

Public Health Agency of Canada

Annual Report on the *Access to Information Act* and *Privacy Act*

2024-2025



Public Health
Agency of Canada

Agence de la santé
publique du Canada

Canada

To promote and protect the health of Canadians through leadership, partnership, innovation and action in public health.

—Public Health Agency of Canada’s mission statement

Également disponible en français sur le site Web de l’Agence de la santé publique du Canada sous le titre : Rapport annuel 2024-2025 sur la *Loi sur l’accès à l’information* et la *Loi sur la protection des renseignements personnels*

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Introduction

The Public Health Agency of Canada is pleased to present to Parliament its consolidated annual report on the administration of Access to Information and Privacy (ATIP) services, in accordance with section 94 of the *Access to Information Act* (ATIA) and section 72 of the *Privacy Act*. The report describes activities that support compliance with these laws for the fiscal year beginning April 1, 2024 and ending March 31, 2025.

About the Public Health Agency of Canada

The Public Health Agency of Canada is part of the federal health portfolio. Its activities focus on protecting against threats to public health, preventing and reducing diseases and injury, and promoting health, well-being, and equity.

The Public Health Agency of Canada does not have any entities with no employees or assets (non-operational ‘paper’ subsidiaries).

For more information about the Public Health Agency of Canada, please [visit our website](#).

Purpose of the Acts

The ATIA gives Canadian citizens, permanent residents of Canada, and anyone present in Canada the right to access information contained in federal government records, subject to certain specific and limited exceptions. The ATIA complements, but does not replace, other means of obtaining government information.

The *Privacy Act* protects an individual's privacy by setting out provisions related to the collection, retention, accuracy, disposal, use and disclosure of personal information. It also gives individuals the right of access to information about themselves held by the federal government, with certain specific and limited exceptions.

The ATIA and *Privacy Act* enhance accountability and transparency of federal institutions, promoting an open and democratic society.

Organizational structure

Shared services partnership agreement

Housed within Health Canada’s Corporate Service Branch, the Access to Information and Privacy Services Directorate (ATIPSD) was formed in 2024-2025 and comprises two divisions: ATIP Operations Division and the Privacy Management Division. Prior to this, both divisions were part of the Corporate Policy, Planning and Services Directorate within Corporate Services Branch. The new directorate supports both Health Canada and the Public Health Agency of Canada under the Shared Services Partnership Agreement. This

restructure was implemented to elevate the role of access to information and privacy within the Public Health Agency of Canada. Although services are provided to both institutions, only the Public Health Agency of Canada's statistics and financial data are included in this report.

Access to Information and Privacy Operations Division

The primary function of the ATIP Operations Division is to ensure compliance of the Public Health Agency of Canada's program delivery with the provisions of the ATIA, the *Privacy Act*, and related policies and directives of the Treasury Board of Canada Secretariat. Key responsibilities include:

- Managing and responding to access to information and personal information requests;
- Providing training and promoting awareness of access to information and privacy obligations; and
- Responding to investigations related to access to information and personal information requests.

In 2024-2025, there were 40.10 full-time equivalents within the ATIP Operations Division supporting the Public Health Agency of Canada's administration of both the ATIA and the *Privacy Act*. A breakdown of full-time equivalents by category is provided in the table below.

Privacy Management Division

The primary functions of the Privacy Management Division include supporting compliance of the Public Health Agency of Canada's program delivery with the provisions of the *Privacy Act* and the privacy-related policies and directives of the Treasury Board of Canada Secretariat. Key responsibilities include:

- The development of privacy policies, procedures and practices;
- The delivery of privacy training and awareness programs to staff;
- Assessing and reporting on privacy breaches;
- Providing review and attestation of Treasury Board Submissions and Memoranda to Cabinet as Privacy Functional Area;
- Providing review and approval of section 8(2)(j) disclosures (for research) and section 8(2)(m) disclosures (for public interest or to benefit the individual);
- Coordinating the Agency's InfoSource input; and
- Providing privacy analysis and advice using a number of tools including Privacy Impact Assessments (PIA) and Privacy Protocols.

In 2024-2025, there were 8.349 full-time equivalents within the Privacy Management Division supporting compliance of the Public Health Agency of Canada's program delivery

with the provisions of the *Privacy Act* and the privacy-related policies and directives of the Treasury Board of Canada Secretariat. A breakdown of full-time equivalents by category is provided in the table below.

Total full-time equivalents supporting the *Access to Information Act* and the *Privacy Act*

In 2024-2025, there were a total of 48.444 full-time equivalents supporting the administration of the ATIA and the *Privacy Act*. This comprised 35.464 full-time equivalents supporting the ATIA and 12.98 full-time equivalents supporting the *Privacy Act*. The following table outlines resources by Act and division.

Total full-time equivalents supporting the ATIA and the *Privacy Act* by Division

Type of full-time equivalents	ATIA	<i>Privacy Act</i>	<i>Privacy Act</i>	Total
	ATIP Operations	ATIP Operations	Privacy Management Division	
Full-time employees	31.188	4.073	6.882	42.143
Part-time and casual employees	1.633	0.213	0.758	2.604
Regional staff	0.000	0.000	0.000	0.000
Consultants and agency personnel	2.643	0.345	0.143	3.131
Students	0.000	0.000	0.566	0.566
Total full-time equivalents ATIA and <i>Privacy Act</i>	35.464	4.631	8.349	48.444

For a breakdown of the groups and/or positions responsible for meeting proactive publication requirements under Part 2 of the ATIA, see the section on proactive publication below.

Governance

Initiatives related to access to information and privacy are governed through the ATIP Executive Leaders Committee. This committee is made up of executive-level representatives from across the Public Health Agency of Canada who provide leadership and strategic direction on key topics and are responsible for communicating them within their respective branches.

The Executive Leaders Committee is chaired by the Executive Director, Access to Information and Privacy Services Directorate, Corporate Services Branch, who is responsible for the ATIP Operations Division and the Privacy Management Division.

ATI and privacy matters requiring a higher level of oversight or strategic direction may also be brought forward to the Public Health Agency of Canada’s Executive Committee.

Delegation of authority

In keeping with Treasury Board of Canada Secretariat recommendations on best practices, the Delegation Order extends authorities to multiple positions including the President, the Corporate Services Branch’s Assistant Deputy Minister, the Director General of Corporate Policy, Planning and Services Directorate, the Executive Director of ATIP Operations Division and ATIP Coordinator, and the Director of the Privacy Management Division.

As appropriate, certain administrative authorities are delegated to various senior levels within the ATIP Operations Division to support the effective and efficient administration of the ATIA and the *Privacy Act*. The delegation order that was in effect at the end of 2024-2025 is included in this report ([Appendix A](#)).

Proactive publication under Part 2 of the Access to Information Act

The Public Health Agency of Canada is a government institution that is listed in Schedule I of the *Financial Administration Act* for the purposes of Part 2 of the ATIA.

The ATIP Operations Division worked with the Strategic Policy Branch, Chief Financial Officer Branch, Corporate Services Branch and the Communications and Public Affairs Branch to ensure that records identified under Part 2 of the *Access to Information Act* are proactively published. Existing procedures were leveraged to facilitate the proactive publication of information.

Branches involved in proactive publication use trackers with deadlines to monitor the timeliness of published information. There are also quality assurance teams that regularly validate that the accuracy and completeness of information proactively published.

Below are tables that outline the types of proactive publications and the percentage that are published within legislative timelines.

Applies to all Government Institutions as defined in section 3 of the Access to Information Act

Legislative Requirement	Section of ATIA	Publication Timeline	Does the requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% published within legislated timelines	Link to web page where published
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Y	Accounting Operations Division, Chief Financial Officer Branch, Health Canada	100%	Government Travel Expenses
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Accounting Operations Division, Chief Financial Officer Branch, Health Canada	100%	Hospitality Expenses
Reports tabled in Parliament	84	Within 30 days after tabling	Y	Each program responsible for preparing the report that is tabled	100%	various

Applies to government entities or Departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the Financial Administration Act

Legislative Requirement	Section of ATIA	Publication Timeline	Does the requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% published within legislated timelines	Link to web page where published
Contracts over \$10,000	86	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	Y	Procurement and Investment Management Directorate, Chief Financial Officer Branch, Health Canada	100%	Search Government Contracts over \$10,000
Grants & Contributions over \$25,000	87	Within 30 days after the quarter	Y	Centre for Grants and Contributions, Chief Financial Officer and Corporate Management Branch	100%	Grants and Contributions
Packages of briefing materials prepared for	88(a)	Within 120 days after appointment	Y	Corporate Secretariat Directorate,	N/A for 2024-25	Open Government Portal

Legislative Requirement	Section of ATIA	Publication Timeline	Does the requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% published within legislated timelines	Link to web page where published
new or incoming deputy heads or equivalent				Office of the President		
Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that is received by their office	88(b)	Within 30 days after the end of the month received	Y	Corporate Secretariat Directorate, Office of the President	100%	Briefing Note Titles and Numbers
Packages of briefing materials prepared for a deputy head or equivalent's appearance before a committee of Parliament	88(c)	Within 120 days after appearance	Y	Corporate Secretariat Directorate, Office of the President	100%	Open Government Portal

Applies to government institutions that are departments named in Schedule I to the Financial Administration Act or portions of the core public administration named in Schedule IV to that Act (i.e. government institutions for which Treasury Board is the employer)

Legislative Requirement	Section of ATIA	Publication Timeline	Does the requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% published within legislated timelines	Link to web page where published
Reclassification of positions	85	Within 30 days after the quarter	Y	Human Resources Services Directorate, Corporate Services Branch, Health Canada	100%	Position Reclassification

Applies to Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office)

Legislative Requirement	Section of ATIA	Publication Timeline	Does the requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% published within legislated timelines	Link to web page where published
Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	Y	Published by Health Canada for the Public Health Agency of Canada.	N/A for 2024-25	Open Government Portal
Titles and reference numbers of memoranda prepared by a government institution for the minister, that is received by their office	74(b)	Within 30 days after the end of the month received	Y	Corporate Secretariat Directorate, Office of the President	100%	Open Government Portal
Package of question period notes prepared by a government institution for the minister and in use on the last sitting day of the House of Commons in June and December	74(c)	Within 30 days after last sitting day of the House of Common in June and December	Y	Published by Health Canada for the Public Health Agency of Canada.	N/A	Question Period Notes
Packages of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament	74(d)	Within 120 days after appearance	Y	Corporate Secretariat Directorate, Office of the President	100%	Open Government Portal
Travel Expenses	75	Within 30 days after the end of the	Y	Accounting Operations Division, Chief	100%	Government Travel Expenses

Legislative Requirement	Section of ATIA	Publication Timeline	Does the requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% published within legislated timelines	Link to web page where published
		month of reimbursement		Financial Officer Branch, Health Canada		
Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	Y	Accounting Operations Division, Chief Financial Officer Branch, Health Canada	100%	Hospitality Expenses
Contracts over \$10,000	77	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	Y	Procurement and Investment Management Directorate, Chief Financial Officer Branch, Health Canada	100%	Search Government Contracts over \$10,000
Ministers' Offices Expenses on behalf of all institutions.	78	Within 120 days after the fiscal year	Y	Note: This consolidated report is currently published by TBS	N/A	Expenditures of Ministers' Offices Open Government - Government of Canada

Performance for 2024-2025

In 2024-2025, the Public Health Agency of Canada received 990 requests (Access to Information, Access Informal and Privacy) and closed 1,054. The Public Health Agency of Canada closed more requests than it received during this period. When compared to the previous fiscal year, the Public Health Agency of Canada received 116% more requests. This is due to an increase in the number of access informal requests that were made.

Type of request	Received	Closed
Access to Information	181	268
Access Informal	778	751
Privacy	31	35
Total	990	1,054

The following sections of the report include an interpretation and explanation of the data contained in Public Health Agency of Canada's Statistical Report, which summarizes

Access to Information (ATI) and Privacy-related activities for the period between April 1, 2024 and March 31, 2025. This data can be found in the [Open Government Portal: Access to Information and Privacy Statistics](#).

Data quality

It should be noted that minor data variances may occur from year to year, including in previously reported figures, such as the number of outstanding requests carried forward into the current fiscal year, material privacy breaches, or completed Privacy Impact Assessments. These variances arise due to a number of factors, including re-opened access to information requests at the request of the Office of the Information Commissioner during complaint resolution, or occasional human error during data entry. While every effort is made to ensure accuracy, minor discrepancies may occasionally occur.

Access to Information Act

Access informal requests

Requests can be made for records previously released under the ATIA, which are referred to as ‘Access Informal Requests’. Summaries of previously released access to information requests are posted monthly on the [Open Government](#) website where the public can make a request for copies of these records. This forms part of the Government of Canada’s commitment to openness and transparency.

The Public Health Agency of Canada received 778 Access Informal requests and closed 751 in 2024-2025. A total of 41 requests were carried over to the next reporting period.

Access to information requests received and completed

In 2024-2025, a total of 181 access to information requests were received and 268 were completed with 142,349 pages reviewed. More requests were closed than received, reducing the Public Health Agency of Canada’s accumulated inventory of requests.

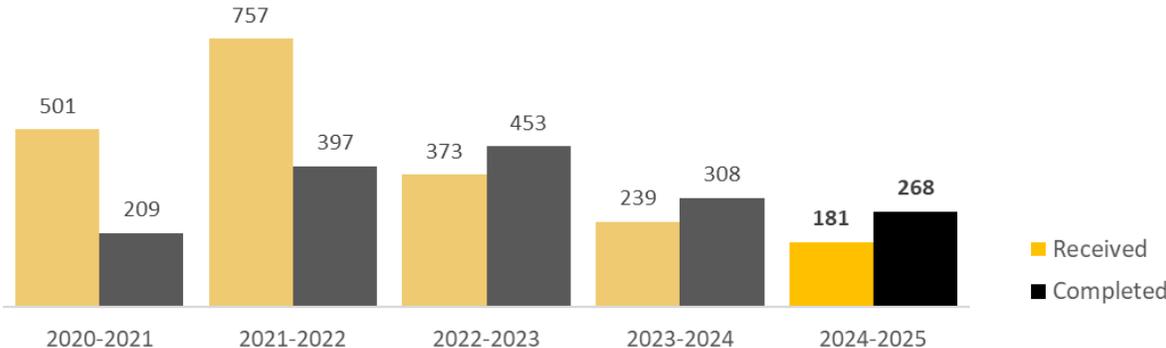


Figure 1: Access to Information requests received and completed each fiscal year from 2020-2021 to 2024-2025

Key statistics by fiscal year

Fiscal year	Number of requests received	Outstanding from previous reporting periods	Total caseload	Number of requests closed	# of pages reviewed for closed files
2020-2021	501	68	569	209	13,595
2021-2022	757	360	1,117	397	41,139
2022-2023	373	719	1,092	453	115,137
2023-2024	239	639	878	308	341,949
2024-2025	181	570	751	268	142,349

Caseload and carry forward and outstanding active access to information requests

In 2024-2025, the Public Health Agency of Canada managed 751 active access to information requests. Of this total, 181 were new requests received in 2024-2025, a decrease from the 239 received in 2023-2024. Of the 751 active access to information requests, 570 were outstanding from previous fiscal years with 120 from 2023-2024 and 450 from earlier periods.

The Public Health Agency of Canada closed 268 access to information requests and carried forward 483 to the 2025-2026 fiscal year. Of the 483 files carried forward, 61 were carried over within legislated timelines while 422 were carried over beyond legislated timelines.

Although more requests were closed than received, a high volume were carried forward. An inventory reduction plan was launched in the Spring of 2024 and focus on closing older files. A target to close 25% of the accumulated inventory received prior to April 1, 2023 (114 files) was set and this goal was surpassed, with 30% of these files being closed. The Public Health Agency of Canada will continue implementing this reduction strategy.

Processing times for access to information requests

In 2024-2025, the Public Health Agency of Canada closed a total of 268 requests. Below is the breakdown of the time taken to process these requests.

- 22 were closed 0 to 15 days within
- 20 were closed within 16 to 30 days
- 23 were closed within 31 to 60 days
- 28 were closed within 61 to 120
- 17 were closed within 121 to 180 days
- 22 were closed within 181 to 365 days
- 136 took more than 365 days

Of the 268 requests that the Public Health Agency of Canada closed in 2024-2025, 63 requests (23.5%) were closed within legislated timelines (30 days plus applicable extension) while 205 (76.5%) were closed past the legislated timelines. Of the 205 requests closed past legislated timelines (including any extensions taken):

- 14 were closed 1 to 15 days past legislated timelines
- 8 were closed 16 to 30 days past legislated timelines
- 12 were closed 31 to 60 days past legislated timelines
- 17 were closed 61 to 120 days past legislated timelines
- 9 were closed 121 to 180 days past legislated timelines
- 16 were closed 181 to 365 days past legislated timelines
- 129 were closed more than 365 days past legislated timelines

Requests are closed past the legislated timelines for a number of reasons:

- 91 were closed past the legislated timelines due to ‘interference with operations/workload’
- 25 were closed past the legislated timelines due to ‘external consultations’
- 3 were closed past the legislated timelines due to ‘internal consultations’
- 86 were closed past the legislated timelines for reasons ‘other’ than those specified above

Requests carried over to the next reporting period by reporting period received

In 2024-2025, 483 requests were carried over to the next reporting period. Below is a table outlining the number of access to information requests carried over to the next reporting period, broken down by the reporting period the request was received, and by whether the request was within legislated timelines.

Requests carried over to the next reporting period by reporting period received

Reporting period requests carried over were received	Requests carried over that are within legislated timelines	Requests carried over that are beyond legislated timelines	Total
Received in 2024-2025	38	65	103
Received in 2023-2024	7	57	64
Received in 2022-2023	1	47	48
Received in 2021-2022	18	202	220
Received in 2020-2021	0	39	39
Received in 2019-2020	0	6	6

Reporting period requests carried over were received	Requests carried over that are within legislated timelines	Requests carried over that are beyond legislated timelines	Total
Received in 2018-2019	0	1	1
Received in 2017-2018	0	1	1
Received in 2016-2017	0	0	0
Received in 2015-2016 or earlier	0	1	1
Total	64	419	483

Source of requests under the Access to Information Act

The Public Health Agency of Canada’s requests mostly came from the public (43%), the media (19%), and businesses (10%). Only a small number of requests came from academia (4%), and organizations (3%). Additionally, 20% declined to identify which category they associate with.

Proportion of requests among sources

Source	Number of Requests	Proportion of Requests*	Change from 2023-2024
Public	78	43%	+9%
Media	35	19%	-9%
Academia	8	4%	-1%
Business (Private Sector)	18	10%	+6%
Organizations (e.g. political party, association, union)	6	3%	+1%
Decline to Identify	36	20%	-6%
Total	181		

*Numbers may not add up to 100% due to rounding.

Extensions

The majority of the extensions invoked under the ATIA, 91 (71%), were due to consultation with other parties such as third parties and other institutions. The remaining 38 extensions (29%) were taken because processing the requests would have interfered with operations due to the large volume of records involved.

Completing consultations with other government organizations and third parties is a necessary step in the process, enabling the Public Health Agency of Canada to release as much information as possible. Over the last several years, the Public Health Agency of Canada has made more information available to the public, continuously reassessing the

balance between its commitment to openness and transparency, with the need to safeguard confidential business information.

Consultations completed from other institutions

In addition to processing its own requests, the Public Health Agency of Canada also completes consultations received from other institutions and organizations.

In 2024-2025, the Public Health Agency of Canada managed 115 consultations from other Government of Canada institutions (100 received in the 2024-2025 fiscal year and 15 received in 2023-2024). The Public Health Agency of Canada also managed 34 requests from other organizations (27 received in the 2024-2025 fiscal year and seven received in 2023-2024).

The Public Health Agency of Canada closed 126 consultations, having reviewed 10,523 pages of records. A total of six consultations were carried over to 2025-2026 within negotiated timelines, while 17 were carried over beyond negotiated timelines. In most cases the Public Health Agency of Canada consented to full disclosure of the records.

Disposition of completed requests

Of the access to information requests completed in 2024-2025, 58% had records that were disclosed in part and 8% were all disclosed. No records existed for 7% of requests while 24% of access to information requests were abandoned. The breakdown of the remaining 'other' completed files is as follows:

- 1.5% request transferred
- 0.37% all exempted
- 0.37% all excluded
- 0.74% neither confirmed nor denied

*Numbers may not add up to 100% due to rounding.

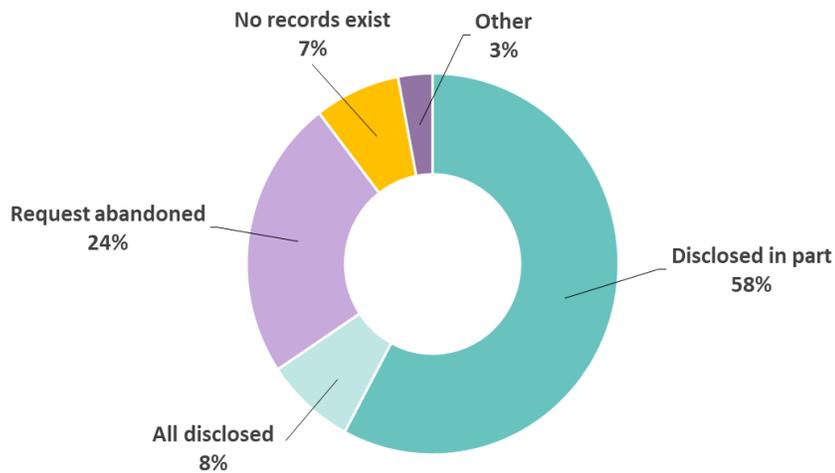


Figure 2: Disposition of completed access to information requests.

Exemptions invoked

Sections 13 to 24 of the ATIA provide specific legislated exemptions intended to protect information from disclosure, while section 26 provides a temporary exemption relating to information that will soon be published. In some instances, records may have multiple exemptions applied to them to appropriately safeguard information.

An exemption was applied for section 19(1) (personal information) 151 times. The application of section 20 (to protect third-party information) in 143 requests required consultations in many cases to ensure that only proprietary and commercially sensitive information was protected. Section 21 (the protection of information related to government operations) was applied to 106 requests.

Exclusions cited

The ATIA does not apply to published material, material available to the public for purchase, or for public reference (section 68), nor does it apply to confidences of the King's Privy Council of Canada (section 69). Records containing proposed exclusions under section 69 require consultation with the Department of Justice, and in some cases, the Privy Council Office.

In 2024-2025, six requests contained exclusions for publicly available material and 41 requests contained exclusions for records pursuant to confidences of the King's Privy Council of Canada.

Translations

One translation was required to respond to a request in 2024-2025.

Format of information released

Of the requests where records were fully or partially disclosed, 147 were released as electronic copies, 10 were released in paper format, and 19 as a data set. The Public Health Agency of Canada releases records in the format preferred by the requestor, while encouraging the use of the Government of Canada’s ATIP Online Request Service platform to receive timely and secure access to the records.

Privacy Act

Informal requests

No informal requests were made in 2024-2025.

Privacy requests receive and completed

In 2024-2025, 31 privacy requests were received and 35 were completed, with 2,945 pages reviewed. More requests were closed than received, reducing the Public Health Agency of Canada’s accumulated inventory of requests.

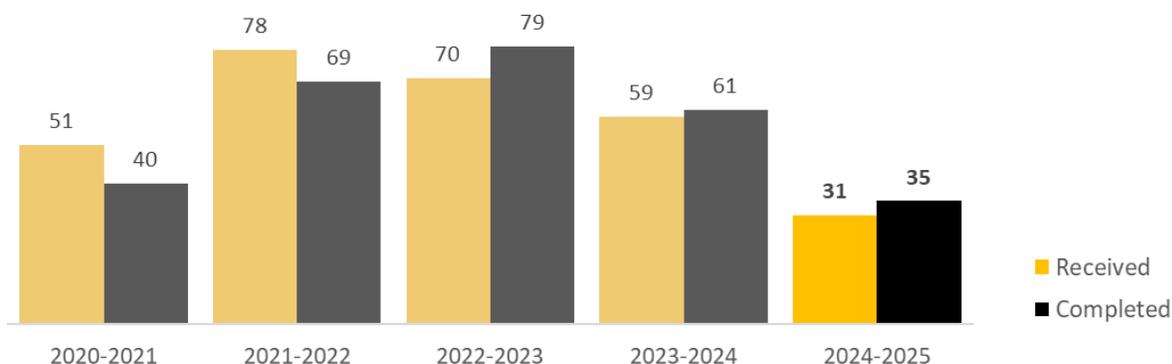


Figure 3: Privacy requests received and completed each fiscal year from 2020-2021 to 2024-2025.

Key statistics by fiscal year

Fiscal year	Number of requests received	Outstanding from previous reporting periods	Total caseload	Number of requests closed	# of pages reviewed for closed files
2020-2021	51	2	53	40	50
2021-2022	78	13	91	69	3,537
2022-2023	70	21	91	79	2,499
2023-2024	59	12	71	61	1,119
2024-2025	31	10	41	35	2,945

Caseload and carry forward of privacy requests

In 2024-2025, the Public Health Agency of Canada managed 41 active privacy requests. Of these, 31 were new privacy requests and 10 were outstanding from previous reporting periods.

A total of 35 privacy requests were closed and six were carried forward to the 2025-2026 fiscal year. Of the six privacy requests carried forward to 2025-2026, two were carried over within legislated timelines while four were carried over beyond legislated timelines.

Requests for personal information under the *Privacy Act* are generally received from current and former Public Health Agency of Canada employees who want to obtain their personal information, and from individuals who have applied for employment at the Public Health Agency of Canada, seeking management's consideration of their applications.

Human Resource services for the Public Health Agency of Canada are delivered by Health Canada, and associated records therefore are legally held by that institution. As a result, requests for personal information relating to Agency employees and staffing processes may be opened by both the Public Health Agency of Canada and Health Canada in order to identify all records to support an individual's right of access.

Processing time for requests

In 2024-2025, the Public Health Agency of Canada closed a total of 35 privacy requests. Below is a breakdown of the time taken to process these requests.

- 18 were closed within 0 to 15 days
- 6 were closed within 16 to 30 days
- 3 were closed within 31 to 60 days
- 2 were closed within 61 to 120 days
- 0 were closed within 121 to 180 days
- 1 was closed within 181 to 365 days
- 5 took more than 365 days

Of the 35 requests that the Public Health Agency of Canada responded to, 25 (71.4%) privacy requests were closed within legislated timelines (30 days plus applicable extension), while 10 (28.6%) were closed beyond legislated timelines.

Of the 10 requests closed past legislated timelines (including any extensions taken):

- 1 was closed within 1 to 15 days
- 1 was closed within 16 to 30 days
- 1 was closed within 31 to 60 days

- 1 was closed within 61 to 120 days
- 0 were closed within 121 to 180 days
- 2 were closed within 181 to 365 days
- 4 took more than 365 days

Requests are closed past the legislated timelines for a number of reasons:

- 8 were closed past the legislated timelines due to ‘interference with operations/ workload’
- 2 were closed past the legislated timelines for reasons ‘other’ than those specified above

In accordance with the Treasury Board of Canada Secretariat’s Directive on Personal Information Requests and Correction of Personal Information, the Public Health Agency of Canada continues to notify requesters in writing of anticipated delays.

Requests carried over to the next reporting period by reporting period received

In 2024-2025, six requests were carried over to the next reporting period. Below is a table outlining the number of privacy requests carried over to the next reporting period, broken down by the reporting period the request was received, and by whether it was within legislated timelines.

Requests carried over to the next reporting period by reporting period received

Reporting period requests carried over were received	Requests carried over that are within legislated timelines	Requests carried over that are beyond legislated timelines	Total
Received in 2024-2025	2	2	4
Received in 2023-2024	0	0	0
Received in 2022-2023	0	0	0
Received in 2021-2022	0	0	0
Received in 2020-2021	0	2	2
Total	2	4	6

Extensions

Two extensions were taken in 2024-2025, due to a large volume of pages. Under the *Privacy Act*, 30 days is the longest extension that can be taken.

Consultations completed from other institutions

The Public Health Agency of Canada received one consultation from another Government of Canada institution. This consultation was closed during the 2024-2025 reporting period.

Disposition of completed requests

Of the privacy requests completed in 2024-2025, 29% had records that were disclosed in part, 57% were abandoned, and no records existed for 14% .

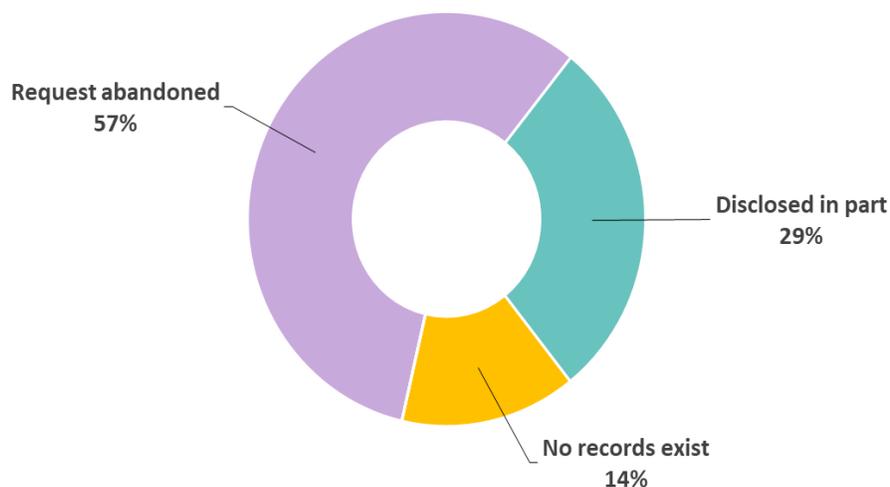


Figure 4: Disposition of completed privacy requests

Exemptions invoked

Of the 14 exemptions applied in response to privacy requests in 2024-2025, 12 were to protect the personal information of individuals other than the requester, and two were to protect solicitor-client privilege.

Exclusions Cited

No exclusions were applied to privacy requests in 2024-2025.

Translations

No translations were required to respond to requests in 2024-2025.

Format of information released

Of the 10 requests where records were disclosed, all were released as electronic copies.

Privacy Management Division workload

In 2024-2025, the Privacy Management Division received a total of 578 requests, including 284 for privacy advisory services from the Public Health Agency of Canada program clients, and 294 requests for policy analysis and reporting. This represents a significant increase in the overall number of requests from the previous year (316).

The Public Health Agency of Canada is committed to properly handling personal information under its control and ensuring that privacy requirements and risks are considered when new initiatives are developed and deployed.

In 2024-2025, the Privacy Management Division supported this commitment by providing advice to program clients on the collection, use, and disclosure of personal information, and by assessing privacy risks for new initiatives, projects, and research activities. As the volume and complexity of files continue to grow—particularly in areas such as artificial intelligence, Open Government publishing, and Cloud services—the Division has conducted increasingly in-depth privacy analyses to address emerging challenges.

Cost for administering the *Access to Information Act*

The Public Health Agency of Canada spent a total of \$3,635,180 on access to information functions in 2024-2025. Of this total, salaries and overtime costs represent \$2,899,697 and goods and services costs were \$735,483. Most of the goods and services costs (\$626,806) were used to retain temporary resources to address larger and more complex requests.

Costs for administering the *Privacy Act*

The Public Health Agency of Canada spent a total of \$1,444,044 on privacy functions in 2024-2025. Of this total, salaries and overtime costs represent \$1,269,980. Temporary resources for privacy services accounted for \$115,426 and other goods and services costs totalled \$58,638.

Training and awareness

An overview of access to information and privacy obligations is included in the New Employee Onboarding E-Module, which is mandatory for all new employees to complete in their first month at the Public Health Agency of Canada. This ensures that all new employees are made aware of their legal obligations, and directs them to additional resources and training to further their learning. Additional information about training and awareness can be found below.

Access to information training

The online ATIP Fundamentals course, offered by the Canada School of Public Service, is mandatory for all staff as a foundation for understanding their legal obligations. A total of 688 Public Health Agency of Canada employees completed this course in 2024-2025.

The Public Health Agency of Canada also offers training specific to the department and its processes. This includes a one-hour course, ATIP for Branch Single Window Contacts, which is offered to all new Single Windows. The facilitated course, Introduction to ATIP Requests at the Public Health Agency of Canada is available to all employees, and was completed by 112 employees in 2024-2025.

Training is promoted at all Single Window working group meetings, at the ATIP Executive Leaders Committee and the Public Health Agency of Canada Executive Committee, through Broadcast News messages, and on the Public Health Agency of Canada's intranet site.

Access to information awareness

In 2024, Canada celebrated Right to Know Week from September 23rd to 29th. The Public Health Agency of Canada kicked off the event with a message from Health Canada's Assistant Deputy Minister of the Corporate Services Branch, highlighting openness and transparency as essential to good governance and democracy, and raising awareness about the public's right to access information held by the government and other public institutions.

During Right to Know Week, the Public Health Agency of Canada promoted the online ATIP courses offered by the Canada School of Public Service and shared resources on how to respond to ATIP requests and manage information.

In 2024-2025, communications were sent to all employees promoting access to information training and emphasizing its importance. Additionally, information was provided to all employees addressing common questions, such as how to conduct record searches and what types of records need to be provided. The goal is to foster a culture of openness and transparency while also promoting the timely provision of high-quality records.

Privacy training

During 2024-2025, the Privacy Management Division delivered several tailored privacy training and awareness sessions to 20 employees across various groups within the Agency.

The Privacy Management Division's online privacy training is available to all Public Health Agency of Canada employees. Approximately, 754 Public Health Agency of Canada employees completed the online training in 2024-2025.

Privacy awareness

The Public Health Agency of Canada commemorated Data Privacy Week with a learning event, organized by the Privacy Management Division, featuring speakers from the Treasury Board of Canada Secretariat and the Office of the Privacy Commissioner of Canada. The speakers shared important insights on key privacy topics such as the privacy considerations when using artificial intelligence, the need for strong safeguards to protect personal information, and the responsibility to report privacy breaches.

To promote privacy responsibilities during Privacy Awareness Week, the Public Health Agency of Canada shared several privacy resources with its employees, such as guidance on when to include privacy notices, how to navigate privacy risk assessments and best practices for protecting personal information in contracts.

Throughout the year, regular communications are sent to all employees on privacy-related matters with the aim of building a culture of strong privacy awareness within the agency.

Policies, guidelines, procedures and initiatives

Betterment Solutions Working Group

The ATIP Operations Division's Betterment Solutions Working Group continued to meet regularly throughout 2024-2025 to foster a culture of innovation by promoting employee-led improvements. At this working group, ATIP Analysts and support staff from a variety of levels identify and prioritize operational issues, in an effort to find and implement solutions. The working group also provides horizontal input in response to policy consultations from Treasury Board Secretariat.

ATIP Operations Division's Professional Development Program

The ATIP Operations Division's Professional Development Program was launched in January 2017. This program allows employees to progress based on performance, without the need for a competitive hiring process. In 2024-2025, 45 analysts were enrolled in the program and 13 advanced in level. The Professional Development Program helps increase ATIP capacity within the Government of Canada.

Indigenous Reconciliation

In February 2024, Treasury Board Secretariat issued an Implementation Notice waiving the \$5 application fee in support of Indigenous Reconciliation. The Public Health Agency of Canada has aligned its process with this direction.

Request processing software solution project

In 2024-2025, Health Canada began the process of acquiring a new access to information and privacy request processing software solution, which will support the Public Health Agency of Canada as well. The new software solution will provide an integrated platform to manage the full life cycle of an access to information or personal information request and will streamline activities, resulting in a more efficient and effective process. Full implementation is expected in 2025-2026.

New case management system

In 2024-2025, the Privacy Management Division advanced the development of a new case management system to manage privacy requests to enhance operational efficiency, as well as to improve data integrity and service delivery. The new system is scheduled to deploy in 2025-2026, and is designed to streamline workflows, improve the user experience, and support better decision-making through automated analytics and reporting capabilities.

New privacy breach management and reporting process

In 2024-2025, the Privacy Management Division implemented a new, streamlined privacy breach management and reporting process. This updated process improves briefing to senior management by providing each branch head with access to an automated, real-time, breach dashboard for the Agency. These reports enable senior leaders to identify and monitor privacy breach trends within their respective branches, which improves informed oversight and decision-making.

Transparency requirements for sharing personal information with third parties

In October 2022, the Treasury Board of Canada Secretariat announced new transparency requirements for federal institutions like the Public Health Agency of Canada when sharing personal information with third parties through written agreements. To meet these requirements, the Public Health Agency of Canada must identify all parties involved in these agreements in InfoSource and publish summaries of the agreements on its Canada.ca Access to Information and Privacy webpage.

The Privacy Management Division is leading a project to meet this new requirement. The Public Health Agency of Canada published summaries of the relevant agreements in June 2025.

Standard on Privacy Impact Assessment

In October 2024, the Treasury Board of Canada Secretariat introduced new requirements affecting Privacy Impact Assessments, Privacy Protocols, and Personal Information Banks. Any program that requires a Personal Information Bank, but does not currently have one

registered, must complete a Privacy Impact Assessment or Privacy Protocol and register a Personal Information Bank by October 10, 2025. The Privacy Management Division led an initiative to identify any programs that require a Personal Information Bank and, is working with program officials to complete a Privacy Impact Assessment or Privacy Protocol where required to bring the Public Health Agency of Canada into compliance.

To support these changes, the Privacy Management Division is also developing new resources, processes and awareness campaigns to ensure employees understand their responsibilities related to privacy assessments.

Concept for artificial intelligence supported Privacy Impact Assessments

In 2024-2025, the Privacy Management Division explored how artificial intelligence could be used to improve the efficiency, consistency, and quality of Privacy Impact Assessments. The goal was to reduce manual effort, support early identification of privacy risks, and enhance the timeliness of privacy compliance activities. In 2025-2026, the Privacy Management Division will continue advancing this initiative to manage the growing volume and complexity of Privacy Impact Assessment while maintaining compliance and accountability.

Summary of key issues and actions taken on complaints and audits

Complaints management

Individuals and organizations who believe federal institutions have not respected their rights under the ATIA may ask the Office of the Information Commissioner to investigate within 60 days of receiving a response from a federal institution or if they have not received a response within the legislated timeline.

Individuals and organizations who think their personal information has been mishandled have the right to file a complaint to the Privacy Commissioner of Canada.

Complaints to the Information Commissioner of Canada

In 2024–2025, 21 complaints under the ATIA were filed with the Office of the Information Commissioner for the Public Health Agency of Canada's requests. The Public Health Agency of Canada received 14 final reports from the Office of the Information Commissioner with eight containing an order. Seven of the 21 complaints, resulted in the Information Commissioner either refusing or ceasing to investigate the complaints under section 30(5) of the ATIA.

Areas of complaint were primarily due to exemptions applied to the records and time extensions taken.

The Public Health Agency of Canada cooperates with the Office of the Information Commissioner during investigations by providing details on the way a file was or is being processed, providing evidence of the search that was undertaken, explaining key considerations in applying exemptions, conducting new searches, providing rationales, disclosing additional records etc. The Agency reviews the outcomes of the investigations conducted by the Office of the Information Commissioner, follows up on recommendations or orders, and where appropriate, incorporates lessons learned into business processes.

Outstanding number of access to information complaints

There are 23 open complaints with the Information Commissioner of Canada. The following table lists the number of open complaints with the Information Commissioner of Canada by year.

Number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods

Fiscal year open complaints were received by the Public Health Agency of Canada	Number of open complaints
Received in 2024-2025	18
Received in 2023-2024	2
Received in 2022-2023	1
Received in 2021-2022	1
Received in 2020-2021	1
Total	23

The Public Health Agency of Canada actively communicates and collaborates with the Office of the Information Commissioner to ensure the effective handling and resolution of complaints.

Complaints to the Privacy Commissioner of Canada

In 2024-2025, the Public Health Agency of Canada received two complaints under the *Privacy Act*. One of the complaints was related to the unauthorized disclosure of personal information and was resolved using the Office of the Privacy Commissioner of Canada’s early resolution process. The second complaint was related to a delay in processing a personal information request.

The Public Health Agency of Canada provided zero representations to the Office of the Privacy Commissioner of Canada under Section 33 of the *Privacy Act*. One letter of finding was received under Section 35, relating to complaints received in previous years.

The Public Health Agency of Canada cooperates with the Office of the Privacy Commissioner during investigations by providing details on the way a file was or is being processed, conducting new searches, providing rationales, etc. The Public Health Agency of Canada reviews the outcomes of the investigations, and where appropriate, incorporates lessons learned into business processes.

Outstanding number of privacy complaints

There are two open complaints with the Privacy Commissioner of Canada. The following table lists the number of open complaints with the Privacy Commissioner of Canada by year.

Number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods

Fiscal year open complaints were received by the Public Health Agency of Canada	Number of open complaints
Received in 2024-2025	1
Received in 2023-2024	0
Received in 2022-2023	1
Total	2

The Public Health Agency of Canada communicates and collaborates with the Office of the Privacy Commissioner to ensure the effective handling and resolution of complaints.

Federal Court Cases

Applications & appeals submitted to the Federal Court

Access to Information Act

No applications or appeals were made to the Federal Court or the Federal Court of Appeal during the 2024–2025 fiscal year.

Privacy Act

No applications or appeals were made to the Federal Court during the 2024-2025 fiscal year.

Monitoring Compliance

ATIP Operations Division generates weekly, monthly and semi-annual reports to senior management in order to monitor performance within the Public Health Agency of Canada. These reports outline the incoming volume of requests, the number of closed requests, and

the timelines of the retrieval of records. Additionally, the ATIP Operations Division encourages branches to identify common request types and explore alternative methods for disclosing such information.

The Privacy Management Division produces monthly reports to senior management on privacy breaches. The Privacy Management Division supports compliance by periodically reviewing its privacy policies, procedures and practices.

The Privacy Management Division assists programs with ensuring that all information sharing agreements, information sharing arrangements, and contracts involving personal information include the appropriate privacy protections and respect the requirements of the Directive on Privacy Practices, including embedding the right of access. This includes reviewing draft agreements, providing departmental guidance, and making available to the public summaries of agreements involving personal information disclosures by the Public Health Agency of Canada.

The Public Health Agency of Canada has embedded standard requirements to support the right of access to information in contracts, information sharing agreements and information sharing arrangements.

Other Reporting Requirements Specific to the *Privacy Act*

Material privacy breaches

During 2024-2025, the Public Health Agency of Canada reported no material privacy breaches to the Office of the Privacy Commissioner and the Treasury Board Secretariat.

Privacy Impact Assessments

During 2024-2025, no Privacy Impact Assessments were completed. Information about the Public Health Agency of Canada's Privacy Impact Assessments is found on the Agency's [PIA website](#).

Public interest disclosures

During 2024-2025, there were no disclosures made under section 8(2)(m) of the *Privacy Act* and no section 8(5) written notifications were provided to the Office of the Privacy Commissioner.

Appendix A: Access to Information Act and Privacy Act – Delegation Order

Delegation Order

L'ordonnance de délégation de pouvoirs

Access to Information Act and Privacy Act

Loi sur l'accès à l'information et Loi sur la protection des renseignements personnels

I, the Minister of Health, pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby delegate the persons holding the positions set out in the Delegation of Authority Schedule attached hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as head of the Public Health Agency of Canada, under the provisions of the Act and related regulations set out in the schedule opposite each position. This delegation supersedes all previous delegation orders.

En ma qualité de ministre de la Santé et en vertu de l'article 95 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, je délègue par la présente aux titulaires des postes énoncés à l'annexe de délégation de pouvoirs ci-après, ou aux personnes occupant les dits postes à titre intérimaire, les attributions dont je suis investie, à titre de ministre de l'Agence de la santé publique du Canada, aux termes des dispositions des lois et des règlements connexes mentionnés en regard de chaque poste. Le présent document remplace toute ordonnance de délégation de pouvoirs antérieure.



Minister of Health
Ministre de la Santé

MAY 24 2023

Date

Delegation of Authority Schedule

Access to Information Act - Part 1 and 3

Full Delegation

Provision	Description	President	ADM CSB	DG PPMS D	Executive Dir, ATIP Ops Dir, ATIP Ops
	All powers, duties and functions under the <i>Access to Information Act</i> , R.S.C. 1985, c. A-1 (prior to and following June 21, 2019) and related regulations (prior to and following June 21, 2019)	Full authority			

Partial Delegation

Provision	Description	Dir, PMD	Deputy Dir / Manager, ATIP Ops	Team Leader/ Senior Advisor	Senior Analyst	Analyst
4(2.1)	Responsibility of government institutions	No	Yes	Yes	Yes	Yes
6.1(1)	Reasons for declining to act on request	No	Yes	No	No	No
6.1(1.3), (1.4), (2)	Notice – suspension, end of suspension	No	Yes	Yes	Yes	No
7	Notice when access requested	No	Yes	Yes	Yes	Yes
8(1)	Transfer of request	No	Yes	Yes	No	No
9(1)	Extension of time limits	No	Yes	Yes	No	No
9(2)	Notice of extension to Information Commissioner	No	Yes	Yes	Yes	Yes
10	Where access is refused	No	Yes	Yes	No	No
11(2)	Application Fee Waiver	No	Yes	Yes	No	No
12(2)(b)	Language of access	No	Yes	Yes	No	No
12(3)(b)	Access to record in alternative format	No	Yes	Yes	No	No
Exemption Provisions of the <i>Access to Information Act</i>						
13	Information obtained in confidence	No	Yes	No	No	No
14	Federal-provincial affairs	No	Yes	No	No	No
15	International affairs and defence	No	Yes	No	No	No
16	Law enforcement and investigations	No	Yes	Yes	No	No
16.5	<i>Public Servants Disclosure Protection Act</i>	No	Yes	No	No	No
17	Safety of individuals	No	Yes	No	No	No
18	Economic interests of Canada	No	Yes	No	No	No
18.1	Economic interest of certain government institutions	No	Yes	No	No	No
19	Personal information	No	Yes	Yes	No	No
20	Third-party information	No	Yes	Yes	No	No
21	Advice, etc.	No	Yes	No	No	No
22	Testing procedures, tests and audits	No	Yes	No	No	No
22.1	Internal Audits	No	Yes	No	No	No
23	Protected information – solicitors, advocates and notaries	No	Yes	Yes	No	No
23.1	Protected information – patents and trade-marks	No	Yes	Yes	No	No
24	Statutory prohibitions against disclosure	No	Yes	Yes	No	No
Other Provisions of the <i>Access to Information Act</i>						
25	Severability	No	Yes	Yes	No	No
26	Refusal of access if information to be published	No	Yes	No	No	No
27(1), (4)	Notice to third parties	No	Yes	Yes	Yes	No
28(1)(b),	Representations of third-party and decision	No	Yes	Yes	No	No
33	Notice to Information Commissioner of notices to third parties	No	Yes	Yes	Yes	No

Provision	Description	Dir, PMD	Deputy Dir / Manager, ATIP Ops	Team Leader/ Senior Advisor	Senior Analyst	Analyst
35(2)(b)	Right to make representations	No	No	No	No	No
37(1)(c)	Notice of actions to implement recommendations of	No	No	No	No	No
37(4)	Access to be given to complainant	No	Yes	No	No	No
41(2)	Review by Federal Court – government institution	No	No	No	No	No
43(2)	Service or notice of application to Federal Court for review	No	Yes	Yes	No	No
44(2)	Notice to person who requested record	No	Yes	Yes	No	No
52(2)(b), 52(3)	Special rules for hearings	No	No	No	No	No
94	Annual report – government institutions	No	No	No	No	No
96(3)	Notice of Provision of services related to access to information	No	No	No	No	No
96(5)	Spending authority	No	No	No	No	No
Access to Information Regulations						
6(1)	Transfer of request	No	Yes	No	No	No
8	Method of access	No	Yes	No	No	No
8.1	Limitations in respect of format	No	Yes	No	No	No

Privacy Act

Full Delegation

Description	President	ADM CSB	DG PPMSD
All powers, duties and functions under the Act and Regulations	Full authority		

Full Delegation with Exceptions

Description	Executive Dir, ATIP Ops Dir, ATIP Ops	Dir, PMD
All powers, duties and functions under the Act and Regulations, with noted exceptions	Full authority except Sections 8(2)(j), 8(2)(m), 8(5), 9(1), 9(4), 10	Full authority except Sections 14-28 inclusively

Partial Delegation

Provision	Description	Deputy Dir / Manager ATIP Ops	Team Leader/ Senior Advisor	Senior Analyst	Analyst
8(2)(j)	Disclosure for research or statistical purposes	No	No	No	No
8(2)(m)	Disclosure in the public interest or in the interest of the	No	No	No	No
8(4)	Copies of requests under paragraph 8(2)(e)	No	No	No	No
8(5)	Notice of disclosure under paragraph 8(2)(m)	No	No	No	No
9(1)	Record of disclosures to be retained	No	No	No	No

Provision	Description	Deputy Dir / Manager ATIP Ops	Team Leader/ Senior Advisor	Senior Analyst	Analyst
9(4)	Consistent uses	No	No	No	No
10	Personal information to be included in personal information	No	No	No	No
14(a)	Notice where access requested	Yes	Yes	Yes	No
14(b)	Giving access to the record	Yes	Yes	No	No
15	Extension of time limits	Yes	Yes	Yes	No
16	Where access is refused	Yes	Yes	No	No
17(2)(b)	Language of access	Yes	Yes	No	No
17(3)(b)	Access in an alternative format	Yes	Yes	No	No
18(2)	Exempt banks	Yes	No	No	No
19	Information obtained in confidence	Yes	No	No	No
20	Federal-provincial affairs	Yes	No	No	No
21	International affairs and defence	Yes	No	No	No
22	Law enforcement and investigations	Yes	No	No	No
22.3	<i>Public Servants Disclosure Protection Act</i>	Yes	No	No	No
23	Security clearances	Yes	No	No	No
24	Individuals sentenced for an offence	Yes	No	No	No
25	Safety of individuals	Yes	No	No	No
26	Information about another individual	Yes	Yes	No	No
27	Protected information – solicitors, advocates and notaries	Yes	Yes	No	No
27.1	Protected information – patents and trade-marks	Yes	Yes	No	No
28	Medical records	Yes	No	No	No
33(2)	Right to make representations	No	No	No	No
35(1)(b)	Notice of actions to implement recommendations of	Yes	No	No	No
35(4)	Access to be given to complainant	Yes	No	No	No
36(3)(b)	Notice of actions to implement recommendations of	Yes	No	No	No
51(2)(b),(3)	Special rules for hearings	No	No	No	No
72	Annual report to Parliament	No	No	No	No
73.1(3)	Notice of Provision of services related to privacy	No	No	No	No
73.1(5)	Spending authority	No	No	No	No
Privacy Regulations					
7	Retention of personal information requested under	No	No	No	No
9	Examination of information	Yes	Yes	Yes	Yes
11(2),11(4)	Notification concerning corrections	Yes	Yes	Yes	Yes
13(1)	Disclosure of personal information relating to physical or	Yes	Yes	No	No
14	Examination in presence of medical practitioner or	Yes	Yes	No	No

Legend

Yes	Delegated
No	No Delegation