Office of the Intelligence Commissioner

Bureau du commissaire au renseignement

Annual Report on the *Privacy Act*

2024–25

Canada

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1. Introduction

The *Privacy Act*
The *Privacy Act* (Act) protects the privacy of individuals with respect to their personal information held by a government institution. It establishes the rules for the collection, use, disclosure, retention and disposal of such information. It also provides individuals with a right to be given access to, and to request a correction of, their personal information.

The Government of Canada is committed to protecting the privacy of individuals with respect to personal information that is under the control of government institutions. The government recognizes that this protection is an essential element in maintaining public trust.

Individuals who are not satisfied with how an institution has processed their request under the Act, may submit a complaint to the Office of the Privacy Commissioner of Canada.

The Annual Report is prepared and tabled in Parliament in accordance with section 72 of the Act. The report describes how the Office of the Intelligence Commissioner (ICO) administered and fulfilled its obligations under the Act between April 1, 2024, and March 31, 2025.

Mandate of the Office of the Intelligence Commissioner
The ICO is an independent quasi-judicial agency of the Government of Canada. The ICO supports the fulfillment of the Intelligence Commissioner's (IC) oversight mandate as set out in the *Intelligence Commissioner Act*. The IC approves – or does not approve – certain national security and intelligence activities planned by the Communications Security Establishment and the Canadian Security Intelligence Service and authorized by their respective ministers.

The ICO is committed to the principles of accountability and transparency, which are vital to ensuring trust and confidence in Government of Canada institutions that carry out national security or intelligence activities. To that end, in March of each year, the IC submits to the Prime Minister an annual report outlining the activities of the previous calendar year. Once tabled in Parliament, the ICO publishes the annual report on its website. The ICO also proactively publishes redacted versions of the IC's decisions on its website.

2. Organizational Structure

The ICO is a separate agency consisting of 8.5 planned full-time equivalents.

The Executive Director has delegated authority to oversee the administration of the Act and the *Access to Information Act* within the ICO and ensure compliance with the legislation. The ICO does not have dedicated Access to Information and Privacy (ATIP) officers nor regional ATIP staff. The Manager, Corporate Services is responsible for the coordination and implementation of policies, guidelines and procedures to ensure compliance with the Act and the *Access to Information Act*.

The ICO did not hire any consultants to work on responsibilities related to the Act and was not party to any new or pre-existing service agreements under section 73.1 of the Act during this reporting period.

3. Delegation Order

Subsection 73(1) of the Act gives the IC the authority to delegate one or more officers or employees of the ICO to exercise or perform all, or part, of the IC's powers, duties, and functions under the Act.

The IC as head of the ICO under the provisions of the Act and its regulations, granted full authority to the Executive Director. The signed Delegation Order is included in Appendix A – *Access to Information Act* and *Privacy Act* Delegation Order.

4. Performance 2024–25

During the reporting period, the ICO received 11 privacy requests.

100% of requests were responded to within legislated timelines and all were completed in under 30 days. No records existed for 100% of the requests. The ICO did not receive any complaints under the Act. There were no active requests or active complaints on the last day of the reporting period.

The ICO did not receive any consultations from other Government of Canada institutions during the reporting period.

The ICO Statistical Report as well as the Supplemental Report for 2024–25 are included in Appendices B and C of this report.

5. Training and Awareness

The ICO is committed to promoting awareness and providing ongoing training opportunities to all employees. Training is based on the needs and knowledge base of each employee.

During this reporting period, ICO personnel participated in awareness sessions concerning their responsibilities related to access to information and privacy.

6. Policies, Guidelines, and Procedures

The ICO continued to enhance departmental policies and procedures in the application of the Act. The ICO refined its procedures for processing requests and tracking system to ensure more effective request management and documentation.

7. Initiatives and Projects to Improve Privacy

Throughout the reporting period the ICO worked on a variety of projects to improve privacy, including the publication of redacted versions of the IC's decisions on the ICO website. The IC's decisions are written in a manner that provides Canadians with as much information as possible about the privacy rights and interests at play when the IC considers to approve – or not approve – a ministerial authorization. The ICO was successful in publishing redacted versions of all IC decisions rendered in 2024 prior to the tabling of the 2024 Annual Report of the IC.

8. Summary of Key Issues and Actions Taken on Complaints

No complaints were received nor concluded during the reporting period.

9. Material Privacy Breaches

There were no material privacy breaches reported to the Office of the Privacy Commissioner and to Treasury Board of Canada Secretariat (Information and Privacy Policy Division) during the reporting period.

10. Privacy Impact Assessments

No privacy impact assessments were completed during the reporting period.

11. Public Interest Disclosures

No disclosures were made under paragraph 8(2)(m) of the Act during the reporting period.

12. Monitoring Compliance

The ICO utilizes a manual monitoring system. The monitoring system keeps track of request and consultation timelines and provides reminders of approaching deadlines.

Requests are monitored by the Manager, Corporate Services on an ongoing basis. The Manager, Corporate Services also monitors the time taken to process requests. The Executive Director is informed of the status of requests on a regular basis.

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

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Bureau du commissaire au renseignement

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

The Intelligence Commissioner, pursuant to subsection 95(1) of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedules (I, II and III) hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Intelligence Commissioner as the head of Office of the Intelligence Commissioner, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

Schedule I

Position	***Access to Information Act* and Regulations**	***Privacy Act* and Regulations**
Executive Director	Full authority for all provisions	Full authority for all provisions

Dated, at the City of Ottawa, this 31 day of October, 2019

The Honourable Jean-Pierre Plouffe
Intelligence Commissioner

Canada

Appendix B – Statistical Report on the *Privacy Act*

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Office of the Intelligence Commissioner

Reporting period: 2024-04-01 to 2025-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		11
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		**11**
Closed during reporting period		11
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	8
E-mail	1
Mail	2
In person	0
Phone	0
Fax	0
Total	**11**

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 Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							
	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	9	2	0	0	0	0	0	**11**
Request abandoned	0	0	0	0	0	0	0	**0**
denied	0	0	0	0	0	0	0	**0**
Total	**9**	**2**	**0**	**0**	**0**	**0**	**0**	**11**

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

3.5 Complexity

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

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

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	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
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 audio formats

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

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

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

3.5.5 Relevant minutes processed and disclosed for video formats

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

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

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
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	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	11
Percentage of requests closed within legislated timelines (%)	100

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	Interference with operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

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

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

6.2 Length of extensions

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

Recommendation	Number of Days Required to Complete Consultation 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
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

Recommendation	Number of days required to complete consultation 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
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

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

8.2 Requests with Privy Council Office

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

10.2 Institution-specific and Central Personal Information Banks

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

Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries		$3,442
Overtime		$0
Goods and Services		$0
• Professional services contracts	$0	
• Other	$0	
Total		**$3,442**

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.030
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	**0.030**

Note: Enter values to three decimal places.

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

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

Name of institution: Office of the Intelligence Commissioner

Reporting period: 2024-04-01 to 2025-03-31

Section 1: Requests Carried Over and Active Complaints Under the *Access to Information Act*

1.1 Requests carried over to next reporting period, broken down by reporting period received

Reporting Period Requests Carried Over Were Received	Requests Carried Over that are *Within* Legislated Timelines as of March 31, 2025	Requests Carried Over that are *Beyond* Legislated Timelines as of March 31, 2025	Total
Received in 2024-25	0	0	**0**
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 or earlier	0	0	**0**
Total	**0**	**0**	**0**

1.2 Active complaints with the Information Commissioner of Canada, broken down by reporting period received

Reporting Period Active Complaints Were Received by Institution	Number of Active Complaints
Received in 2024-25	0
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 or earlier	0
Total	**0**

Section 2: Requests Carried Over and Active Complaints Under the *Privacy Act*

2.1 Requests carried over to next reporting period, broken down by reporting period received

Reporting Period Requests Carried Over Were Received	Requests Carried Over that are *Within* Legislated Timelines as of March 31, 2025	Requests Carried Over that are *Beyond* Legislated Timelines as of March 31, 2025	Total
Received in 2024-25	0	0	**0**
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 or earlier	0	0	**0**
Total	**0**	**0**	**0**

2.2 Active complaints with the Privacy Commissioner of Canada, broken down by reporting period received

Reporting Period Active Complaints Were Received by Institution	Number of Active Complaints
Received in 2024-25	0
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 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 2024-25?	No

Section 4: Universal Access under the Privacy Act

How many requests were received from foreign nationals outside of Canada in 2024-25?	0

Canada