



Military Police  
Complaints Commission  
of Canada

Commission d'examen des plaintes  
concernant la police militaire  
du Canada

## **Access to Information Act**

Annual Report

April 1, 2024 – March 31, 2025

For an electronic version of the publication, please consult the Military Police Complaints MPCC of Canada's website at [mpcc-cppm.gc.ca](http://mpcc-cppm.gc.ca).

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## 1. Introduction

The Military Police Complaints Commission of Canada (MPCC) is pleased to submit to Parliament its Annual Report on the administration of the [Access to Information Act](#) for the fiscal year 2024-25 (April 1, 2024 to March 31, 2025). This report was prepared and tabled in accordance with [section 94 of the Access to Information Act](#).

The purpose of the *Access to Information Act* is to enhance the accountability and transparency of federal institutions to promote an open and democratic society and to enable public debate on the conduct of those institutions.

The *Access to Information Act* gives Canadian citizens, permanent residents or any individuals and corporation present in Canada, a right to access information contained in government records, subject to certain specific and limited exceptions. Providing access to government records is a cornerstone of transparency and accountability and a pillar of Canada's democracy.

The MPCC is an administrative tribunal created by Parliament to provide independent, civilian oversight of the Canadian Forces Military Police. As a federal institution, it is part of the Defence portfolio for reporting purposes.

The MPCC's mandate is set out in Part IV of the *National Defence Act*, which provides the following powers:

- monitoring investigations by the Canadian Forces Provost Marshal of military police conduct complaints;
- reviewing disposition of conduct complaints about military police members, at the request of complainants;
- investigating complaints of interference made by military police members;
- conducting public interest investigations and hearings;
- reporting findings and making recommendations to the military police and national defence leadership.

The mission of the MPCC is to promote and ensure the highest standards of conduct by the military police, to deter interference in military police investigations and to enhance public confidence in military policing.

The MPCC did not have any non-operational ("paper") subsidiaries to report during this review period.

Finally, the MPCC has submitted and tabled its reports to Parliament.

## 2. Organizational Structure to Fulfill the MPCC *Access to Information Act* Responsibilities

The MPCC is a micro-organization of 31 employees. To fulfil its *Access to Information Act* requirements, access to information including proactive publication is a shared responsibility; however, the Access to Information and Privacy (ATIP) mandate resides with the Corporate Services Sector.

The Senior Director, Corporate Services, is identified as the MPCC's ATIP Coordinator; he is supported by both the Manager, Corporate Reporting, ATIP and Administration, and the Administrative Services Officer which in total dedicate an average of 13.3% of their time to fulfil the MPCC's obligations under both the *Access to Information Act* and the *Privacy Act*. The MPCC also hires one ATIP consultant, as required.

The ATIP coordinator is responsible for implementing and managing programs and services relating to the MPCC's administration of the *Access to Information Act* and the *Privacy Act*, as well as for providing advice to its employees as they fulfil their obligations under both Acts.

Responding to Access to Information requests is a shared responsibility between the delegated request processing team and the Offices of Primary Interest.

The main activities involved in processing requests for Access to Information are:

- Analyze purpose/history of requests, interpret legislation, and determine information that may be disclosed, exempted, or excluded.
- Provide advice and consultation to requesters, third-party stakeholders and the MPCC's management and employees, respond to questions and concerns, ensure that they have a clear understanding of the legislation, the MPCC's policies and procedures for handling requests, and other Access to Information related issues, including document security classification.
- Conduct research and consultations with other departments and third parties to prepare responses to requests.
- Provide recommendations for the preparation of evidence to be disclosed during a Public Interest Hearing in accordance with the *Access to Information Act*, Open Court Principles and other applicable policies and procedures.
- Prepare reports for the MPCC's management on Access to Information requests and statistical reports, Annual Reports for submission to Parliament and information required by Info Source.

The MPCC did not provide services related to access to information to other government institutions and was not party to any service agreements with other government institutions under [section 96 of the Access to Information Act](#).

The responsibility for proactive publication of information falls within the MPCC's Corporate Services Sector. Corporate Services, by reviewing and approving all monthly proactive disclosure reports, ensures that each proactive publication requirement is met. For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication

requirement under Part 2 of the *Access to Information Act*, see the section “**Proactive Publication under Part 2 of the ATIA**”, below.

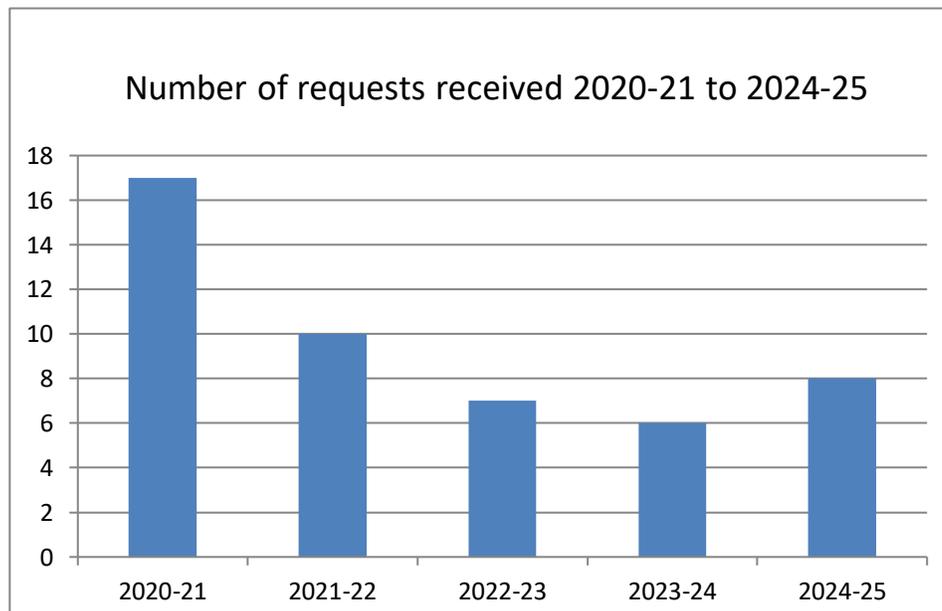
### 3. Delegation Order

Pursuant to [section 95\(1\) of the \*Access to Information Act\*](#), the Chairperson has delegated certain of her powers, duties and functions under the *Access to Information Act* and related regulations to the Senior Director, Corporate Services, the Manager, Corporate Reporting, ATIP and Administration, and, the Administrative Services Officer. The Delegation Order in effect on March 31, 2025, found in [Appendix A](#) was signed in October 2023.

### 4. Performance under Part 1 of the *Access to Information Act*, 2024–2025

During this review period, the MPCC responded to 62.5% of the requests received within the legislative timeline. This year the MPCC completed 8 requests, which represented 5,140 pages processed and released 955 pages: 3 from the public, 2 from the media and 2 which declined to identify. Of the 8 requests received by the MPCC this fiscal year: 1 request received full disclosure, 4 requests received partial disclosure, 1 request was transferred to another government department, 1 request was abandoned and 1 for which no records existed.

The graphic below shows, for 2020-21 to 2024-25, the numbers of access to information requests the MPCC completed each year. In 2021-22, the number of requests decreased significantly from the 2020-21 level. In 2021-22, 2022-23, and 2023-24, the number of requests continued to decrease. In 2024-2025 the number of requests increased slightly in comparison to 2023-2024.



The number of completed requests, broken down by completion time were: 4 were completed within 0 to 15 days, 1 was completed within 16 to 30 days, 1 was completed with 31 to 60 days and 2 were completed within 61 to 120 days.

One extension was applied under [section 9\(1\) of the Access to Information Act](#), due to a request for a consultation with another federal institution.

The MPCC received and closed no consultations relating to the *Access to Information Act* from other federal institutions, all within a 15-day timeframe.

The MPCC invoked exemptions pursuant to section 19(1) (personal information).

The MPCC closed all active requests during this review period.

No complaints relating to the *Access to Information Act* were received during this review period.

## **5. Training and Awareness**

The MPCC's learning directive requires that all new employees complete 2 mandatory online courses related to Access to Information through the Canada School of Public Service portal i.e., Fundamentals of Information Management (COR501) and Access to Information and Privacy Fundamentals (COR502).

Furthermore, employees arriving at the MPCC attend, within their first weeks, an internal awareness session, which provides an overview of the proper handling of information and privacy requests, as well as their role and responsibilities relating to the *Access to Information Act*.

## **6. Policies, Guidelines, and Procedures**

During this reporting period, the ATIP team continued to use a new procedure to provide quarterly status reports on Access to Information requests received and closed to the attention of the MPCC's Executive committee. The MPCC formalized its proactive disclosure tracking in 2024-2025.

## **7. Initiatives and Projects to Improve Access to Information**

The following internal initiatives to improve Access to Information were implemented during the reporting period:

- ATIP team actively participates in events organized by the Access to Information and Privacy Communities Development Office (APCDO) to keep our knowledge up to date and to keep abreast of best practices.
- Reviewed our process for obtaining Executive Committee approval for the release of documents related to access to information and/or privacy requests to ensure a consistent application of relevant laws and regulations.

## **8. Summary of Key Issues and Actions Taken on Complaints**

Over the period covered by this report, no complaints were filed against the MPCC with the Office of the Information Commissioner of Canada, no audits were conducted and no appeals concerning access to information requests were filed in Federal Court.

## 9. Proactive Publication of Information under Part 2 of the *Access to Information Act*

Part 2 of the *Access to Information Act* requires federal institutions and entities to proactively publish specific information known to be of interest to the public, such as: a variety of briefing materials prepared for ministers and deputy heads of institutions, titles and tracking numbers of memoranda, position reclassifications, and others.

For the purposes of [Part 2 of the Access to Information Act](#), the MPCC is a government institution as described in sections 3 and 81 of the *Access to Information Act*. The Senior Director, Corporate Services reviews and approves the monthly proactive disclosure reports. The reports are then published on the [Canada's Open Government Portal](#) within legislated timelines. The reports can also be accessed from the [MPCC's website](#).

Table 1 describes the MPCC's proactive disclosure requirement under the *Access to Information Act*. The MPCC does not publish proactive disclosure under the legislative requirement for the Minister, sections 74(a) to 78, as the MPCC is one of 8 organizations in the Defence Portfolio. While it reports to Parliament through the Minister of National Defence (MND), the MPCC is both administratively and legally independent from the Department of National Defence (DND). The MPCC is not subject to direction from the MND in respect of its operational mandate.

**Table 1 - Proactive Publication Requirements**

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or position(s) responsible for fulfilling requirement	% of proactive publications published within legislated timelines*	Link to web page where published**
<b>Apply to all Government Institutions as defined in section 3 of the <i>Access to Information Act</i></b>						
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Yes	Financial Services	100%	<a href="#">Annual Expenditures on Travel, Hospitality and Conferences</a>
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Yes	Financial Services	100%	<a href="#">Hospitality Expenses</a>
Reports tabled in Parliament	84	Within 30 days after tabling	Yes	Corporate Reporting, ATIP and	100%	<a href="#">Reports</a>

				Administrati on		
<b>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></b>						
Contracts over \$10,000	86	Q1-3: Within 30 days after the quarter  Q4: Within 60 days after the quarter	Yes	Financial Services	100%	<a href="#">Search Government Contracts over \$10,000</a>
Grants & Contributions over \$25,000	87	Within 30 days after the quarter	Yes	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	N/A	N/A	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	N/A	N/A	N/A
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	Yes	Corporate Reporting, ATIP and Administration	100%	<a href="#">Briefing Note Titles and Numbers</a>
<b>Applies to government institutions that are departments named in Schedule I to the <i>Financial Administration Act</i> 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)</b>						

Reclassification of positions	85	Within 30 days after the quarter	Yes	Human Resources	100%	<a href="#">Position Reclassification</a>
Apply to Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office)						
Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	No	N/A	N/A	N/A
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	No	N/A	N/A	N/A
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 Commons in June and December	No	N/A	N/A	N/A
Travel Expenses	75	Within 30 days after the end of the month of reimbursement	No	N/A	N/A	N/A
Hospitality Expenses	76	Within 30 days after the end of	No	N/A	N/A	N/A

		the month of reimbursement				
<b>Contracts over \$10,000</b>	77	Q1-3: Within 30 days after the quarter  Q4: Within 60 days after the quarter	No	N/A	N/A	N/A
<b>Ministers' Offices Expenses</b>  <b>Note: This consolidated report is currently published by TBS on behalf of all institutions.</b>	78	Within 120 days after the fiscal year	No	N/A	N/A	N/A

\*When counting proactive publication requirements count monthly or quarterly reports as a single publication.

\*\*i.e., specific page where that information is located on open.canada.ca or the institution's website

The MPCC did not submit any proactive disclosure report concerning briefing materials for a deputy head's appearance before a committee of Parliament because the MPCC was not called to appear. Additionally, the MPCC did not submit any proactive disclosure report concerning packages of briefing materials prepared for new or incoming deputy heads or equivalent, as none was required. Finally, the MPCC has no authority to make grants and contributions.

## 10. Monitoring Compliance

During this reporting period, the MPCC was not actively monitoring the time taken to process access to information requests and used estimates to determine costs associated with full-time staff. However, from the receipt to the closure of all Access to Information requests, the MPCC monitors processing times by promptly entering all actions and activities in its internal ATIP status report (which includes both Access to Information and Privacy requests), legislated timelines are also entered into the report to prevent any delays in the processing of the requests received and to ensure that requests are dealt with in a timely manner.

The MPCC limits its inter-institutional consultation only as needed for the proper exercise of discretion and when there is intention to disclose records. The ATIP consultant identifies the need for consultation and explains it to the office of primary interest (OPI). Once the OPI agrees, it will then be provided to the Deputy Head for approval.

During this reporting period, the MPCC did not explore ways to assess the feasibility of making frequently requested types of information available on the MPCC's website, outside of the Open Government requests, due to a lack of resources (FTEs) in the ATIP team.

The MPCC supports the right of public access to information in contracts, information sharing agreements and information sharing arrangements in accordance with section 4.2.8 of the [Directive Access to Information Requests](#), by proactively publishing on Open Government the required information in the reports titled [Contracts over \\$10,000](#) and Annual Aggregate Report of Contracts under 10K for the calendar year. The MPCC also completes the Calendar Year Proactive Disclosure of Contracts under 10K Report which can be requested through a formal Access to information request.

The monitoring of proactively published information under Part 2 of the *Access to Information Act* is completed on a monthly basis. To ensure the accuracy and completeness of these reports they are reviewed by management and Senior Management. The reports are tracked in a tracking sheet to ensure they are completed within the required timelines.

Throughout the year, the Senior Director, Corporate Services / ATIP Coordinator submits the ATIP Status reports to the Executive Committee as an informational item on their meeting agendas. The Executive Committee consists of the Chairperson (Deputy Head), the Senior General Counsel & Director General, the Senior Director, Corporate Services / ATIP Coordinator and the General Counsel & Senior Director of Operations.

**APPENDIX A**

***Access to Information Act Delegation Order***



Military Police  
Complaints Commission  
of Canada

Commission d'examen des plaintes  
concernant la police militaire  
du Canada

270 Albert Street, 10<sup>th</sup> Floor  
Ottawa, Ontario K1P 5G8

270, rue Albert, 10<sup>e</sup> étage  
Ottawa (Ontario) K1P 5G8

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

## **Arrêté de délégation en vertu de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels***

The Chairperson of the Military Police Complaints Commission of Canada, pursuant to [section 95\(1\) of the Access to Information Act](#) and [section 73\(1\) of the Privacy Act](#), hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise certain powers, duties and functions of the Chairperson as the head of Military Police Complaints Commission of Canada, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

En vertu du [paragraphe 95\(1\) de la Loi sur l'accès à l'information](#) et du [paragraphe 73\(1\) de la Loi sur la protection des renseignements personnels](#), la présidente de la Commission d'examen des plaintes concernant la police militaire du Canada délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, certaines attributions dont la présidente est, en qualité de responsable d'une institution fédérale, investie par les dispositions de la Loi ou de son règlement mentionnées en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

La présidente de  
La Commission d'examen des plaintes concernant la police militaire du Canada

Me Tammy Tremblay, MSM, CD, LL.M  
Chairperson  
Military Police Complaints Commission of Canada

Signed in Ottawa, Ontario, Canada this 13<sup>th</sup> day of October, 2023  
Signé à Ottawa, Ontario, Canada le 13<sup>ème</sup> jour d'octobre 2023

**Schedule  
Access to Information Act Delegation Order**

The Chairperson of the Military Police Complaints Commission of Canada, pursuant to [section 95\(1\) of the Access to Information Act](#), hereby designates the persons holding the positions set out in the schedule hereto or the persons occupying on an acting basis those positions, to exercise certain powers, duties and functions of the Chairperson as the head of the Military Police Complaints Commission of Canada, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous designation orders.

**Access to Information Act**

<b>Provision</b>	<b>Description</b>	<b>Chairperson</b>	<b>Senior Director of Corporate Services</b>	<b>Manager, Corporate Reporting, ATIP and Administration</b>	<b>Administrative Services Officer</b>
4(2.1)	Responsibility of government institutions	•	•	•	•
7(a)	Notice where access requested	•	•	•	•
7(b)	Giving access to the record	•	•	•	•
8(1)	Transfer of request	•	•	•	•
9	Extension of time limits	•	•	•	•
10(1)(a) & (b)	Where access is refused	•	•		
11(1)	Additional Fee	•	•	•	•
12(2)(b)	Language of Access	•	•	•	•
12(3)(b)	Access in an alternative format	•	•	•	•
<b>Exemption Provisions of the Access to Information Act</b>					
13	Exemption – Information obtained in confidence	•	•		
14	Exemption – Federal-provincial affairs	•	•		
15	Exemption – International affairs and defence	•	•		
16	Exemption – Law enforcement and investigations	•	•		
16.5	Exemption – <i>Public Servants Disclosure Protection Act</i>	•	•		

Provision	Description	Chairperson	Senior Director of Corporate Services	Manager, Corporate Reporting, ATIP and Administration	Administrative Services Officer
17	Exemption – Safety of individuals	•	•		
18	Exemption – Economic interests of Canada	•	•		
19	Exemption – Personal Information	•	•		
20	Exemption – Third-party information	•	•		
21	Exemption – Operations of Government	•	•		
22	Exemption – Testing procedures, tests and audits	•	•		
22.1	Exemption – Internal Audits	•	•		
23	Exemption – Protected Information – solicitors, advocates and notaries	•			
24	Exemption – Statutory prohibitions against disclosure	•	•		
<b>Other Provisions of the Access to Information Act</b>					
25	Severability	•	•	•	•
26	Refusal of access where information to be published	•	•	•	•
27(1), (4)	Third party notification	•	•	•	
28(1)(b), (2), (4)	Third party notification	•	•	•	•
33	Notice to Information Commissioner of notices to third parties	•	•	•	•
35(2)(b)	Right to make representations	•	•		
37(1)(b)	Findings and recommendations of information Commissioner	•	•	•	•
37(4)	Access to be given to complainant	•	•	•	•
43(1)	Notice to third party of application to Federal Court for review	•	•	•	•
44(2)	Notice to requester of application for review by third party	•	•	•	•
52(2)	Special rules for hearings	•	•		

Provision	Description	Chairperson	Senior Director of Corporate Services	Manager, Corporate Reporting, ATIP and Administration	Administrative Services Officer
52(3)	<i>Ex parte</i> representations	•	•		
94	Annual report to Parliament	•	•		
<b>Access to Information Regulations</b>					
6(1)	Transfer of request	•	•		
7(2)	Search and preparation fees	•	•		
7(3)	Production and programming fees	•	•		
8	Method of access	•	•	•	•
8.1	Limitations in respect of format	•	•		

Dated at the City of Ottawa this 13<sup>th</sup> day of October 2023

Me Tammy Tremblay, MSM, CD, LL.M  
Chairperson  
Military Police Complaints Commission of Canada