



FINTRAC

2024-25 Annual Report on the Administration of the *Access to Information Act*



September 1, 2025



Safe Canadians,
Secure Economy

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1. Introduction

This Report to Parliament, which is prepared and tabled in accordance with Section 94 of the *Access to Information Act*, describes the activities of the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) in administering this Act during fiscal year 2024–25. This report should be considered along with FINTRAC’s 2024–25 *Annual Report on the Administration of the Privacy Act*, which is tabled separately.

The purpose of the *Access to Information Act* (hereafter the “Act”) is to provide a right of access to information held by government institutions. It does so in accordance with three principles: information should be available to the public; necessary exceptions to the right of access should be limited and specific; and decisions on the disclosure of government information should be reviewed independently of government.

2. About FINTRAC

FINTRAC is Canada’s financial intelligence unit and anti-money laundering and anti-terrorist financing supervisor and plays a critical role in combatting money laundering, terrorist activity financing, sanctions evasion and threats to the security of Canada. The Centre has two core responsibilities framed around a duty to protect the personal information with which it is entrusted.

First, FINTRAC is responsible for ensuring compliance with Part 1 and 1.1 of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and its associated Regulations. This legal framework establishes obligations for specified businesses to develop a compliance regime in order to identify clients, monitor business relationships, keep records, and report certain types of financial transactions to FINTRAC. These obligations allow for certain economic activities to be more transparent, which helps prevent and deter nefarious individuals and organizations from using Canada’s legitimate economy to launder the proceeds of their crimes, finance terrorist activities and/or evade sanctions. FINTRAC is committed to working with businesses to help them understand and comply with their obligations. The Centre also takes firm action when it is required to ensure that businesses take their responsibilities seriously. This includes undertaking compliance enforcement action such as follow-up examinations, the development and monitoring of action plans imposed on businesses, the levying of administrative monetary penalties, and the provision of non-compliance disclosures to law enforcement. The Centre also maintains a registry of Canadian-based money services businesses and foreign money services businesses that direct and provide services to persons and entities in Canada.

Second, FINTRAC generates actionable financial intelligence that assists Canada's law enforcement, national security agencies, and international partners in combatting money laundering, terrorism financing, sanctions evasion and threats to the security of Canada. In addition, the Centre produces strategic financial intelligence for federal policy and decision-makers, the security and intelligence community, businesses across the country, international partners, and other stakeholders. FINTRAC's strategic intelligence provides a wide analytic

perspective on the nature, scope, and threat posed by money laundering, terrorism financing and sanctions evasion.

3. The Access to Information and Privacy Office

FINTRAC's Access to Information and Privacy (ATIP) Office is responsible for leading, coordinating, and undertaking the Centre's access to information and privacy responsibilities. The ATIP Office is part of FINTRAC's Communications Group and led by the Executive Communications Lead, who reports directly to FINTRAC's Director and Chief Executive Officer. The Executive Communications Lead, who is also the Centre's Chief Privacy Officer, is responsible for the overall management of all access to information and privacy matters within FINTRAC.

FINTRAC's ATIP Office consists of an ATIP Coordinator and two Senior ATIP Advisors. Key responsibilities of the ATIP Office include:

- developing and implementing policies, procedures, and guidelines to ensure FINTRAC's compliance with the Act and the *Privacy Act*;
- ensuring the timely processing of access to information and privacy requests, and meeting proactive disclosure obligations;
- providing advice, guidance, and awareness activities to FINTRAC employees, contractors, and students on ATIP-related matters;
- representing FINTRAC in its discussions and negotiations with external stakeholders, including other government departments, third parties, the Treasury Board of Canada Secretariat, the Office of the Information Commissioner, the Office of the Privacy Commissioner and the general public;
- maintaining Personal Information Banks and conducting privacy impact assessments; and
- preparing annual reports on the administration of the Act and the *Privacy Act* to Parliament and publishing FINTRAC's Info Source Chapter.

To support the ATIP Office in meeting its legislative obligations, FINTRAC has established a collaborative network comprised of representatives from all sectors and relevant units within the Centre. These representatives are responsible for coordinating requests, providing guidance on the Act within their work units, and liaising with the ATIP Office on all ATIP-related matters. For a breakdown of the units responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see section 9, "Proactive publication".

FINTRAC is not party to any service agreements under section 96 of the Act.

4. Delegation of authority

Order in Council P.C. 2000-1066 designates the Director and Chief Executive Officer of the Centre as head of FINTRAC for the purposes of administering the Act and FINTRAC's privacy program.

Pursuant to Section 73 of the Act, FINTRAC’s Director and Chief Executive Officer delegated the authority to exercise the powers, functions and duties under the Act to FINTRAC’s Executive Communications Lead and its ATIP Coordinator. These functions have full-delegated authority under the Act and the *Privacy Act*, in accordance with the delegation of authority instrument approved by the Director and Chief Executive Officer in March 2023.

A copy of the Director and Chief Executive Officer’s Delegation Order in place during 2023–24 is in Annex A.

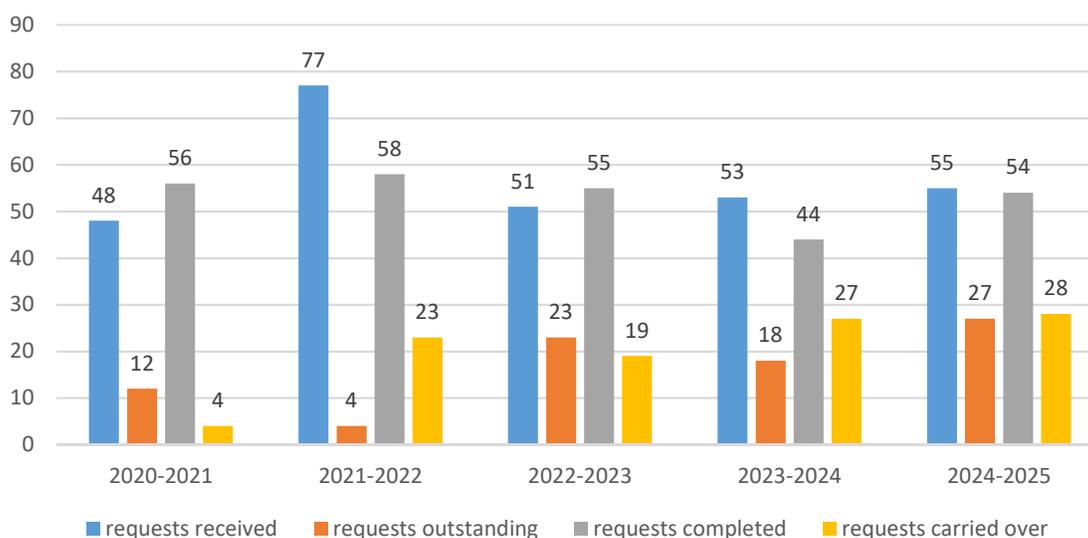
5. Statistical overview and accomplishments

Performance of access request case activity

During the reporting period of April 1, 2024 to March 31, 2025, there was a 4% increase in the number of access requests received by FINTRAC (55) as compared to the previous year (53). FINTRAC also managed 27 requests that were outstanding from a previous fiscal year, bringing the total caseload to 82. Of these, FINTRAC closed 54 requests in 2024–25:

- 9 requests were completed in 1-15 days
- 23 requests were completed in 16-30 days
- 9 requests were completed in 31-60 days
- 5 requests were completed in 61-120 days
- 2 requests were completed in 121-180 days
- 5 requests were completed in 181-365 days
- 1 request was completed in more than 365 days

Number of access to information requests



Of the 82 requests active during 2024–25, 28 were carried over to 2025–26. Of those, 16 were carried over within the legislated timeline. Of the remaining 12 that were carried over beyond legislated timelines, 1 request was received in 2024–25 and 11 were carried over from previous fiscal years and are delayed due to unfinished consultations with other government institutions.

In 2024–25, FINTRAC’s on-time response rate decreased to 87% from 91% in the previous reporting year. The Centre’s on-time response rate is once again above the federal government’s overall average response rate of 70% in 2023–24. FINTRAC’s response to many requests required the intensive review of complex records, including extensive internal and external consultations. FINTRAC observed a significant increase in requests involving large numbers of pages to review, which was the primary cause of the Centre not meeting the statutory deadline on some requests.

Disposition of completed access requests

FINTRAC completed 54 access to information requests in 2024–25:

- In 1 case, representing 2% of the overall cases, the applicant received full disclosure of the information requested (2 pages).
- In 21 cases, representing 39% of the overall cases, the applicants received a partial disclosure of the information requested (a combined 3,544 pages).
- In 1 case, representing 2% of the overall cases, the applicant received a response that the information requested was fully withheld from disclosure.
- In 12 cases, representing 22% of the overall cases, it was determined that no responsive records existed.
- In 9 cases, representing 17% of the overall cases, FINTRAC responded that it was unable to acknowledge the existence of information.
- In 10 cases, representing 18% of the overall cases, the applicants abandoned their requests.

Completion times and extensions of access requests

The Act allows extensions beyond the 30-day statutory period for specific reasons. Of the 54 completed requests during the reporting period, 47 were finalized within the established deadline (the 30-day statutory or an extended deadline pursuant to Section 9 of the Act). Due to delays resulting from internal and/or external consultations, as well as operational pressures, 7 requests were completed after their established deadline.

In 2024–25, FINTRAC required an extension to the original 30-day statutory deadline in 14 instances. The following is a breakdown of these cases:

- Paragraph 9(1)(a) was invoked 3 times to overcome workload pressures and operational constraints.
- Paragraph 9(1)(b) was invoked 3 times in order to complete consultations with other government institutions.
- Paragraph 9(1)(a) and (b) were invoked 8 times in order to overcome workload pressures and to complete consultations with other government institutions.

Consultations under the Act

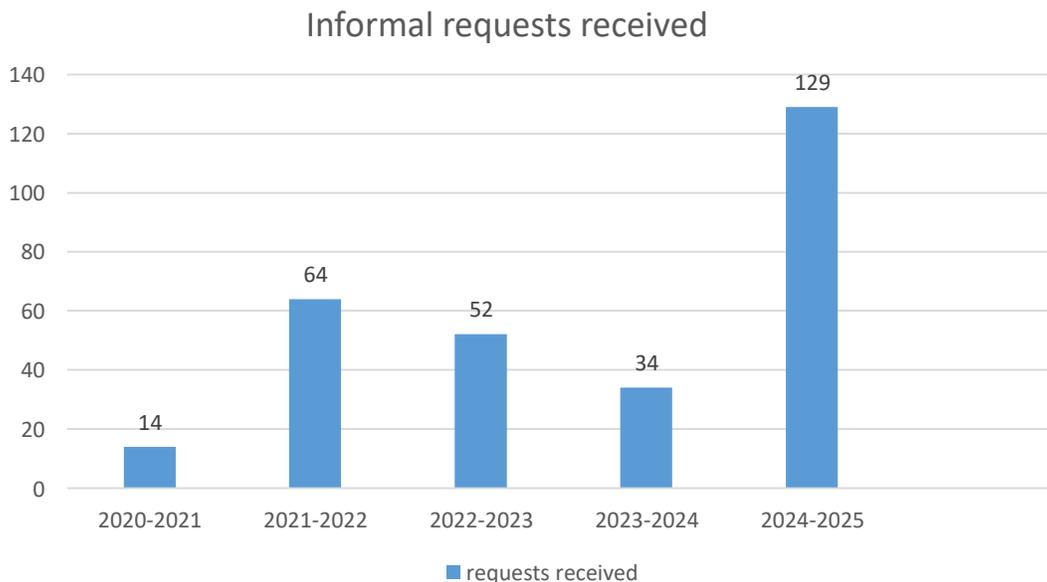
Consultations undertaken between institutions are an essential part of processing requests under the Act. They afford institutions that have an interest in the records proposed for disclosure with an opportunity to make recommendations to the processing institution. For this reporting period, FINTRAC completed 30 consultation requests received from other Government of Canada institutions.

Complaints and investigations of access requests

Subsection 30(1) of the Act describes how the Office of the Information Commissioner receives and investigates complaints from individuals regarding the processing of requests under the Act. At the close of 2024–25, FINTRAC continued to manage 15 complaints under the Act. Of those complaints, 14 were received within the reporting period; 1 was received in reporting period 2022–23. Of the 15 active complaints, the majority are in respect to information FINTRAC withheld from release under the Act. Other complaint issues concerned extensions undertaken, delays in responses, and search and retrieval practices. FINTRAC worked closely with the Office of the Information Commissioner, provided representations in a timely manner, and resolved 8 complaints, the majority of which were discontinued or not well-founded.

Informal requests

In 2024–25, FINTRAC received 129 informal requests for copies of records released in previously processed requests, all of which were responded to within the reporting year. The following chart shows the number of informal requests received by FINTRAC over the past five years.



6. ATIP awareness and education

Information protection is integral to FINTRAC’s mandate. As such, the Centre requires its employees (including students and contractors) to have a heightened awareness of security, privacy, information management and access to information. The FINTRAC *Code of Conduct, Values and Ethics* specifically describes employees’ legal obligations to protect information under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and makes reference to the *Privacy Act*, the *Canadian Charter of Rights and Freedoms*, the *Access to Information Act*, and the Centre’s privacy, security and information management policies. Adherence to the *Code of Conduct, Values and Ethics* is a condition of employment for every FINTRAC employee.

The following training and awareness activities took place during the reporting period:

- The ATIP Office published monthly information notices regarding access to information and privacy protection on FINTRAC’s intranet site.
- The ATIP Office raised awareness by providing day-to-day coaching and targeted information sessions to ATIP representatives across the Centre. In 2024–25, 6 one-on-one training sessions were delivered. This focused training fosters a spirit of collaboration and has been essential to the success of FINTRAC’s broader ATIP program.
- The ATIP Office provides training and awareness sessions to employees tailored to the needs of specific operational groups. The ATIP Office delivered an awareness session to 10 employees during the 2024–25 period.
- FINTRAC employees completed the following online learning courses at the Canada School of Public Service:
 - Access to Information and Privacy Fundamentals (106 employees)
 - Access to Information in the Government of Canada (2 employees)
 - Privacy in the Government of Canada (1 employee)

Access to information and privacy protection messaging is also incorporated in mandatory Information Management awareness sessions and in New Employee Orientation Training.

7. New access to information-related policies and procedures

None to report.

8. Access to information program performance and monitoring

FINTRAC’s automated case management system facilitates timely responses to requests, documents important actions and decisions, and monitors performance. The system also includes

an audit log, has extensive search capabilities to enable analysis of previously processed information, and generates progress and statistical reports. FINTRAC uses the centralized platform ATIP Online Management Tool to receive requests under the Act and communicate with applicants.

FINTRAC is committed to transparency and to helping requesters gain access to readily available information whenever possible. The ATIP Office works closely with sector representatives on all aspects of requests, including ensuring that it is appropriately consulting with FINTRAC partners on information that may affect them if disclosed to the public.

The ATIP Office works with its operational colleagues to assess the implications of making more information available on the Open Government website, and how it can best accommodate frequent recurring requests for specific information. Of note, FINTRAC regularly receives and responds to requests for specific statistical details from its holdings of financial transaction reports. Such requests frequently require significant effort and review to produce data that is comprehensive enough to assist the requestor, yet ensures that the integrity and security of FINTRAC’s financial intelligence is protected.

The ATIP Office provides updates to senior management within FINTRAC’s corporate governance, as well as providing briefings on ATIP files to FINTRAC’s Executive Committee.

9. Proactive publication

As per the Directive on Proactive Disclosure, FINTRAC has an established process in place to ensure the Centre meets all of the proactive publication requirements under Part 2 of the Act. The Directive sets out the roles and responsibilities for all proactive publishing obligations. The ATIP Office is responsible for ensuring and documenting FINTRAC’s compliance with the Act’s requirements.

The following table identifies the proactive disclosure requirements and 2024–25 performance of FINTRAC under Part 2 of the Act, Sections 82 to 88.

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines	Link to web page where published
Apply to all Government Institutions as defined in section 3 of the <i>Access to Information Act</i>						
Travel Expenses	82	Within 30 days after the end of	Yes	Finance and Administration	100	https://search.open.canada.ca/travel

		the month of reimbursement				
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Yes	Finance and Administration	100	https://search.open.canada.ca/hospitality
Reports tabled in Parliament	84	Within 30 days after tabling	Yes	Communications / ATIP Office	100	https://search.open.canada.ca/open-data/?collection=parliament_report
Apply to government entities or Departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the <i>Financial Administration Act</i>						
Contracts over \$10,000	86	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	Yes	Finance and Administration	100	https://search.open.canada.ca/contracts
Grants & Contributions over \$25,000	87	Within 30 days after the quarter	No	n/a	n/a	n/a
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	Yes	Communications / ATIP Office	No instances	n/a
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	Yes	Communications / ATIP Office	100	https://search.open.canada.ca/briefing_titles
Packages of briefing materials prepared for a deputy head or equivalent's appearance before a	88(c)	Within 120 days after appearance	Yes	Communications / ATIP Office	100	https://search.open.canada.ca/open-data/?collection=parliament_committee_deputy

committee of Parliament						
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10. Closing

FINTRAC remains fully committed to applying the spirit and intent of the Act to ensure openness, transparency, and consistency when processing requests within its organization and when responding to the Canadian public.



Financial Transactions and
Reports Analysis
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DELEGATION ORDER ARRÊTÉ DE DÉLÉGATION DE POUVOIRS

Access to Information Act and Regulations Loi sur l'accès à l'information et règlements

Pursuant to Section 95 of the *Access to Information Act*, the Financial Transactions and Reports Analysis Centre of Canada's Director and Chief Executive Officer delegates the full authority to exercise the powers, functions and duties under the *Access to Information Act* to the Manager of Communications and Chief Privacy Officer, and to the Access to Information and Privacy Coordinator. This delegation order also applies to persons occupying any of these positions on an acting basis.

En vertu de l'article 95 de la *Loi sur l'accès à l'information*, la directrice et présidente-directrice générale du Centre d'analyse des opérations et déclarations financières du Canada délègue au gestionnaire des Communications et chef de la protection des renseignements personnels, et au coordonnateur de l'Accès à l'information et de la protection des renseignements personnels les pouvoirs et fonctions qui lui sont attribués par cette même loi. Le présent arrêté s'applique également aux personnes occupant les postes susmentionnés par intérim.

**This designation takes effect as of March 31, 2023
La présente désignation entre en vigueur le 31 mars 2023**

Paquet, Sarah

Digitally signed by: Paquet, Sarah
DN: CN = Paquet, Sarah C = CA O = GC
OU = FINTRAC-CANAFE
Date: 2023.03.29 17:53:09 -04'00'

Sarah Paquet
Director and Chief Executive Officer
Financial Transactions and Reports Analysis Centre of Canada
Directrice et présidente-directrice générale
Centre d'analyse des opérations et déclarations financières du Canada