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1984/85
Communications Canada
Access to Info

Gouvernement du Canada
Ministère des Communications



ACCESS TO INFORMATION AND PRIVACY

ANNUAL REPORT 1984-1985

Canada

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1984/85

REPORT ON ACCESS TO INFORMATION
1984-1985

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A) Statistics



REPORT ON ACCESS TO INFORMATION

Institution Department of Communications	Reporting period April 1, '84 - March 31, '85
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I Requests under the Access to Information Act

Received during reporting period	47
Outstanding from previous period	3
TOTAL	50
Completed during reporting period	47
Carried forward	3

II Disposition of requests completed

1. All disclosed	32	6. Unable to process	0
2. Disclosed in part	7	7. Insufficient information	0
3. Excluded	0	8. Abandoned	6
4. Exempt	2	9. Does not exist	0
5. Transferred	2	TOTAL	49

III Exemptions invoked

S. 13(1) (a)	1	S. 16(1) (d)		S. 20(1) (c)	1
(b)		S. 16(2)	1	(d)	1
(c)		S. 16(3)		S. 21(1) (a)	2
(d)		S. 17	1	(b)	2
S. 14	1	S. 18 (a)		(c)	
S. 15(1) Internat. rel.	1	(b)		(d)	1
Defence	1	(c)		S. 22	
Subversive activities	1	(d)		S. 23	1
S. 16(1) (a)		S. 19(1)	6	S. 24	1
(b)		S. 20(1) (a)	2	S. 25	2
(c)		(b)	3	S. 26	

IV Exclusions cited

S. 68 (a)	
(b)	
(c)	
(d)	
S. 69(1)	
S. 69(1) (a)	
(b)	
(c)	
(d)	
(e)	
(f)	
(g)	

V Completion time

Under 30 days	39
31 to 60 days	4
60 to 120 days	4
Over 120 days	

VI Extensions

	Under 30 days	Over 30 days
Searching	3	3
Consultation	1	1*
Third party	0	1
TOTAL	4	5

VII Translations

Translation requested	0
Translation prepared	0
English to French	
French to English	
Average time to prepare translations	

VIII Method of access

Copies given	38
Examination	0
Copies and Examination	3

IX Fees

Fees collected	
Application fees	225.-
Reproduction	739.62
Searching	--
Preparation	456.-
Computer processing	1,799.17
TOTAL	3,219.79
Fees waived over \$25.00	\$64.25
Fees waived (no. of times)	1

X Costs

Personnel	
Officer	\$43,490
Support staff	\$34,233
Other	\$42,972
TOTAL	\$120,695
Officer (PY)	1,019
Support staff (PY)	1,289
TOTAL	2,308

XI Appeals to info. commissioner

Reasons	
Non disclosure	1
Fees	1
Extension	1
Publications	
Denial of translation	
Time to prepare trans.	
Other	
No. initiated during reporting period	3
No. completed during reporting period	2
No. carried forward	2
Average time of resol. (for those compl.) (days)	
Commissioner's recommendation accepted	
Commissioner's recommendation rejected	

XII Appeals to Federal Court

Appeal by	
Applicant	
Third party	
Information commissioner	
Average time of resol. (for those compl.) (days)	
No. initiated during reporting period	
No. completed during reporting period	
No. carried forward	
Disclosure ordered	
Non-disclosure ordered	
Other	

TAC 350-62 (83/2)

* This extension was also for Third Party requests au verso

B) INTERPRETATION

Costs of the ATIP Secretariat

The ATIP Secretariat has been established to handle both access and privacy requests. Although the vast majority of requests during the reporting period were for access, as in the previous year, 25% of the Secretariat costs have been applied to Implementation of the Privacy Act. Total costs of \$120,695 were calculated as follows:

Personnel Costs

Coordinator of Secretariat (1 officer)	75% of 1py X salary
Administrative Assistant (1 support position)	75% of 1py X salary
Computer Systems Assistant (1 support position 4/84 - 9/84)	75% of .416py X salary
Other personnel, calculated individually	time as % of py X salary

Operational Costs

Materials cost for response to each enquiry	100% of total
Computer system costs, for records database and ATIP tracking system	75% of total
ATIP administrative costs such as training, publications, travel, etc.	75% of total

Prior to the coming into force of Bill C-43, Records Management and the ATIP Secretariat initiated the implementation of a fully automated records index, accessible by key word search. The Department maintains a decentralized record system, with minimal records staff, and it was decided that it would be very difficult to comply with the 30 day deadline required by the Act without automated search mechanisms. The Department has a contract with a service provider using the Basis system for this records database, and for the ATIP enquiry tracking system. The full costs for this system are shown under operational costs.

During the second year of implementation, much more emphasis was placed on fully accounting for the time and resources expended in carrying out ATIP responsibilities. Departmental personnel now report the time spent on each request, and report quarterly on the time spent on other activities such as policy formulation, management of personal information banks, advising outside agencies on the protection of third party information, attending ATIP meetings and briefings, and so on.

Administrative costs are tallied for each request, and a method has now been developed using the automated tracking system to distinguish between actual costs and amounts which can be charged to the client. In many cases, especially lengthy computer printouts which may require special programming and severance, there is a substantial difference between what we charge the client

and what the request actually costs the Department. For example, we are only allowed to charge \$16.50 per minute for computer time to produce a printout. The system which is used for our automated radio licensing system costs us \$6.00 per minute, plus \$1.50 per 1,000 accesses. A request may necessitate anywhere from a few thousand to 600,000 accesses, but the CPU time will remain relatively small even on complex searches.

When a document requires severance, it is usually necessary to make a copy, white out the protected areas, and make another copy. We have had requests for files involving hundreds of sensitive documents, so the costs of producing the first copy, for which we may not charge the client, can mount up appreciably. Departmental personnel are instructed to make notes on the tracking document which accompanies each request they receive, to account for all time spent, to report on number of pages photocopied, the cost of existing documents or microfiches supplied, and so on. The ATIP Secretariat determines which costs are chargeable to the client, and enters all information on the ATIP reporting system.

It is not the intent of this accounting system to spend extra time chasing every penny spent on ATIP activities, but rather to provide an accurate accounting system to fully justify those fees which are charged to the client. It is also useful to provide senior management with accurate information about the cost of providing information through ATIP mechanisms as opposed to other informal methods, and to assist in forecasting resource requirements.

As in the first year of ATIP implementation, no search fees were charged to the client, although there were several long and complicated requests which required searching beyond the first five hours. Once the cost reporting system is running smoothly, we will certainly begin charging for searching and preparation costs. The Department is receiving an increasing number of requests for large quantities of documents, national lists of radio licensees, requests for detailed background information about Departmental programs and policies, and other involved requests that are very similar to library research, except that they involve government documents and must therefore be treated under the Act. The time spent responding to these requests is becoming a real concern, and the only mechanism available to limit this type of request is to charge for the time spent searching for the information. The intention is not to become restrictive or punitive in assessing fees, but if present trends continue the Department will soon be operating a free research service. It was not the intention of the Act to replace the normal channels of information, such as departmental libraries.

Time Extensions

Four time extensions greater than 60 days were requested during the reporting period, for the purposes of searching and consultation. One request was a very general one, seeking

information on an entire class of documents. It took some time to contact the individual by telephone, in order to narrow the request, and it was then established that the information requested would require third party consultation. An earlier enquiry by the same individual also required a 60 day extension, because it was for a large quantity of information, some of which had already been requested informally. Some information was sent to the applicant free of charge, but the bulk of the request could only be satisfied by preparing a special computer printout, for which the individual did not wish to pay. The Department searched at no charge for existing documents which could satisfy the request, but any documents which could be located would have cost the applicant more than the printout. Searching for these documents and preparing cost estimates took a great deal of time.

One request which required a 60 day extension was for a large quantity of information provided by individuals through outside agencies and private organizations, with the expectation that the material would be kept in confidence. Negotiations with the applicant to limit the size of the request, and consultations with the outside agencies required additional time.

The fourth request requiring an extension of 60 days was for over 80 files, requiring a search of regional files as well as headquarters, and involving a great deal of sensitive information. The applicant complained about the time extension to the Information Commissioner, and the complaint was found to be unjustified.

Abandoned and Unprocessed Requests

There were six requests which were abandoned during the reporting period. One of these requests was for the same documents requested in the last case mentioned under Time Extensions. The Department spent a great deal of time preparing and severing the documents (at no charge), and shipped them all to Toronto so that the applicants could avoid paying the photocopying fees of \$400.00, but this applicant had no interest in viewing the files when they arrived.

Two requests were abandoned because no deposit was received by the ATIP Secretariat within 30 days of the mailing of a fee assessment and request for deposit. Another request was abandoned because the applicant failed to send the \$5.00 application fee when it was requested. Two other requests were too broad in topic for the Department to identify the relevant documents, so the applicants were sent file indexes for the appropriate areas and public information materials available from Information Services. They were asked to specify more precisely the information they wanted, but there was no further response.

Fee Waiver

The Department has a policy of no fee waivers other than the first \$25 of photocopying charges. In one instance this year, we provided free of charge a 357 page document because a surplus copy already existed.

Source of Requests

Although this information was not tracked throughout the year, it is possible at this point to provide reasonably accurate identification of the source for the requests completed during 1984/85. The percentage breakdown is as follows:

8.3 % media
6.3 % academia
33.3 % business
31.3 % other organizations
20.8 % public
0.0 % not identifiable as any of the above

Since applicants are never asked to identify their reasons for wanting the information, or to identify their organization, it is often difficult to state with certainty that an applicant belongs in the "public" category rather than the "not identifiable" category. Where there is no reason to think that the applicant is other than a member of the general public, either from the nature of the information requested or from dealings with the individual, the request is put in the "public" category.

C) SUPPORTING DOCUMENTATION

Organization of ATIP Activities

The Coordinator of Access to Information in the Department of Communications is the Director General of Personnel and Administration. He has established an independent secretariat to administer and coordinate all ATIP inquiries, consisting of one full time officer (the ATIP Secretariat Coordinator) and one full time support person. A Corporate Review Panel (CRP) has been established to review any potentially sensitive or exempt material. CRP members are senior managers whose function is to make recommendations on exempt material to the Minister or Deputy Minister as required. Members are:

Departmental ATIP Coordinator (Chairman of CRP)
Coordinator, ATIP Secretariat
Senior Assistant Deputy Minister and Sector Coordinator
for Policy Sector
Assistant Deputy Minister and Sector Coordinator
for Cultural Affairs Sector
Assistant Deputy Minister and Sector Coordinator
for Spectrum Management Sector

Assistant Deputy Minister and Sector Coordinator
for Technology and Industry Sector
Assistant Deputy Minister and Sector Coordinator
for Research Sector
Director, Resources Management for Personnel &
Administration
Director, Security & Communications Support
Services
Representative of Legal Services

The Corporate Review Panel meets as needed. When a decision on sensitive material is required, the Assistant Deputy Minister of the sector involved attends. Normal administration of ATIP inquiries and liaison with responsibility centres are achieved through the sector coordinators, of which there are seven.

The ATIP Secretariat has published an Access to Information and Privacy Manual, which explains the legislation to employees and outlines procedures to be followed in the handling of ATIP inquiries. During the course of the last two years, certain practices have evolved somewhat differently from what is described in the manual, and a new manual is proposed for 1985/86. In particular, we find that it is not possible to simply send the request out to the responsibility centre, and rely on them to interpret the request, find the appropriate exemptions which may apply, and return completed documents to the ATIP secretariat. When a request is received, it is routed through the sector coordinator to the responsibility centre, and at this point usually the ATIP Secretariat is contacted for advice in tracking down the documents and determining what the client wants. Although the manual stipulates that the ATIP Secretariat is to contact the client, usually the ATIP Secretariat Coordinator decides, in discussions with the sector coordinator and the responsibility centre manager, who would be the most appropriate person to contact the client. In most cases, this will be the responsibility centre manager, since they are the ones who are familiar with the subject matter. Despite the fact that manuals and briefing sessions have been made available to Departmental personnel, we have found that usually the responsibility centre manager requires quite a bit of coaching in preparing the request and suggesting exemptions.

In normal practice, there are four levels of exemption of sensitive material. In simple, routine requests, there are frequently elements which obviously require exemption: for example, an employee's home address, name, and telephone number on a travel authorization. This type of simple exemption is done by the ATIP Secretariat without consultation. If the material is more sensitive, but obviously qualifies for certain exemptions, it is customary for the ATIP Secretariat Coordinator to consult legal services for guidance in applying the exemptions, often with the sector coordinator participating. In the event that the material is more complex, involves other sectors of the Department, or touches issues which have not been dealt with in previous ATIP

enquiries, a meeting of the Corporate Review Panel is held to discuss the question. The most sensitive of these requests are reviewed by the Assistant Deputy Ministers, and a recommendation is made by the Departmental ATIP Coordinator to the Minister.

The ATIP Secretariat has established procedures for notifying applicants formally, in writing, of:

- 1) excluded records
- 2) methods of access available
- 3) time extensions
- 4) fee estimates
- 5) requests for deposit
- 6) exemptions claimed

All consultation with other institutions is coordinated through the ATIP Secretariat, usually in writing or confirmed by letter.

We found that the rate of enquiry at the end of this reporting period is over double what it was at the same time last year, and many of the requests are more complex. The ATIP Secretariat would welcome more opportunities to meet with other Coordinators in order to compare experiences and approaches. Lack of consistency in approach is a complaint which is heard frequently from applicants, and we find that individuals are taking the same request to a number of different departments and comparing the various responses. While it is recognized that no two institutions are the same in either their information holdings or their administrative practices, there should be greater consistency in the application of the ATIP legislation. It is difficult to imagine how this can be achieved without regular meetings or workshops for those concerned.

The Department uses the same database for its ATIP tracking system as four other departments, and the ATIP staff of these departments meet regularly to discuss changes to the database structure and difficulties in the reporting system. These meetings have proved very useful in comparing approaches to interpretations of legislation and policy. It would be much more useful, however, to have regular workshops of small groups of representatives from departments with similar information holdings, convened by either Treasury Board or the Department of Justice. In accordance with instructions issued in the ATIP implementation reports, the ATIP Secretariat has suggested a number of topics for possible workshops, such as:

Licensing Information: protection of personal and third-party information

Commercially Sensitive Information: identification and protection while under the control of the institution
Access to Staff Relations Information and Investigations
by authorities not listed in the Regulations
Cost Accounting

D) ATIP IMPLEMENTATION

In December 1982, the Department published its Access to Information and Privacy Manual. The ATIP Secretariat developed a training package, including a Telidon presentation outlining the legislation and procedures to follow in handling requests. Briefing sessions were held for all headquarters and Communications Research Centre personnel and for certain key staff in the regions. During 1984/85, briefings were held for staff in the regional offices at Vancouver, Montréal, and Moncton. Sessions are planned this year for Winnipeg and Toronto.

Regional Activities

Although staff in the regional and district offices are the Department's primary interface with the public, there has been very little interest in ATIP displayed by the public in the regions. Since all requests are forwarded to headquarters, there is little requirement for staff in the regions to be proficient in applying the exemptions of the Act, so the emphasis in regional briefings has been on the protection of personal information, and the rights of the public. Originally it had been planned that the regional offices would process their own requests within three years of the implementation of the legislation, but this is no longer being considered.

Reading Rooms

Reading areas have now been set up in each of the regional offices, where the public may examine documents and manuals. Since most of the regional offices do not have libraries per se, facilities depend on the space available. In one case, a table and chairs have been set up in the reception area, close to where the public information pamphlets are made available. An attendant is at hand who can fetch manuals from other areas, since it was not considered to be cost effective to purchase new sets of manuals for each reading area.

The automated records index can be accessed from a number of terminals in each regional office, and staff have been trained to do key word searches. When a client wishes to find references for the information he or she desires, the staff can search the database and assist the individual in locating the desired documents. Since all of the Department's filing systems are entered in the database now, with details of where the records are located and who is responsible for each file, it is a relatively simple matter for an employee to locate any information, whether or not they are familiar with the subject matter.

At headquarters, a separate ATIP room has been set up in the library, furnished with a Telidon terminal capable of showing ATIP briefing materials and of searching the records database. It is planned that the copies of material released in response to requests, which must be retained by the ATIP Secretariat, will be transferred to the library and made available to the public in this area. A list of subjects of requests will be entered on the database, accessible through key word search.

ATIP Tracking System

The ATIP tracking system which was implemented to record action taken on all requests was fully described in the first annual report. Certain modifications have been made to the reporting system to facilitate the automated preparation of the reports to Treasury Board, and the system is working well.

All personnel involved with an inquiry are required to report their actions to the ATIP Secretariat Coordinator, to be added to the inquiry record. Minutes of the Corporate Review Panel relevant to the inquiry are attached to the applicant's file.

Formal and Informal Inquiries

Cost reporting systems have been put in place which will show the cost to the Department of formal methods of information distribution. As described in the first Annual Report, informal mechanisms of information release continue to work well, and account for the vast majority of information requests handled by the Department. Staff are urged to refer the public to the ATIP Secretariat when they believe the information may be sensitive. The Secretariat in turn always tries to handle requests informally when there is obviously no concern about the protection of the information.

One area of growing concern is cost recovery. There exist very few mechanisms for charging individuals for documents, microfiches, or computer tapes provided by the Department. ATIP does provide a mechanism for charging fees, and in the case of expensive materials which would otherwise be distributed at no charge, it is quite likely that the formal route will continue to be used in order to place some form of control over the distribution of expensive materials.

D) INSTITUTIONAL POLICIES

Policies on the handling of requests, the activities of the Corporate Review Panel, and the assessment of fees have been discussed in earlier sections of this report. Other policies, including the handling of sensitive documents, were discussed in last year's annual report. One key target area for policy development in 1985/1986 is the handling, retention, and protection from disclosure of commercially sensitive information.

E) DELEGATION INSTRUMENT

The delegation of authority with respect to Access to Information became effective July 1, 1983, and was intended to retain decision making at the senior level. The Deputy Minister and Departmental Access to Information and Privacy Coordinator have been delegated responsibility for all sections of the Act. The Coordinator of the Access to Information Secretariat has responsibility for sections 7, 8(1), 9, 11(5), 28(1), 28(4), 28(5), 28(8), 29(1), 33, 43(1) and 44(2) of the Act, only when it has been determined that access shall be given.

The Access to Information Coordinator appointed for the Department of Communications is the Director General of Personnel and Administration. In addition to the various duties related to personnel and administration, he is responsible for all Access to Information and Privacy activities. He is briefed regularly on all inquiries, and convenes and chairs the Corporate Review Panel when required. He is responsible for all policy developed in the Department with regard to Access to Information and its implementation through the administrative divisions for which he is responsible. These include the ATIP Secretariat, the library, records management, personnel and staff relations.

The Departmental Coordinator has access to all records under the control of the Department. It is his responsibility to brief and advise the Minister and Deputy Minister. Routine supervision of the Coordinator of the ATIP Secretariat has been delegated to the Director of Resources Management, leaving the Coordinator free to make only those decisions required at his level. At the present level of inquiries, this chain of authority is functioning smoothly.

F) INVESTIGATIONS

The Department received notice of four appeals filed against it during the reporting period. In addition to this, there was one appeal outstanding from the previous reporting period. Two of these appeals were still outstanding at the end of this year, and serve as excellent examples of the complexity of the issues involved in access to information and the protection of personal and third party information. The other three appeals were resolved quite quickly.

In one case, an individual who had requested information informally from the Department sent an appeal to the Information Commissioner, even though he had not yet filed an official access request. He had asked why certain information was not disclosed to him, and whether he could get it by filing a formal request. A letter was sent explaining that the information would also be protected in the event of a formal enquiry, but he would have the right to complain to the Information Commissioner. He immediately complained. The case was dismissed since there was no formal enquiry.

One applicant complained about a time extension, the fees assessed, and the exemptions cited for one enquiry which involved a large number of documents. The applicant had asked for photocopies of the documents, and since this involved over 30 files, an estimate of \$400 was given. The documents were shipped to Toronto, where the applicant viewed them at no cost, and requested 115 photocopies. He was charged \$28.75 for these copies. The applicant withdrew his complaint about fees, but wished to pursue his complaint about delays.

The investigator from the Information Commissioner's office found that over 200 staff hours were spent on the review, involving eight persons. Documents were sought in all five regions, and over 80 files examined. The complaint was dismissed, two and a half months after it was received.

The third complaint was received in June 1984, and was not resolved during the reporting period. It involved the citing of exemptions to sever or exempt large numbers of the documents. Over sixty documents were exempted in their entirety, based on a number of exemptions including Sections 14, 15(1)(h),(j), 19, 20(1)(a), 20(1)(b), 21(1)(a), 21(1)(b) and 23.

It has taken over eight meetings with the investigator and three departmental personnel to review every document which was severed or exempted, in addition to many hours spent by departmental staff researching the documents to determine such things as whether the information had been released before, or whether it had been received in confidence from other organizations. The Department has agreed to release additional information contained in over 350 documents which were formerly severed or exempted entirely.

The other complaint involved the Department's exemption of certain radio licensing information which had been requested, and was briefly described in our 1983/1984 report. The fact that the complaint was still not satisfactorily resolved at the close of this reporting period is an indication of the complexity of some of the issues.

The Spectrum Management Sector of the Department of Communications is responsible for the licensing of over 1,180,000 radio stations in Canada. In order to do so, information is collected from licensees on the application for a radio licence, and the department then assigns frequencies and call signs to the licensee. This information is stored in a variety of forms in the Department, at headquarters and both regional and district offices. Most of the information is stored on a 650 megabyte database known as the assignment and licensing system. The information is in constant use, as new frequency assignments are made, interference complaints investigated, or applications from licensees to change power or equipment are evaluated. Microfiches of certain fields of information are produced routinely for use in the Department, and these have been made available to the public for a number of years.

It has been a policy not to release names of licensees, except where necessary for such activities as frequency coordination. When the Privacy Act was enacted, this policy was continued since it was considered that the name, address, and call sign (an identifying number assigned to the licensee for certain classes of license) are personal information.

The complaint was based on the absence of this information on the microfiches, and on the absence of certain frequencies which are not entered on the microfiches because there may be frequencies in them which are allocated for classified use. The latter were protected by Sections 15 and 16 of the Act, and the Information Commissioner supported the citing of these exemptions in her findings.

However, as explained on page 26 of the Privacy Report, the Information Commissioner did not support the citing of Section 19 of the Access to Information Act to exempt the name of the individual licensee. It is her view that because this information pertains to the granting of a license, it is not personal information within the definition given in Section 3 of the Privacy Act (Section 3(1)). It is the view of this department that Section 3(1) refers to the granting of a discretionary benefit of a financial nature, and that few of the licences granted by this department confer a direct financial benefit. Very few of those that do are granted to individuals. However, it is the view of the Department that the radio spectrum is a finite resource and that the Canadian public has a right to know who is using that resource. The decision was taken to release the names, call signs, and assigned frequencies of licensees, under Section 8(2)(m) of the Privacy Act.

Release of this information now enables an individual to link the name of the licensee with a great deal of technical information about the radio station, information which has always been available on microfiche. Technical information would include the transmitter sites, number of mobile units, power and bandwidth of emission, type of equipment authorized, company code, and so on. Some of this information may be eligible for protection under a number of sections of the Access to Information Act, including 13, 15, 16, and 20, but the Department is not always in possession of enough data to make this decision. The cost of consulting each licensee would of course be enormous.

This issue has been described in some detail, because it is a good illustration of the conflicting principles which affect the implementation of the Access to Information and Privacy legislation. After considerable debate on this issue, we have discovered that there are no easy answers. We have, however, identified a number of questions which warrant further examination:

1) Licensing Information

What is the correct interpretation of Section 3(1) of the Privacy Act? Must there be a financial benefit of a discretionary nature for this section

to apply? Does an individual, or a company, by applying for a licence required by the Federal Government, relinquish any rights of confidentiality or privacy over the information submitted?

2) Lists of Information

While there is no difference in principle between disclosure of the files related to one or two individuals and those of 500,000 individuals, in practice there is a big difference. The Treasury Board's Interim Policy Guide discourages the issuing of mailing lists and marketing lists, but if the name of a licensee is not personal information, lists of names with or without addresses could be used for this purpose. Frequency lists with names of licensees are already being assembled by private individuals and sold in radio shops. Provision of printouts by the Department certainly facilitates the widespread distribution of this information, without the consent of the individual. Is this an invasion of privacy?

Costs of distributing information to the public

3)

Widespread use of microcomputers and devices such as optical character readers have made it much easier for small companies or even individuals to handle large quantities of information. The appetite of the public for this information is therefore growing. Nonetheless it is very expensive for a department to locate this information, prepare it in the form desired by the client, and especially to check it to determine whether portions of it should be protected by severance. Only portions of these costs are recoverable, and in any case money recovered does not return to the responsibility centre which expended it. It is the experience of this institution that these costs are becoming onerous.

At the same time as Access to Information costs mount up, publication budgets are being cut. A public information program might easily be more cost effective than providing large quantities of information through ATIP, but where will the money be found for this activity, particularly in programs which operate on a cost recovery basis, such as radio licensing? Should a department respond to the curiosity of a relatively small number of individuals by providing public


information materials? What priority does an institution put on disseminating information to the public which they do not have a clear need to know?

What priority does an institution place on protecting information provided by the client, where there has been little or no interest expressed by the clients in the disclosure of the information?

In a vacuum, the debate over these questions could continue for some time, but as each new access request arrives, it forces the Department to pull different aspects of the issue into sharp focus in order to reach a decision. It is hoped that 1985/1986 will see the resolutions to some of these problems.

1983-84 Statistics

APPENDIX A

 Government of Canada / Gouvernement du Canada

REPORT ON ACCESS TO INFORMATION

Institution DEPARTMENT OF COMMUNICATIONS	Reporting period JULY 1, 1983 - MARCH 31, 1984
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I Requests under the Access to Information Act		II Disposition of requests completed			
Received during reporting period	30	1. All disclosed	6	6. Unable to process	0
Outstanding from previous period	0	2. Disclosed in part	9	7. Insufficient information	1
TOTAL	30	3. Excluded	0	8. Abandoned	4
Completed during reporting period	27	4. Exempt	2	9. Does not exist	5
Carried forward	3	5. Transferred	0	TOTAL	27

III Exemptions invoked					
S. 13(1) (a)	1	S. 16(1) (d)		S. 20(1) (c)	2
(b)	1	S. 16(2)	1	(d)	2
(c)	2	S. 16(3)		S. 21(1) (a)	4
(d)		S. 17		(b)	2
S. 14		S. 18 (a)		(c)	2
S. 15(1) Internat. rel.	*	(b)		(d)	1
Defence	*	(c)		S. 22	
Subversive activities	*	(d)		S. 23	2
S. 16(1) (a)		S. 19(1)	3	S. 24	
(b)		S. 20(1) (a)	1	S. 25	7
(c)	1	(b)	5	S. 26	2

IV Exclusions cited	
S. 68 (a)	
(b)	
(c)	
(d)	
S. 69(1)	3
S. 69(1) (a)	
(b)	2
(c)	
(d)	
(e)	
(f)	
(g)	

V Completion time	
Under 30 days	16
31 to 60 days	6
60 to 120 days	2
Over 120 days	3

VI Extensions		
	Under 30 days	Over 30 days
Searching	1	**
Consultation	2	**
Third party		1**
TOTAL	3	3**

VII Translations	
Translation requested	0
Translation prepared	0
English to French	
French to English	
Average time to prepare translations	

VIII Method of access	
Copies given	12
Examination	1
Copies and Examination	2

IX Fees	
Fees collected	
Application fees	125.00
Reproduction	316.50
Searching	--
Preparation	25.00
Computer processing	718.61
TOTAL	1,185.11
Fees waived over \$25.00	\$ --
Fees waived (no. of times)	0

X Costs	
Personnel	
Officer	\$ 58,450
Support staff	\$ 45,450
Other	\$ 8,300
TOTAL	\$ 112,200
Officer (PY)	1,350
Support staff (PY)	1,600
TOTAL	2,950

XI Appeals to Info. commissioner	
Reasons	
Non disclosure	1
Fees	
Extension	
Publications	
Denial of translation	
Time to prepare trans.	
Other	
No. initiated during reporting period	1
No. completed during reporting period	0
No. carried forward	1
Average time of resol. (for those comol.) (days)	
Commissioner's recommendation accepted	
Commissioner's recommendation rejected	

XII Appeals to Federal Court	
Appeal by	
Applicant	
Third party	
Information commissioner	
Average time of resol. (for those comol.) (days)	
No. initiated during reporting period	0
No. completed during reporting period	
No. carried forward	0
Disclosure ordered	
Non-disclosure ordered	
Other	

TBC 350-62 (83/2)

** See attached note.

Français au verso

** Two inquiries had identical extensions of 60 days for all three purposes.

APPENDIX B

TOPICS OF ACCESS INQUIRIES AND DEPARTMENTAL RESPONSE, 1984/1985

Entries are in language of applicant's original request.

1. Deadline date given in a memo from the Correction Service Canada telephone service officer to Policy, Planning and Administration Branch; Evaluation and Special Projects Dept. regarding changes to the Government Telephone directory, June 1983 issue, and the date this info was rec'd by GTA/DOC.

Disclosed in part, transferred.

2. (2 requests)
Report of the DOC Task force on the distribution, marketing and exhibition of films in Canada. Task force chairman, Mr. Ron Cohen, a consultant. Final report presented to Hon. F. Fox in 1982. Report is a summary of detailed consultations with all sectors of the Canadian and U.S. film industry and is complete with a recommendation section and a number of appendices.

All disclosed

3. Liste des usagers autorisés à utiliser le service téléphonique mobile routier de Bell Canada dans les villes de Montréal, Québec, Ottawa, Hull.

Exempt, 20(1)(1), 20(1)(b), 20(1)(c), 20(1)(d)

4. Job description and point rating for position currently held by ...

Disclosed in part, 19(1)

5. The departmental EDP Plan also known as the Information Technology and Systems Plan for the current fiscal year and the past year.

All disclosed

6. An extract on computer magnetic tape of certain info pertaining to licence fees for Imperial Oil Ltd. licences under the following company codes...

All disclosed

7. File 6205-7, copy of a complaint letter concerning "channel hogging" and use of a citizens band radio by a supervised minor. Copy of governmental regulations concerning use and operation of a CB/SSB radio by a licenced GRS operator.

Disclosed in part, 19(1)

8. File pertaining to the radio licence under Northwest Telecom that was authorized to erect a communications tower at a height of 768 ASL, near an unlicensed aerodrome in Fort Franklin, N/W Territories. Specifically, documentation pertaining to the clearance obtained from Transport Canada including technical info about the location of the tower, its position in relation to the runway, color markings etc. Documentation pertaining to the date of construction and plans and specifications, compliance with safety specifications, inspections verifying compliance with construction and safety specifications. Documentation pertaining to completion of construction and date use of the tower was commenced.

All disclosed

9. All information regarding frequencies and licencees in metropolitan Toronto, Ontario for the following ranges 30-50 mhz, 108-144 mhz, 148-174 mhz, 350-512 mhz, and specifically name of licencees, assigned frequencies, purpose of frequency and location of licensee.

Disclosed in part

10. International Committee on Space Research DOC-PL-20, spacecraft power systems and batteries DOC-RE-310, Space Shuttle/Waves in Space Plasmas Project DOC-RE-380 and Microwave propagation studies and experiments. Reports on high data rate fibre optics communications DOC-RE-400

Abandoned

11. The Operational Plan of the Government Telecommunications Agency for the current year and the past year.

All disclosed

12. Name and address and assigned radio frequencies of companies assigned radio frequencies and operating base stations associated with base to mobile operations in Ontario.

All disclosed

13. (12 requests)
CRC VHF/UHF Radio Propagation Computer Prediction Program and Topographic data, Base - 2 magnetic tapes held by DOC/RCT/DRL

All disclosed

14. Ship radio station licence, name of vessel information in alphabetical order (B.C. only if possible). List up-to-date to end of Jan/85

All disclosed

15. Microfiches, assignation de fréquences, rapport 3, mhz ordre de fréquence par région, rapport 20, ordre d'indicatif d'appel.

Disclosed in part, 19(1)

16. Latest Amateur Radio mailing list for the entire country.

All disclosed

17. Access to documentation related to the cellular mobile telephone licensing activity. The document would have been prepared during the period prior to the department issuing a call for applications on Oct. 23, 1982 up to and in the aftermath of the licence award to CANTEL on December 14, 1983.

All disclosed

18. All records concerning the CANCOM service and all records relating to the policy, the regulatory issues concerning, and business or financial issues relating to the CANCOM carriage of both Canadian and American television and radio services. All records concerning the carriage of distant signals by satellite or by microwave. This would include records pertaining to the policy, financial, and cultural aspects of the carriage of distant broadcast signals by satellite for eventual distribution by cable or by low power transmitters.

19. DOC P20 Spectrum Management System (SMS) DATA BASE. Would like to perform search on file for a printout listing of all most recently radio frequencies, call signs, names of licensees, and class of station. Search the file by geographical location. Would like to know the costing for a printout, either for the whole province of Quebec or just the geographical locations around and including Montreal. Information to be used for personal reference only. Not interested in the addresses of licensees or the licence for accounting information.

All disclosed

20. Report on future role of CRC Shirley Bay by Price Waterhouse, Philip A. Lapp Ltd., and another completed March-June 84 time frame.

All disclosed

21. Military Communications Research and Development and Radio Communications.

All disclosed

22. 1) A list of all TV stations in Canada that are not of the "unprotected" type with the following information given for each: call sign, channel, offset, latitude and longitude of the transmitter site, average visual ERP, average aural ERP, and EHAAT, and also city or town of licence. Arranged by channel or city, whichever is cheaper to do. This is to be current information. 2) For each of the following two stations, the ERP visual for each of the eight standard azimuths. CHAU-TV-5, Perce, P.Q. and CHAU-TV-1 Ste Marguerite Marie, P.Q. This is to be information from 1981 when both stations were on channel 2. These two requests are to be itemized separately, but will be made at the same time. 3) This request will be made at a time apart from the two above. For all low power/unprotected TV stations in Canada, the following: city of licence, channel, call sign, latitude and longitude of transmitter, average visual ERP, overall height above ground level or preferred EHAAT if available and input channel, where applicable.

Abandoned

23. Rationales for the classification evaluations of the following positions: DST-3836, DST-4848, DST-3534, DST-3623.

All disclosed

24. A list of all CATV companies in Canada; company name, address, postal code, phone number, number and sites of headends, number and sites of companies owned (ie. operating systems owned by a single MSO), top executives and name of chief tech (if available).

Abandoned

25. Information on the operation of satellite dishes and especially information concerning the newer Direct Broadcast System - the technology area rather than the entertainment or social impact.

Abandoned

26. Any and all information (records/documents/electronic recordings) of work done by Wilbert B. Smith concerning 1) Unidentified Flying Objects, Flying Saucers, Flying Discs, unknown aircraft, UFOs, or similar title 2) Geo-Magnetics 3) Gravity 4) Anti-gravity.

Disclosed in part, 19(1)

27. DOC-P20 Spectrum Management System (SMS) Database - In particular, frequencies, call signs, and locations of Canadian stations ie: marine, air, business, experimental, etc. from the VLF to the UHF spectrum all inclusive.

All disclosed

28. L'utilisation militaire de l'espace - un index détaillé de ces dossiers afin qu'il puisse sélectionner l'information pertinente à ses recherches. MDC-40, Télécommunications internationales; MDC-70, Programme spatial et développement industriel; MDC-80, Programme des télécommunications spatiales; MDC-90, Electronique spatiale; MDC-100, Systèmes spatiaux; MDC-110, Mécanique spatiale; MDC-120, Laboratoire David Florida; MDC-160, Recherche radar; MDC-180, Radiocommunications; MDC-190, Communications optiques; DMC-200, Recherche et développement en communications militaires

Abandoned

29. (2 requests)
Poll conducted by Goldfarb Consultants surveying attitudes of Canadians towards cultural issues such as support for Canadian film industry, quality of CBC, etc. as referred to in the Globe and Mail, 22 May 1984

All Disclosed

30. Re: CBC Tower, Penetanguishene, Ontario, 44o 46'10" N, 79o 59' 25" W. 1. Date Tower completed and technical data at that time. 2. Dates of additional work and items added to the tower. 3. All radiation surveys, dates, location of readings, equipment used, personnel who performed these surveys, and their status with CBC. 4. Future plans and data for this tower. 5. Dates and times when equipment was either reduced in power or altered. 6. Any legal actions in the past or present taken against any transmitting tower in Canada.

All disclosed

31. All records with respect to Requests for Access to records concerning Department of Communications Canada Gazette Notice DGTN-008-82/DGTR-017-82 dated October 15, 1982, entitled Cellular Mobile Radio Policy and Call for Licence Applications. All records of any requests for access to any records concerning any aspect of cellular radio.

Disclosed in part exemptions 19(1), 21(1)(a), 21(1)(b)

32. Evaluations for tax purposes of portable cultural objects by the Canadian Cultural Property Export Review Board. Such objects to have been donated to all public institutions in British Columbia between 1978 to date. Documents sought are minutes of meeting of board where evaluation of these objects has been discussed and made, any evaluations provided by outside consultants hired specifically to estimate value of such objects, any internal reports made by the Board's staff and/or secretariat related to such objects, any communications related to these objects made by public institutions in British Columbia, any communications to these public institutions made by Department of Communications, policy documents related to evaluation of cultural objects in general. DOC-230 - Taxation and the Arts.

Exempt, Section 24 (Section 241 of the income Tax Act)

33. Minutes of meetings, documents and correspondence involving the Department of Communications relating to meetings held in July and November of 1983 related to the granting of licences for cellular radio. Minutes of meetings, documents and correspondence relating to the granting of cellular licences involving the Priorities and Planning Committee of the Cabinet.

Abandoned

34. Records and reports with respect to Department of Communications Canada Gazette Notice DGTN-008-82/DGTR-017-82 dated October 15, 1982, entitled Cellular Mobile Radio Policy and Call for Licence Applications; And with respect to records and reports to the aforesaid call for applications and letter from Minister of Communications to all applicants dated August 18, 1983 and records and reports dated thereafter, etc.

Disclosed in part, Exemptions cited: 14, 15(1)(g), 15(1)(h), 15(1)(j), 19, 20(1)(a), 20(1)(b), 21(1)(a), 21(1)(b), 21(1)(d), 23

**REPORT ON PRIVACY
1984-1985**

A) Statistics



Government of Canada / Gouvernement du Canada

REPORT ON THE PRIVACY ACT

Institution Department of Communications	Reporting period April 1, '84 - March 31, '85
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I Requests under the Privacy Act

Received during reporting period	3
Outstanding from previous period	0
TOTAL	3
Completed during reporting period	3
Carried forward	0

II Disposition of requests completed

1. All disclosed	1	6. Insufficient information	0
2. Disclosed in part	1	7. Abandoned	0
3. Excluded	0	8. Does not exist	1
4. Exempt	0	TOTAL	3
5. Unable to process	0		

III Exemptions invoked

S. 18(2)	S. 21	S. 23(b)	
S. 19(1) (a)	S. 22(1) (a)	S. 24	
(b)	(b)	S. 25	
(c)	(c)	S. 26	
(d)	S. 22(2)	S. 27	1
S. 20	S. 23(a)	S. 28	

IV Exclusions cited

S. 69(1) (a)	
(b)	
S. 70(1)	
(a)	1
(b)	
(c)	
(d)	
(e)	
(f)	

V Completion time

Under 30 days	2
31 to 60 days	1
60 to 120 days	
Over 120 days	

VI Extensions

	Under 30 days	Over 30 days
Interference with operations		
Consultation	1	
Translations		
TOTAL	1	0

VII Translations

Translation requested	0
Translation provided	0
English to French	
French to English	
Average time to prepare translations	

VIII Method of access

Copies given	2
Examination	
Copies and examination	

IX Correction and notation

Corrections requested >	0	Corrections made >	0	Notation attached >	0
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X Costs

Personnel	\$	PY
Officer	\$ 14,558	0.376
Support staff	\$ 15,389	0.596
Other	\$ 14,025	--
TOTAL	\$43,972	0.972

XI Appeals to privacy commissioner

Reasons	
Use and disclosure	
Non disclosure	
Extension	
Publications	
Denial of translation	
Time to prepare a translation	
Other	
No. initiated during reporting period	0
No. completed during reporting period	
No. carried forward	0
Average time of resolution (for those completed) (days)	
Commissioner's recommendation accepted	
Commissioner's recommendation rejected	

XII Appeals to Federal Court

Appeal by	
Applicant	
Privacy commissioner	
Average time of resolution (for those completed) (days)	
No. initiated during reporting period	0
No. completed during reporting period	
No. carried forward	0
Disclosure ordered	
Non-disclosure ordered	
Other	

B) INTERPRETATION

Costs of the ATIP Secretariat

As in the first year of implementation of the Privacy Act, the Department only received 3 relatively simple requests for personal information. However, the ATIP Secretariat spent a significant portion of its time advising staff on the retention, protection, and disclosure of personal information. In 1983/84, only 10% of the ATIP Secretariat costs were attributed to implementation of the Privacy Act, but this figure was raised to 25% in the second quarter of 1984/85 in order to more accurately reflect this activity.

Personnel Costs

A system has been developed to track the time spent by other departmental personnel on each request, and on other activities such as briefing sessions, policy development, and activities related to the Index of Personal Information. Salary costs are reported quarterly, and the total costs are calculated as shown below:

Coordinator of Secretariat (1 officer)	25% of 1py X salary
Administrative Assistant (1 support position)	25% of 1py X salary
Computer Systems Assistant (1 support position 4/84 - 9/84)	25% of .416py X salary
Other personnel, calculated individually	time as % of py X salary

Operational Costs

Materials cost for response to each enquiry	100% of total
Access Inquiry database costs	25% of total
Other administrative costs such as photocopying, publications, travel, etc.	25% of total

C) SUPPORTING DOCUMENTATION

Organization of Privacy Activities

Privacy requests are routed to the ATIP Secretariat which was set up by the ATIP Coordinator to handle both access and privacy requests. The routing of documents has been explained in detail in section C of the Access to Information Report. Since the Department had only three requests during this reporting period, no additional procedures or consultation mechanisms have been set up. While the Department has yet to receive a request for notation to a file, the sample letters and forms recommended by Treasury Board are the documents prescribed for use in the Department of Communications.

The Department maintains an automated inventory of its personal information banks, including retention and disposal schedules and statements of the purposes and uses of personal information banks.

Records Management have undertaken a review of all retention schedules, to ensure that they are in accordance with the Act. Records audits were conducted during 1984/1985 both at headquarters and in the regions, and staff were briefed on the requirements of the Privacy Act in terms of reporting and protecting all personal information.

The Department has a decentralized file system in which each responsibility centre maintains a records system for its own programs. There are more than 80 such systems in operation within the Department. Records Management and the Access to Information and Privacy Secretariat maintain a centrally-managed database of Departmental file holdings, including EDP records, which lists all personal information. The database does not duplicate the personal information holdings, but provides finding aids to assist in locating the records requested. These finding aids include file numbers, responsibility centres, and the retention and disposal schedules for the documents. Cross references to the class of documents as recorded in the Access Register and the Index to Personal Information are included. The database is updated three times each week to ensure that the inventory is as up-to-date as possible and reflects all decentralized records systems.

Privacy Implementation

Administrative actions concerning privacy requests are documented in the Access Inquiry database described in section C of the Report on Access to Information. In addition to this, copies of the request for access are filed with the documents in question. All personnel have been advised of the requirement to handle notations to file, should they receive one, under section 12(2) of the Privacy Act.

Training in the handling of privacy requests and the impact of the new legislation was included in the ATIP briefing sessions held prior to the implementation of the legislation and shortly thereafter. During 1984/85, briefing sessions were held for regional staff in Vancouver, Montréal and Moncton. Managers of programs which involve the collection of personal information from the public have been alerted to their responsibilities and the rights of the public under the new legislation.

Formal and Informal Inquiries

Since the Department's policy has always been to release as much information as possible to the public through informal mechanisms, the impact of the Privacy Act in this area was to tighten up these practices. Directives have been sent to all staff to inform them of the types of information which may only be released by the Departmental Access to Information Coordinator. When an informal request for information which touches another's personal information is received, the individual is asked to contact the ATIP Secretariat, or the official dealing with the request consults the Secretariat for guidance. If the Department

is unable to release the information informally, and the individual is not satisfied, he may be assisted in preparing an access request. This assures him of his rights, and guarantees the safeguarding of the third party's personal information.

Departmental employees have for a number of years had the right to access their personnel records informally, and this practice has continued under the Act. Only in the following circumstances is an employee asked to complete a personal information request form:

- security file, when there is RCMP information
- job classification grievance
- health and safety, where there is sensitive information
- investigations file

D) INSTITUTIONAL POLICIES

After the first year of implementation of the Privacy Act, the following three target areas were selected for policy development in 1984/1985:

1) Policy of radio license information release

The Department maintains four personal information banks containing information pertaining to the management of radio licensing in Canada. These are the Radio Station Licensing Data Bank, the Radio Operator Certificate Bank, the Complaints and Suppressions - Interference Bank, and the Prosecutions - Illegal Radio Stations Bank. While there have been very few personal information requests for information in these banks, the information has been the subject of a great many ATI requests. The dilemma of finding a way to give as much access to the technical information involved, without violating an individual's privacy, has been more fully described on pages 11-14 of the Access Report.

It has been a policy for a number of years to protect the names and addresses of individuals when releasing lists of frequencies and licence holders. This has resulted in complaints from requestors, many of whom would like to know the names and addresses of those who may be sharing the radio spectrum with them, to whom they may be listening either inadvertently or deliberately, by means of sophisticated equipment such as programmable frequency scanners. One such complaint about the citing of section 19 of the Access to Information Act to protect this personal information has been investigated by the Information Commissioner.

In the definition of personal information given in section 3 of the Privacy Act, section (1) excludes, for the purposes of sections 7, 8, and 26 of the Privacy Act, and section 19 of the Access to Information Act:

"(1) information relating to any discretionary benefit of a financial nature, including the granting of a licence or permit, conferred on an individual, including the name of the individual and the exact nature of the benefit..."

In her findings, the Information Commissioner stated that this section stipulates that information relating to the granting of a licence is not personal information protected from disclosure. It is the view of this department that licensing information of an individual is personal information unless it relates to the granting of a discretionary benefit of a financial nature. Since the granting of most radio licences conveys only an indirect financial benefit, if any at all, most radio licensing information would therefore be considered to be personal information, where the licence is in the name of an individual.

The radio spectrum is a finite resource, and it is the responsibility of the Department to manage this resource for the benefit of all Canadians. In doing so, it has always been a policy to reveal as much information about the process as possible. It has been decided, therefore, that the public interest in knowing the names, call signs, and assigned frequencies of those who are licensed to use the spectrum clearly outweighs the invasion of privacy which could result from the disclosure of this data. The Minister is therefore prepared to release this information under section 8(2)(m)(i) of the Privacy Act, provided of course that it would not be protected from disclosure by any other section of the Access to Information Act.

2) Personal Information of Employees

The Department has in place informal mechanisms by means of which employees may have easy access to any files held in the Department which contain their personal information. Instances in which a personal information request form is requested are listed above under Formal and Informal Inquiries.

3) Classes of personal information

It was recognized that the listing of personal information in the 1984 Index of Personal Information was not complete. During 1984/1985, six additional personal information banks and five classes of personal information were reported for inclusion in the next Index of Personal Information.

E) DELEGATION INSTRUMENT

The Department put in effect on July 1, 1983 a delegation order which retains authority to release information under the Act at senior levels. The Deputy Minister is responsible for decisions

regarding all sections of the Act and the Departmental ATIP Coordinator is also responsible for decisions regarding all sections. The Coordinator of the ATIP Secretariat is responsible for sections 8(5) and 14 only when it is determined that access shall be given, and for section 15.

The Privacy Coordinator in the Department of Communications is the Director General of Personnel and Administration. Reporting to the Deputy Minister, this person has responsibility, among other areas, for Records Management and Personnel, two key areas in the implementation of the Privacy Legislation. Assisted by the staff of the ATIP Secretariat who implement policy and coordinate access and personal information requests, the Coordinator alone is responsible for advising the Minister or Deputy Minister on privacy matters. The Coordinator chairs the Corporate Review Panel, responds to requests for access, reports to Treasury Board on privacy activities, and formulates policy concerning privacy matters.

F) INVESTIGATIONS

There have been no investigations under the Privacy Act.

G) RELEASE OF INFORMATION UNDER 8(2)(e)

The Access to Information and Privacy Coordinator is authorized to approve disclosures to investigative bodies. In his absence, only the Deputy Minister or Minister may do so. Staff have been alerted to the requirement to direct all inquiries in this area to the ATIP Secretariat. When such a request is received, the Department will follow the procedures outlined in the ATIP Interim Policy Guide. A Personal Information Bank for this purpose had not yet been applied for at the end of the second year of implementation.

H) EXEMPT BANKS

There were no denials of access under the exempt bank section of the Act.

I) USE AND DISCLOSURE

The Department has been careful to ensure that personal information is being used only for purposes consistent with those for which it was gathered. Priority was placed during 1984/1985 on a comprehensive review of the uses and disclosures of radio licensing data, since the radio licensing databank contains the largest collection of personal information within the Department of Communications. District offices, responsible for the collection of radio licensing information, were asked to report all disclosures of this information, in order that we could get a comprehensive picture of our present practices. Each type of release was evaluated in terms of the ATIP legislation, and a draft policy has been formulated.

The 1985 Index to Personal Information will reflect with much greater accuracy the consistent uses of this information. Licence application forms are being redesigned, as part of the regular cycle of forms management, and will now include a statement of the disclosure policy.

Applicants to the many Cultural Affairs grants and certification programs will also be advised of their rights, following the principles outlined in section 3.5.1 of the Interim Policy Guide. It is expected that policy outlining standard clauses to be incorporated into all Departmental forms and application instructions used in the collection of personal information will be in place by the end of 1985.

1983-1984 Statistics



Government of Canada / Gouvernement du Canada

REPORT ON THE PRIVACY ACT

Institution DEPARTMENT OF COMMUNICATIONS	Reporting period JULY 1, 1983 - MARCH 31, 1984
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I Requests under the Privacy Act		II Disposition of requests completed			
Received during reporting period	3	1. All disclosed	2	6. Insufficient information	
Outstanding from previous period	0	2. Disclosed in part		7. Abandoned	
TOTAL	3	3. Excluded		8. Does not exist	1
Completed during reporting period	3	4. Exempt		TOTAL	3
Carried forward	0	5. Unable to process			

III Exemptions Invoked			IV Exclusions cited		
S. 18(2)	S. 21	S. 23(b)	S. 69(1) (a)		
S. 19(1) (a)	S. 22(1) (a)	S. 24	(b)		
(b)	(b)	S. 25	S. 70(1)		
(c)	(c)	S. 26	(a)		
(d)	S. 22(2)	S. 27	(b)		
S. 20	S. 23(a)	S. 28	(c)		
			(d)		
			(e)		
			(f)		

V Completion time		VI Extensions			VII Translations		VIII Method of access	
Under 30 days	3	Interference with operations	Under 30 days	Over 30 days	Translation requested	0	Copies given	1
31 to 60 days		Consultation			Translation provided	0	Examination	1
60 to 120 days		Translations			English to French		Copies and examination	
Over 120 days		TOTAL	0	0	French to English			
					Average time to prepare translations			

IX Correction and notation		
Corrections requested	0	Notation attached
Corrections made	0	

X Costs		
Personnel	\$	PY
Officer	\$ 6,250	0.140
Support staff	\$ 4,800	0.175
Other	\$ 650	--
TOTAL	\$ 11,700	0.315

XI Appeals to privacy commissioner	
Reasons	
Use and disclosure	
Non disclosure	
Extension	
Publications	
Denial of translation	
Time to prepare a translation	
Other	
No. initiated during reporting period	0
No. completed during reporting period	
No. carried forward	0
Average time of resolution (for those completed) (days)	
Commissioner's recommendation accepted	
Commissioner's recommendation rejected	

XII Appeals to Federal Court	
Appeal by	
Applicant	
Privacy commissioner	
Average time of resolution (for those completed) (days)	
No. initiated during reporting period	0
No. completed during reporting period	
No. carried forward	0
Disclosure ordered	
Non-disclosure ordered	
Other	

