            | 54            | 17             | 9               | 13              | 17                 | 178         |
| All excluded                 | 0               | 0             | 0             | 0              | 0               | 0               | 0                  | 0           |
| No records exist             | 20              | 22            | 32            | 32             | 42              | 54              | 106                | 308         |
| Request abandoned            | 652             | 38            | 32            | 27             | 16              | 15              | 90                 | 870         |
| Neither confirmed nor denied | 2               | 1             | 2             | 3              | 5               | 2               | 8                  | 23          |
| <b>Total</b>                 | <b>775</b>      | <b>304</b>    | <b>678</b>    | <b>302</b>     | <b>190</b>      | <b>298</b>      | <b>665</b>         | <b>3212</b> |

#### 3.2 Exemptions

| Section  | Number of Requests | Section       | Number of Requests | Section | Number of Requests |
|----------|--------------------|---------------|--------------------|---------|--------------------|
| 18(2)    | 0                  | 22(1)(a)(i)   | 526                | 23(a)   | 0                  |
| 19(1)(a) | 7                  | 22(1)(a)(ii)  | 269                | 23(b)   | 0                  |
| 19(1)(b) | 3                  | 22(1)(a)(iii) | 0                  | 24(a)   | 0                  |
| 19(1)(c) | 197                | 22(1)(b)      | 331                | 24(b)   | 0                  |
| 19(1)(d) | 51                 | 22(1)(c)      | 8                  | 25      | 0                  |
| 19(1)(e) | 1                  | 22(2)         | 0                  | 26      | 1254               |
| 19(1)(f) | 0                  | 22.1          | 0                  | 27      | 48                 |
| 20       | 0                  | 22.2          | 0                  | 27.1    | 0                  |
| 21       | 1                  | 22.3          | 0                  | 28      | 4                  |
|          |                    | 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 |       |
| 203   | 1627       | 0        | 19    | 62    | 0     |

### 3.5 Complexity

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

| Number of Pages Processed | Number of Pages Disclosed | Number of Requests |
|---------------------------|---------------------------|--------------------|
| 284890                    | 123957                    | 2904               |

**3.5.2 Relevant pages processed by request disposition for paper and e-record 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                | 214                           | 2230            | 9                       | 2351            | 1                        | 784             | 1                         | 1297            | 0                              | 0               |
| Disclosed in part            | 1264                          | 29069           | 249                     | 60470           | 37                       | 26212           | 53                        | 97885           | 5                              | 52353           |
| All exempted                 | 150                           | 3455            | 26                      | 4914            | 1                        | 575             | 1                         | 1019            | 0                              | 0               |
| All excluded                 | 0                             | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| Request abandoned            | 862                           | 638             | 7                       | 1131            | 1                        | 507             | 0                         | 0               | 0                              | 0               |
| Neither confirmed nor denied | 23                            | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| <b>Total</b>                 | 2513                          | 35392           | 291                     | 68866           | 40                       | 28078           | 55                        | 100201          | 5                              | 52353           |

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

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 43443                       | 830                         | 202                |



**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                | 5                              | 120               | 0                        | 0                 | 0                               | 0                 |
| Disclosed in part            | 189                            | 42685             | 5                        | 352               | 0                               | 0                 |
| All exempted                 | 3                              | 286               | 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>                 | 197                            | 43091             | 5                        | 352               | 0                               | 0                 |

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

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 15767                       | 621                         | 91                 |

**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                | 1                              | 9                 | 1                        | 61                | 0                               | 0                 |
| Disclosed in part            | 57                             | 1512              | 10                       | 853               | 20                              | 13238             |
| All exempted                 | 1                              | 1                 | 1                        | 93                | 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>                 | 59                             | 1522              | 12                       | 1007              | 20                              | 13238             |

**3.5.7 Other complexities**

| <b>Disposition</b>           | <b>Consultation Required</b> | <b>Legal Advice Sought</b> | <b>Interwoven Information</b> | <b>Other</b> | <b>Total</b> |
|------------------------------|------------------------------|----------------------------|-------------------------------|--------------|--------------|
| All disclosed                | 0                            | 0                          | 0                             | 87           | 87           |
| Disclosed in part            | 19                           | 0                          | 3                             | 812          | 834          |
| All exempted                 | 0                            | 0                          | 0                             | 32           | 32           |
| All excluded                 | 0                            | 0                          | 0                             | 0            | 0            |
| Request abandoned            | 0                            | 0                          | 0                             | 136          | 136          |
| Neither confirmed nor denied | 0                            | 0                          | 0                             | 14           | 14           |
| <b>Total</b>                 | 19                           | 0                          | 3                             | 1081         | 1103         |

**3.6 Closed requests**

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

|                                                                      |            |
|----------------------------------------------------------------------|------------|
| <b>Number of requests closed within legislated timelines</b>         | 1769       |
| <b>Percentage of requests closed within legislated timelines (%)</b> | 55.0747198 |

**3.7 Deemed refusals**

**3.7.1 Reasons for not meeting legislated timelines**

| <b>Number of requests closed past the legislated timelines</b> | <b>Principal Reason</b>                        |                              |                              |              |
|----------------------------------------------------------------|------------------------------------------------|------------------------------|------------------------------|--------------|
|                                                                | <b>Interference with operations / Workload</b> | <b>External Consultation</b> | <b>Internal Consultation</b> | <b>Other</b> |
| 1443                                                           | 1443                                           | 0                            | 0                            | 0            |

**3.7.2 Request 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 timeline where an extension was taken | Total |
|------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------------|-------|
| 1 to 15 days                             | 10                                                                       | 77                                                                       | 87    |
| 16 to 30 days                            | 10                                                                       | 65                                                                       | 75    |
| 31 to 60 days                            | 10                                                                       | 119                                                                      | 129   |
| 61 to 120 days                           | 9                                                                        | 178                                                                      | 187   |
| 121 to 180 days                          | 4                                                                        | 110                                                                      | 114   |
| 181 to 365 days                          | 10                                                                       | 256                                                                      | 266   |
| More than 365 days                       | 30                                                                       | 555                                                                      | 585   |
| <b>Total</b>                             | 83                                                                       | 1360                                                                     | 1443  |

**3.8 Requests for translation**

| Translation Requests | Accepted | Refused | Total |
|----------------------|----------|---------|-------|
| English to French    | 0        | 0       | 0     |
| French to English    | 0        | 0       | 0     |
| <b>Total</b>         | 0        | 0       | 0     |

**Section 4: Disclosures Under Subsections 8(2) and 8(5)**

| Paragraph 8(2)(e) | Paragraph 8(2)(m) | Subsection 8(5) | Total |
|-------------------|-------------------|-----------------|-------|
| 13                | 41                | 41              | 95    |

**Section 5: Requests for Correction of Personal Information and Notations**

| Disposition for Correction Requests Received | Number   |
|----------------------------------------------|----------|
| Notations attached                           | 3        |
| Requests for correction accepted             | 0        |
| <b>Total</b>                                 | <b>3</b> |

**Section 6: Extensions**

**6.1 Reasons for extensions**

| Number of extensions 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 ConfidenceSection (Section 70) | External | Internal |                                          |
| 2527                       | 0                                               | 0                     | 2527                     | 0                                 | 0                                      | 0        | 0        | 0                                        |

**6.2 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 ConfidenceSection (Section 70) | External | Internal |                                          |
| 1 to 15 days         | 0                                               | 0                     | 0                        | 0                                 | 0                                      | 0        | 0        | 0                                        |
| 16 to 30 days        | 0                                               | 0                     | 2527                     | 0                                 | 0                                      | 0        | 0        | 0                                        |
| 31 days or greater   |                                                 |                       |                          |                                   |                                        |          |          | 0                                        |
| <b>Total</b>         | <b>0</b>                                        | <b>0</b>              | <b>2527</b>              | <b>0</b>                          | <b>0</b>                               | <b>0</b> | <b>0</b> | <b>0</b>                                 |

## Section 7: Consultations Received From Other Institutions and Organizations

### 7.1 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           | 42                                      | 6550                      | 19                  | 1209                      |
| Outstanding from the previous reporting period | 5                                       | 580                       | 5                   | 222                       |
| <b>Total</b>                                   | 47                                      | 7130                      | 24                  | 1431                      |
| Closed during the reporting period             | 42                                      | 5169                      | 20                  | 1065                      |
| Carried over within negotiated timelines       | 3                                       | 475                       | 2                   | 47                        |
| Carried over beyond negotiated timelines       | 2                                       | 1486                      | 2                   | 319                       |

### 7.2 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 |       |
| Disclose entirely         | 10                                                        | 9             | 5             | 4              | 1               | 0               | 0                  | 29    |
| Disclose in part          | 1                                                         | 4             | 2             | 1              | 0               | 1               | 1                  | 10    |
| Exempt entirely           | 2                                                         | 0             | 1             | 0              | 0               | 0               | 0                  | 3     |
| Exclude entirely          | 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     |
| <b>Total</b>              | 13                                                        | 13            | 8             | 5              | 1               | 1               | 1                  | 42    |

### 7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

| 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 |           |
| Disclose entirely         | 6                                                         | 3             | 3             | 1              | 0               | 0               | 0                  | 13        |
| Disclose in part          | 1                                                         | 1             | 1             | 1              | 0               | 1               | 0                  | 5         |
| Exempt entirely           | 0                                                         | 1             | 0             | 1              | 0               | 0               | 0                  | 2         |
| Exclude entirely          | 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         |
| <b>Total</b>              | <b>7</b>                                                  | <b>5</b>      | <b>4</b>      | <b>3</b>       | <b>0</b>        | <b>1</b>        | <b>0</b>           | <b>20</b> |

## Section 8: Completion Time of Consultations on Cabinet Confidences

### 8.1 Requests with Legal Services

| Number of Days | Fewer 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 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               |
| <b>Total</b>   | <b>0</b>                       | <b>0</b>        | <b>0</b>                | <b>0</b>        | <b>0</b>                 | <b>0</b>        | <b>0</b>                  | <b>0</b>        | <b>0</b>                       | <b>0</b>        |

**8.2 Requests with Privy Council Office**

| Number of Days | Fewer 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 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               |
| <b>Total</b>   | 0                              | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |

**Section 9: Complaints and Investigations Notices Received**

| Section 31 | Section 33 | Section 35 | Court action | Total |
|------------|------------|------------|--------------|-------|
| 224        | 42         | 129        | 4            | 399   |

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

**10.1 Privacy Impact Assessments**

|                          |   |
|--------------------------|---|
| Number of PIAs completed | 3 |
| Number of PIAs modified  | 0 |

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

| Personal Information Banks | Active    | Created  | Terminated | Modified |
|----------------------------|-----------|----------|------------|----------|
| Institution-specific       | 38        | 0        | 0          | 0        |
| Central                    | 0         | 0        | 0          | 0        |
| <b>Total</b>               | <b>38</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 | 8 |
| Number of material privacy breaches reported to OPC | 8 |

**11.2 Non-Material Privacy Breaches**

|                                         |    |
|-----------------------------------------|----|
| Number of non-material privacy breaches | 81 |
|-----------------------------------------|----|

**Section 12: Resources Related to the *Privacy Act***

**12.1 Allocated Costs**

| Expenditures                      |             | Amount             |
|-----------------------------------|-------------|--------------------|
| Salaries                          |             | \$2,580,597        |
| Overtime                          |             | \$76,255           |
| Goods and Services                |             | \$1,376,065        |
| • Professional services contracts | \$1,085,754 |                    |
| • Other                           | \$290,311   |                    |
| <b>Total</b>                      |             | <b>\$4,032,917</b> |

**12.2 Human Resources**

| Resources                        | Person Years Dedicated to Privacy Activities |
|----------------------------------|----------------------------------------------|
| Full-time employees              | 31.668                                       |
| Part-time and casual employees   | 0.336                                        |
| Regional staff                   | 0.000                                        |
| Consultants and agency personnel | 3.834                                        |
| Students                         | 0.070                                        |
| <b>Total</b>                     | <b>35.908</b>                                |

**Note:** Enter values to three decimal places.

**APPENDIX C - Supplemental Statistical Report on the *Access to Information Act* and the *Privacy Act***

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

Name of institution: Royal Canadian Mounted Police

Reporting period: 2022-04-01 to 2023-03-31

**Section 1: Capacity to Receive Requests under the *Access to Information Act* and the *Privacy Act***

Enter the number of weeks your institution was able to receive ATIP requests through the different channels.

|                                                              | Number of Weeks |
|--------------------------------------------------------------|-----------------|
| Able to receive requests by mail                             | 52              |
| Able to receive requests by email                            | 52              |
| Able to receive requests through the digital request service | 52              |

**Section 2: Capacity to Process Records under the *Access to Information Act* and the *Privacy Act***

2.1 Enter the number of weeks your institution was able to process paper records in different levels.

|                                     | No Capacity | Partial Capacity | Full Capacity | Total |
|-------------------------------------|-------------|------------------|---------------|-------|
| Unclassified Paper Records          | 0           | 0                | 52            | 52    |
| Protected B Paper Records           | 0           | 0                | 52            | 52    |
| Secret and Top Secret Paper Records | 0           | 43               | 9             | 52    |

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

|                                          | No Capacity | Partial Capacity | Full Capacity | Total |
|------------------------------------------|-------------|------------------|---------------|-------|
| Unclassified Electronic Records          | 0           | 0                | 52            | 52    |
| Protected B Electronic Records           | 0           | 0                | 52            | 52    |
| Secret and Top Secret Electronic Records | 0           | 43               | 9             | 52    |

**Section 3: Open Requests and Complaints Under the *Access to Information Act***

3.1 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, 2023 | Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2023 | Total       |
|-----------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------|-------------|
| Received in 2022-2023                   | 714                                                                            | 2011                                                                           | 2725        |
| Received in 2021-2022                   | 0                                                                              | 1563                                                                           | 1563        |
| Received in 2020-2021                   | 0                                                                              | 1064                                                                           | 1064        |
| Received in 2019-2020                   | 0                                                                              | 331                                                                            | 331         |
| Received in 2018-2019                   | 0                                                                              | 212                                                                            | 212         |
| Received in 2017-2018                   | 0                                                                              | 119                                                                            | 119         |
| Received in 2016-2017                   | 0                                                                              | 31                                                                             | 31          |
| Received in 2015-2016                   | 0                                                                              | 2                                                                              | 2           |
| Received in 2014-2015                   | 0                                                                              | 1                                                                              | 1           |
| Received in 2013-2014 or earlier        | 0                                                                              | 0                                                                              | 0           |
| <b>Total</b>                            | <b>714</b>                                                                     | <b>5334</b>                                                                    | <b>6048</b> |

**3.2 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 2022-2023                                           | 189                              |
| Received in 2021-2022                                           | 74                               |
| Received in 2020-2021                                           | 6                                |
| Received in 2019-2020                                           | 18                               |
| Received in 2018-2019                                           | 2                                |
| Received in 2017-2018                                           | 0                                |
| Received in 2016-2017                                           | 0                                |
| Received in 2015-2016                                           | 0                                |
| Received in 2014-2015                                           | 1                                |
| Received in 2013-2014 or earlier                                | 0                                |
| <b>Total</b>                                                    | <b>290</b>                       |

**Section 4: Open Requests and Complaints Under the *Privacy Act***

4.1 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, 2023</b> | <b>Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2023</b> | <b>Total</b> |
|------------------------------------------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|--------------|
| Received in 2022-2023                          | 843                                                                                   | 2073                                                                                  | <b>2916</b>  |
| Received in 2021-2022                          | 1                                                                                     | 1279                                                                                  | <b>1280</b>  |
| Received in 2020-2021                          | 0                                                                                     | 535                                                                                   | <b>535</b>   |
| Received in 2019-2020                          | 0                                                                                     | 169                                                                                   | <b>169</b>   |
| Received in 2018-2019                          | 0                                                                                     | 71                                                                                    | <b>71</b>    |
| Received in 2017-2018                          | 0                                                                                     | 3                                                                                     | <b>3</b>     |
| Received in 2016-2017                          | 0                                                                                     | 6                                                                                     | <b>6</b>     |
| Received in 2015-2016                          | 0                                                                                     | 7                                                                                     | <b>7</b>     |
| Received in 2014-2015                          | 0                                                                                     | 1                                                                                     | <b>1</b>     |
| Received in 2013-2014 or earlier               | 0                                                                                     | 0                                                                                     | <b>0</b>     |
| <b>Total</b>                                   | <b>844</b>                                                                            | <b>4144</b>                                                                           | <b>4988</b>  |

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

| Fiscal Year Open Complaints Were Received by Institution | Number of Open Complaints |
|----------------------------------------------------------|---------------------------|
| Received in 2022-2023                                    | 52                        |
| Received in 2021-2022                                    | 23                        |
| Received in 2020-2021                                    | 9                         |
| Received in 2019-2020                                    | 5                         |
| Received in 2018-2019                                    | 3                         |
| Received in 2017-2018                                    | 0                         |
| Received in 2016-2017                                    | 4                         |
| Received in 2015-2016                                    | 0                         |
| Received in 2014-2015                                    | 0                         |
| Received in 2013-2014 or earlier                         | 0                         |
| <b>Total</b>                                             | <b>96</b>                 |

**Section 5: Social Insurance Number**

|                                                                                              |    |
|----------------------------------------------------------------------------------------------|----|
| Has your institution begun a new collection or a new consistent use of the SIN in 2022-2023? | No |
|----------------------------------------------------------------------------------------------|----|

**Section 6: Universal Access under the *Privacy Act***

|                                                                                                  |    |
|--------------------------------------------------------------------------------------------------|----|
| How many requests were received from confirmed foreign nationals outside of Canada in 2022-2023? | 42 |
|--------------------------------------------------------------------------------------------------|----|