

# **Annual Report**

**Privacy Act** 

April 1, 2023 to March 31, 2024

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# Introduction

### Purpose of the Privacy Act

The *Privacy Act* ("the Act") protects the privacy of all Canadian citizens and permanent residents regarding personal information held by a federal government institution. It also provides individuals with the right of access to their own personal information.

As a federal Crown corporation, the National Gallery of Canada ("the Gallery") is subject to the *Privacy Act*. Section 72 of the Act requires that the head of every government institution submit an annual report to Parliament on the administration of the Act during the financial year. The Annual Report is prepared and tabled in Parliament in accordance with section 72 of the Act and describes how the Gallery administered the Act during the period of April 1, 2023 to March 31, 2024.

# NGC Background

The National Gallery of Canada was founded in 1880 by the then-Governor General, the Marquess of Lorne, in concert with the Royal Canadian Academy of Arts. With the enactment of the 1913 *National Gallery of Canada Act*, the federal government assumed responsibility for the Gallery. The government continued its stewardship through successive Acts of Parliament, culminating with the *Museums Act* of July 1, 1990, which established the Gallery as a Crown corporation.

# Gallery Mandate, Authorities, and Public Policy Role

As per the *Museums Act*, 1990, c. 5, the National Gallery of Canada's mandate is to develop, maintain, and make known, throughout Canada and internationally, a collection of works of art, both historic and contemporary, with special, but not exclusive, reference to Canada, and to further knowledge, understanding, and enjoyment of art in general among all Canadians.

As a distinct legal entity, wholly owned by the Crown, the Gallery is a parent Crown corporation with agent status, is listed in Schedule 3, Part 1 of the *Financial Administration Act* (FAA) and is subject to the Crown corporation accountability framework established under Part X of the FAA. The Gallery has no non-operational subsidiaries.

The Gallery reports to the Parliament of Canada through the Minister of Canadian Heritage. Although it functions at arm's length from the federal government in its daily operations, as a member of the Canadian Heritage portfolio, the Gallery supports the Department in its mission, and contributes to government priorities.

Under the *Museums Act*, the Gallery plays an essential role, individually and together with other museums and like institutions, in preserving and promoting the heritage of Canada and all its peoples throughout Canada and abroad, and in contributing to the collective memory and sense of identity of all Canadians. As a source of inspiration, research, learning and entertainment, the Gallery provides, in both official languages, services that are essential to Canadian culture, and available to all.

# **Organizational Structure and Delegation Order**

The Gallery's activities in relation to the *Privacy Act* are managed on a part-time basis by a member of the Corporate Secretariat who holds the position of Board and Access to Information and Privacy (ATIP) Coordinator, and to whom the Director and CEO has delegated all powers, duties, and functions for the administration of the Act. A copy of the signed and dated Delegation Order that was in effect at the end of the reporting period is attached as Appendix 1.

During the reporting period, the ATIP Coordinator was supported by two part-time consultants.

The ATIP Coordinator position is responsible for the following activities:

- processing formal requests under the *Access to Information Act* and *Privacy Act* (together "the Acts"), as well as informal requests for information and consultation requests from other government institutions;
- providing ongoing advice and guidance to senior management and Gallery staff on access to information and privacy legislation and related policies, privacy risk management activities, and other related matters;
- monitoring Gallery compliance with the Acts, its Regulations, and relevant policies and procedures;
- acting on behalf of the Gallery in dealings with the Treasury Board of Canada Secretariat (TBS), the Offices of the Information Commissioner and Privacy Commissioner, as well as other government institutions, regarding the administration of the Act as it relates to the Gallery;
- preparing annual reports to Parliament, in addition to other statutory reports and material that may be required by central agencies;
- coordinating the annual update of *Info Source* and informing TBS of any changes to the Gallery's Personal Information Banks (PIBs);
- promoting awareness of the Acts, its Regulations, and relevant procedures throughout the Gallery; and

- participating in government-wide forums for the ATIP community, including TBS community and ATIP Coordinator meetings, as well as ad-hoc working groups and training sessions.

Section 73.1(1) of the *Privacy Act* authorizes a government institution to provide services related to any power, duty or function conferred or imposed on the head of a government institution under the *Privacy Act* to another government institution that is presided over by the same Minister or that is under the responsibility of the same Minister. Such services may be provided only if the government institution enters into a written agreement with the other institution. During the reporting period, the Gallery was not party to any agreement pursuant to section 73.1(1).

### Performance 2023-2024

This section includes information about the processing of requests under the *Privacy Act* in 2023-24, and an interpretation of the 2023-24 Statistical Report found at Appendix 2.

**Section 1: Formal Requests Received** 

Number of Requests	2023-24	2022-23	2021-22
Received during the reporting	0	1	0
period			
Outstanding from previous	0	0	1
period			
Total (All requests)	0	1	1

No formal requests for personal information under the Act were received during the reporting period. This represents a slight decrease in comparison to the 2022-23 reporting period (one request) and is the same as 2021-22 (no requests).

There were no active requests as of the last day of the reporting period.

# Section 2: Requests Closed During the Reporting Period

# Legislated Timelines and Completion Times

Nothing to report. No requests were received or processed.

### **Extensions**

Nothing to report. No requests were received or processed.

### Disposition of Requests, Exemptions and Exclusions

Nothing to report. No requests were received or processed.

# Relevant Pages Processed and Disclosed

Nothing to report. No requests were received or processed.

# Section 3: Requests for Correction of Personal Information and Notations

As was the case for the last three reporting periods, there were no requests for correction of personal information and/or notations in 2023-24.

# Section 4: Consultations Received from Other Institutions and Organizations

There were no requests for consultations from other government institutions and/or organizations during the reporting period. This has been the case for the last three reporting periods.

# **Section 5: Completion Time of Consultations on Cabinet Confidences**

There were no consultations on Cabinet confidences. This has been the case for the last three reporting periods.

# Section 6: Complaints, Audits, and Investigations

No complaints relating to the Gallery were filed with the Office of the Privacy Commissioner during the reporting period, and no audits or investigations were initiated or concluded. As such, there were no active complaints as of the last day of the reporting period.

### **Section 7: Resources**

### Costs

For 2023-24, the cost directly associated with the administration of the *Privacy Act* was estimated at \$71,664.00 for salaries, professional services contracts, and other administrative expenses. This represents a significant increase over \$10,200.00 reported in 2022-23, and \$17,698.00 reported in 2021-22.

The increased cost reflects the significant work conducted throughout the reporting period to meet privacy compliance obligations and foster a culture of privacy throughout the organization, as highlighted in this report.

### **Human Resources**

For the reporting period, the number of full-time equivalents (FTE) dedicated to the administration of the *Privacy Act* was estimated at 0.369, an increase compared to the 0.136 FTE reported for 2022-23, as well as the 0.261 FTE reported for 2021-22.

Reported costs do not include resources required by other areas of the Gallery in support of privacy compliance obligations.

The 0.369 FTE for 2023-24 includes both staff and consultant costs.

# **Training and Awareness**

In the second half of the reporting period, the Gallery initiated all staff privacy training. Topics included the definition of personal information, employee roles and responsibilities, privacy risk management, practical privacy tips, privacy breach response, and requests for personal information. 23 participants attended the training. Additional sessions will be delivered in the 2024-25 reporting period with a view to ensuring all staff receive training.

Briefings were provided to the new Director and CEO to inform on the Gallery's *Privacy Act* obligations and in the context of renewing the Delegation Order.

The ATIP Coordinator and part-time consultants provided periodic one-on-one advice and guidance to NGC staff and management on privacy matters, as needed.

# Policies, Guidelines, and Procedures

The development of a new corporate Privacy Policy and Privacy Breach Procedures continued during the reporting period. Due to the ongoing management of multiple privacy projects as well as high-volume *Access to Information Act* requests throughout the reporting period, the documents are expected to be implemented in 2024-25.

The Gallery's <u>Information Resource Management Policy</u> was updated to incorporate a distinct section to delineate the ATIP Coordinator's leading advisory role for the protection of personal information held by the Gallery among other duties. Key roles and responsibilities for all employees to support the Gallery's obligations under the Act were included, as well as specific requirements pertaining to privacy breaches, requests for personal information, establishing personal information bank descriptions, and measures for contracting and establishing agreements with other entities. The Gallery's new Programming Policy was also reviewed for privacy policy considerations.

The ATIP Office continued to provide ad hoc support and risk management advice to internal stakeholders in relation to a variety of initiatives involving personal information.

As there were no new collections or new consistent uses of Social Insurance Numbers during the reporting period, the Gallery did not implement any policies, guidelines, or procedures to that effect.

# **Initiatives and Projects to Improve Privacy**

Throughout 2023-24, the Gallery continued the process of onboarding to the Government of Canada ATIP Online Request service and was successfully onboarded in early 2024-25.

During the reporting period, the Gallery made significant effort to recruit ATIP staff but was unable to secure additional permanent staff. The shortage of well-qualified ATIP candidates in the market remains a challenge for the Gallery's ATIP operations.

# Summary of Key Issues and Actions Taken on Complaints or Audits

No complaints were received, and no audits or investigations were concluded during the reporting period. There were no complaints outstanding from the previous reporting period. Accordingly, there were no active complaints as of the last day of the reporting period.

# **Monitoring Compliance**

Requests are regularly monitored by the ATIP Coordinator through a tracking log, which records detailed information concerning the timeline of each request. As no requests or very few requests are received each year, the monitoring of time to process information requests is a straightforward exercise.

Based on the nature of the privacy requests received by the Gallery, inter-institutional consultations are generally not required. Further, and due to the small number of privacy requests received year over year, the ATIP Coordinator would be informed of any intention to consult and decide whether such consultation is necessary for the proper exercise of discretion or when there is an intention to disclose.

Regarding monitoring for frequently requested types of information and the feasibility of making that information available by other means, again, due to the small number of requests received, such trends would easily identifiable and considered by the ATIP Office as applicable.

While there is no formal monitoring in place regarding access to information and privacy clauses in contracts and agreements, the Gallery has implemented standard measures to promote the rights afforded under the *Access to Information Act* and *Privacy Act*. Standard instructions and clauses related to access to information and privacy are included in Request for Proposal processes and published on gallery.ca. These clauses are also included in all contracts. In addition, the ATIP Office and/or external legal counsel are engaged by programs areas and procurement on an ad hoc basis, to implement more detailed clauses for contracts and agreements requiring heightened administrative safeguards.

# **Material Privacy Breaches**

No material privacy breaches occurred during the reporting period. Accordingly, no material privacy breaches were reported to the Office of the Privacy Commissioner and TBS.

# Privacy Impact Assessments, Personal Information Banks, and Privacy Protocols

### **Privacy Impact Assessments**

One previously completed Privacy Impact Assessment (PIA) was modified in relation to the Gallery's ticketing and membership system. The system enables the Gallery to better foster relationships with its visitors, members, donors, and sponsors, providing an integrated view of the overall activities and experiences of these stakeholders. The modified PIA analyzed the personal information practices associated with the system for relevance, and in response to comments received from TBS and the Office of the Privacy Commissioner concerning the initial PIA.

A summary of the PIA is available on gallery.ca: <a href="https://www.gallery.ca/about/governance/corporate-reports">https://www.gallery.ca/about/governance/corporate-reports</a>

A PIA for the Gallery's new Financial Management System was ongoing during the reporting period.

### **Personal Information Banks**

Personal information banks (PIBs) are descriptions of personal information held by federal institutions that is organized and retrievable by an individual's name or other identifiable information. As a key transparency and accountability tool, PIBs describe personal information that has been or is being used, or is available, for decision making purposes. PIBs describe how personal information is collected, used, disclosed, retained and/or disposed of in the administration of a program or activity. The publication of PIB descriptions is a legislative requirement.

As part of the above noted PIA modification, the following PIB descriptions were developed and submitted to TBS for registration:

- New PIB for Visitor Experience
- Modified PIB for Annual Giving and Financial Donations

To reflect current retention and disposition practices for personal information, five other Gallery PIB modifications were submitted to TBS for registration.

All above noted PIB changes were registered by TBS in early 2024-25 and will therefore be reflected in the statistical forms next reporting period.

All PIB descriptions are published in the Gallery's Info Source publication.

### **Privacy Protocols**

A privacy protocol is a risk mitigation tool to ensure sound privacy practices when using personal information for non-administration purposes. A non-administrative use of personal information is one in which the information is not used for decision making processes directly affecting individuals.

In support of the Gallery's privacy risk management function and to ensure compliance with TBS privacy policy, seven privacy protocols were completed during the reporting period. Examples include privacy reviews of various survey initiatives, the use of new technology to receive donations onsite, and a research initiative with an outside entity.

# **Public Interest Disclosures**

Section 8(2)(m) of the *Privacy Act* allows the head of the institution to exercise the discretion to disclose personal information, without the consent of the individual, if such disclosure is deemed to be in the public interest further to careful review of relevant factors.

During the reporting period, no disclosures of personal information were made pursuant to section 8(2)(m) of the *Privacy Act*.

Appendix 1 – Delegation Order on the *Privacy Act* 

Appendix 2 – Statistical Report on the *Privacy Act* and Supplemental Statistical Report

The Director of the National Gallery of Canada, as designated head of the institution by virtue of Order-in-Council and pursuant to section 73 of the *Privacy Act* (the *Act*) hereby designates the persons holding the positions set out herein or the persons occupying those positions on an acting basis, to exercise the powers, duties or functions of the Director as the head of a government institution, under the section or sections of the *Act* set out hereunder opposite each position.

Position	Privacy Act		
Access to Information and Privacy Coordinator	8(2)(j)	Disclose personal information for research purposes	
Access to Information and Privacy Coordinator	8(2)(m)	Disclose personal information in the public interest or in the interest of the individual	
Access to Information and Privacy Coordinator	8(4)	Retain copy of 8(2)(e) requests and disclosed records	
Access to Information and Privacy Coordinator	8(5)	Notify Privacy Commissioner of 8(2)(m) disclosures	
Access to Information and Privacy Coordinator	9(1)	Retain record of use	
Access to Information and Privacy Coordinator	9(4)	Notify Privacy Commissioner of consistent use and amend index	
Access to Information and Privacy Coordinator	10	Include personal information in personal information banks	
Access to Information and Privacy Coordinator	14	Respond to request for access within 30 days; give access or give notice	
Access to Information and Privacy Coordinator	15	Extend time limit for responding to request for access	
Access to Information and Privacy Coordinator	16	Provide notice of refusal to give access to personal information	
Access to Information and Privacy Coordinator	17(2)(b)	Decide whether to translate requested information	

Position		Privacy Act
Access to Information and Privacy Coordinator	17(3)(b)	Alternative format
Access to Information and Privacy Coordinator	18(2)	May refuse to disclose personal information contained in an exempt bank
Access to Information and Privacy Coordinator	19(1)	Shall refuse to disclose personal information obtained in confidence from another government
Access to Information and Privacy Coordinator	19(2)	May disclose any personal information referred to in 19(1) if the other government consents to the disclosure or makes the information public
Access to Information and Privacy Coordinator	20	May refuse to disclose personal information injurious to the conduct of federal- provincial affairs
Access to Information and Privacy Coordinator	21	May refuse to disclose personal information injurious to international affairs or defence
Access to Information and Privacy Coordinator	22	May refuse to disclose personal information prepared by an investigative body, information injurious to the enforcement of a law, or information injurious to the security of penal institutions
Access to Information and Privacy Coordinator	22.3	Shall refuse to disclose personal information that was created for the purpose of making a disclosure under the <i>Public Servants Disclosure Protection Act</i> or in the course of an investigation into a disclosure under that Act.
Access to Information and Privacy Coordinator	23	May refuse to disclose personal information prepared by an investigative body for security clearances
Access to Information and Privacy Coordinator	24	May refuse to disclose personal information about individuals sentenced for an offence.
Access to Information and Privacy Coordinator	25	May refuse to disclose personal information which could threaten the safety of individuals
Access to Information and Privacy Coordinator	26	May refuse to disclose personal information about another individual, and shall refuse to disclose such information where disclosure is prohibited under Section 8
Access to Information and Privacy Coordinator	27	May refuse to disclose personal information subject to solicitor-client privilege

Position		Privacy Act
Access to Information and Privacy Coordinator	27.1	May refuse to disclose any personal information requested under subsection 12(1) that is subject to the privilege set out in section 16.1 of the <u>Patent Act</u> or section 51.13 of the <u>Trade-marks Act</u> .
Access to Information and Privacy Coordinator	28	May refuse to disclose personal information relating to the individual's physical or mental health where disclosure is contrary to the best interests of the individual
Access to Information and Privacy Coordinator	33(2)	Right to make representations to the Privacy Commissioner during an investigation
Access to Information and Privacy Coordinator	35(4)	Give complainant access to information after 35(1)(b) notice
Access to Information and Privacy Coordinator	51(2)(b)	Request that Section 51 hearing be held in the National Capital Region
Access to Information and Privacy Coordinator	72(1)	Prepare Annual report to Parliament

Position	Privacy Regulations		
Access to Information and Privacy Coordinator	9	Reasonable facilities and time provided to examine personal information	
Access to Information and Privacy Coordinator	11(2)	Notification that correction to personal information has been made	
Access to Information and Privacy Coordinator	11(4)	Notification that correction to personal information has been refused	
Access to Information and Privacy Coordinator	13(1)	Disclosure of personal information relating to physical or mental health may be made to qualified medical practitioner or psychologist for an opinion on whether to release information to requestor	

Position	Privacy Regulations		
Access to Information and Privacy Coordinator	14	Disclosure of personal information relating to physical or mental health may be made to requestor in presence of qualified medical practitioner or psychologist	

Dated at Ottawa on Ochber 5, 2023

Jean-François Bélisle

Director and CEO, National Gallery of Canada



# Statistical Report on the *Privacy Act*

Name of institution:	The National Gallery of Canada		
Reporting period:	4/1/2023	to	3/31/2024

### Section 1: Requests Under the Privacy Act

### 1.1 Number of requests received

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

### 1.2 Channels of requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

# **Section 2: Informal requests**

### 2.1 Number of informal requests

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

### 2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

### 2.3 Completion time of informal requests

	Completion Time							
0 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	
0	0	0	0	0	0	0	0	

### 2.4 Pages released informally

Less The Pages R	nan 100 eleased	100- Pages R		501-1000 1001-5000 More Than 500 Pages Released Pages Released 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
0	0	0	0	0	0	0	0	0	0

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

### 3.1 Disposition and completion time

		Completion Time							
Disposition of Requests	0 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	
All disclosed	0	0	0	0	0	0	0	0	
Disclosed in part	0	0	0	0	0	0	0	0	
All exempted	0	0	0	0	0	0	0	0	
All excluded	0	0	0	0	0	0	0	0	
No records exist	0	0	0	0	0	0	0	0	
Request abandoned	0	0	0	0	0	0	0	0	
Neither confirmed nor denied	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	

### 3.2 Exemptions

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

### 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	E-record	Data set	Video	Audio	Other
0	0	0	0	0	0

### 3.5 Complexity

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

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

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

	Less Th Pages Pr		100- Pages Pr		501-1 Pages Pro		1001- Pages Pr			han 5000 rocessed
Disposition	Number of Requests	Pages Processed	Number of Requests	Pages Processed						
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

### 3.5.3 Relevant minutes processed and disclosed for <u>audio</u> formats

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

### 3.5.4 Relevant minutes processed per request disposition for <u>audio</u> formats by size of requests

	Less than 60 Minut	es processed	60-120 Minutes p	rocessed	More than 120 Minutes processed		
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed	
All disclosed	0	0	0	0	0	0	
Disclosed in part	0	0	0	0	0	0	
All exempted	0	0	0	0	0	0	
All excluded	0	0	0	0	0	0	
Request abandoned	0	0	0	0	0	0	
Neither confirmed nor denied	0	0	0	0	0	0	
Total	0	0	0	0	0	0	

### 3.5.5 Relevant minutes processed and disclosed for $\underline{\text{video}}$ formats

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

### 3.5.6 Relevant minutes processed per request disposition for $\underline{\text{video}}$ formats by size of requests

	Less than 60 Minutes processed		60-120 Minutes p	rocessed	More than 120 Minutes processed		
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed	
All disclosed	0	0	0	0	0	0	
Disclosed in part	0	0	0	0	0	0	
All exempted	0	0	0	0	0	0	
All excluded	0	0	0	0	0	0	

Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

### 3.5.7 Other complexities

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

### 3.6 Closed requests

### 3.6.1 Number of requests closed within legislated timelines

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

#### 3.7 Deemed refusals

### 3.7.1 Reasons for not meeting legislated timelines

	Principal Reason					
Number of requests closed past the legislated timelines	Interference with operations / Workload	External Consultation	Internal Consultation	Other		
0	0	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	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

### 3.8 Requests for translation

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

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

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

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

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

# Section 6: Extensions

### 6.1 Reasons for extensions

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

### 6.2 Length of extensions

	15(a)(i) Interference with operations				15 (a)(ii			
Length of Extensions	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are	Cabinet ConfidenceSection (Section 70)	External	Internal	15(b) Translation purposes or conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

# Section 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	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

	Number of Days Required to Complete Consultation Requests								
Recommendation	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to	181 to 365 Days	More Than 365 Days	Total	
Disclose entirely	0	0	0	0	0	0	0	0	
Disclose in part	0	0	0	0	0	0	0	0	
Exempt entirely	0	0	0	0	0	0	0	0	
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	
Total	0	0	0	0	0	0	0	0	

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

	ı	Number of	days requi	red to co	mplete co	nsultation	requests	3
Recommendation	0 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
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
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
Total	0	0	0	0	0	0	0	0

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

### 8.1 Requests with Legal Services

	Fewer The Pages Pro		100-500 Pages Processed		501-1000 1001-5000 Pages Processed Pages Processed		More than 5000 Pages Processed			
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

### 8.2 Requests with Privy Council Office

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

### Section 9: Complaints and Investigations Notices Received

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

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

### 10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	1

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

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	10	0	0	0
Central	0	0	0	0
Total	10	0	0	0

### **Section 11: Privacy Breaches**

#### 11.1 Material Privacy Breaches reported

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

### 11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	1

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

#### 12.1 Allocated Costs

Expenditures	Amount	
Salaries		\$9,388
Overtime	\$0	
Goods and Services		\$62,276
Professional services contracts	\$62,276	
Other	\$0	
Total		\$71,664

#### 12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.084
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.285
Students	0.000
Total	0.369

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



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

Name of institution:	The National Gallery of Ca			
Reporting period:	2023-04-01	to	2024-03-31	

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

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

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are Beyond Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	2	0	2
Received in 2022-23	0	2	2
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
Total	2	2	4

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

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints	
Received in 2023-24	0	
Received in 2022-23	0	

Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	0

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

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

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

2.2 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 2023-24	0	
Received in 2022-23	0	
Received in 2021-22	0	
Received in 2020-21	0	
Received in 2019-20	0	
Received in 2018-19	0	
Received in 2017-18	0	
Received in 2016-17	0	
Received in 2015-16	0	
Received in 2014-15 or earlier	0	
Total	0	

# Section 3: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in	
2023-24?	No

# Section 4: Universal Access under the Privacy Act

How many requests were received from foreign nationals outside of Canada in	0
2023-24?	U

**Canadä**