



Office of the
Chief Electoral Officer
of Canada

2024–2025

Annual Report on the *Access to Information Act*

For the period ending March 31, 2025



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1. Introduction

The *Access to Information Act* (the Act) extends to Canadians and individuals present in Canada the right to access information in records that are under the control of a government institution. According to the principles of the Act, government 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 the government. The Act also sets out the requirements for the proactive publication of information.

This report describes how the Office of the Chief Electoral Officer administered its responsibilities under the Act during the reporting period from April 1, 2024, to March 31, 2025, and is prepared and tabled in accordance with section 94 of the Act.

1.1. Mandate of the Office of the Chief Electoral Officer

The Office of the Chief Electoral Officer is an independent, non-partisan agency that reports directly to Parliament which currently includes both Elections Canada and the Office of the Commissioner of Canada Elections. Elections Canada's mandate is to:

- ▶ be prepared to conduct a federal general election, by-election or referendum;
- ▶ administer the political financing provisions of the *Canada Elections Act*;
- ▶ monitor compliance with electoral legislation;
- ▶ conduct public information campaigns on voter registration, voting and becoming a candidate;
- ▶ conduct education programs for students on the electoral process;
- ▶ provide support to the independent commissions in charge of adjusting the boundaries of federal electoral districts following each decennial census;
- ▶ carry out studies on alternative voting methods and, with the approval of parliamentarians, test alternative voting processes for future use during electoral events; and,
- ▶ provide assistance and cooperation in electoral matters to electoral agencies in other countries or to international organizations.

In fulfilling its mandate, Elections Canada also has the responsibility to:

- ▶ appoint, train and support returning officers and retain the services of field liaison officers across Canada;
- ▶ maintain the National Register of Electors, which is used to prepare preliminary lists of electors at the start of electoral events;
- ▶ publish reports on the conduct of elections and official voting results;
- ▶ maintain electoral geography information, which provides the basis for maps and other geographic products;
- ▶ register political entities, including political parties, electoral district associations, candidates, nomination contestants, leadership contestants, third parties that engage in election advertising and referendum committees;

- ▶ administer the reimbursements and subsidies paid to eligible candidates, registered political parties and auditors;
- ▶ disclose information on registered parties and electoral district associations, registered parties' nomination and leadership contestants, candidates, third parties and referendum committees, including their financial returns;
- ▶ refer to the Commissioner of Canada Elections information concerning possible offences under the *Canada Elections Act* (or other relevant acts);
- ▶ consult the Advisory Committee of Political Parties for advice and recommendations;
- ▶ issue written opinions, guidelines and interpretation notes on the application of the *Canada Elections Act* to political entities;
- ▶ recommend to Parliament amendments for the better administration of the *Canada Elections Act* by submitting a recommendations report after a general election, as well as by providing expert advice and other special reports; and,
- ▶ appoint the Broadcasting Arbitrator, who is responsible for allocating free and paid broadcasting time among political parties and for arbitrating disputes that may arise between parties and broadcasters.

The Office of the Commissioner of Canada Elections is responsible for ensuring compliance with, and enforcement of, the *Canada Elections Act* and the *Referendum Act*.

1.2. Structure of the Access to Information and Privacy Office

The Access to Information and Privacy (ATIP) Office is part of the Office of the Chief of Staff and is headed by an Assistant Director who is supported by two senior analysts, a junior officer as well as expert consultants as required.

The ATIP Office is responsible for the following activities for both Elections Canada and the Office of the Commissioner of Canada Elections:

- ▶ processing requests under the *Access to Information Act* and the *Privacy Act*;
- ▶ responding to consultation requests from other government institutions;
- ▶ providing advice and guidance to senior management and staff on privacy issues and privacy impact assessments;
- ▶ developing and delivering awareness training to managers and employees on how to fulfill their obligations under the Acts;
- ▶ developing policies, procedures and guidelines in support of ATIP legislation and central agency requirements;
- ▶ monitoring institutional compliance with the Acts, procedures and policies;
- ▶ acting on behalf of the Office of the Chief Electoral Officer in dealings with the Treasury Board Secretariat, the offices of the Information Commissioner and Privacy Commissioner of Canada and other government institutions regarding ATIP affairs;
- ▶ preparing annual reports to Parliament, in addition to other statutory reports and materials that may be required by central agencies;

- ▶ preparing and publishing the annual update of the Office of the Chief Electoral Officer's chapter of *Info Source*, describing the agency's record holdings and personal information banks; and,
- ▶ representing the Office of the Chief Electoral Officer by participating in ATIP community forums, such as the Treasury Board Secretariat's ATIP Community meetings.

For a breakdown of the groups and positions responsible for meeting each applicable proactive publication requirement in Part 2 of the *Access to Information Act*, see the section **Proactive Publication** in Part 2, below.

The Office of the Chief Electoral Officer was not party to any service agreements under section 96 of the *Access to Information Act*.

2. Administration of the *Access to Information Act*

2.1. Education and training

Training under the Act consists mainly of educating the agency on how to assist individuals who request records under the organization’s control. In 2024–2025, the Office of the Chief Electoral Officer delivered eight formal training sessions to approximately 126 employees. The sessions provided an overview of the ATIP process, legislation, roles and responsibilities.

The ATIP Office routinely provided employees of the Office of the Chief Electoral Officer with informal briefings and advice on the processing of ATIP requests.

2.2. Institutional access to information policies and procedures

No new institutional-specific policies or procedures related to access to information were implemented during the fiscal year. The Office of the Chief Electoral Officer is continuing to review its access to information tools and procedures and update them as required.

The Office of the Chief Electoral Officer includes standard clauses in contracts, information sharing agreements and information arrangements that support the right of public access to information where appropriate. The ATIP Office reviews contracts and information sharing agreements as required and provides advice and recommendations to help ensure compliance with the Act and government policies and directives.

2.3. Institutional monitoring of access to information requests

The ATIP Office uses its case management software to monitor the status of each request, including the number of days remaining before the statutory deadline. A weekly status report of all open and recently closed files is provided to senior officials, including the Chief Electoral Officer.

2.4. Proactive publication under Part 2 of the Act

Sections 82 to 88 of Part 2 of the *Access to Information Act* stipulate that government entities must proactively publish information about travel and hospitality expenses, contracts, briefing materials prepared for the deputy head, reclassification of positions and reports tabled in Parliament.

The following table lists the proactive publication requirements under Part 2 of the *Access to Information Act* for the Office of the Chief Electoral Officer in 2024–2025, the sector within the institution that is responsible for publishing the information, the rate at which the sector was compliant with the requirement and the link to where the information is published.

Legislative requirement	ATIA section	Publication timeline	Does requirement apply to your institution?	Internal groups and positions responsible for fulfilling requirement	Percent 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 the month of reimbursement	Yes	Office of the Chief Financial Officer	100%	https://open.canada.ca/en/search/travel
Hospitality expenses	83	Within 30 days after the end of the month of reimbursement	Yes	Office of the Chief Financial Officer	100%	https://open.canada.ca/en/search/hospitality
Reports tabled in Parliament	84	Within 30 days after tabling	Yes	ATIP Office Office of the Chief Planning and Audit Officer Integrity, Regulatory Policy and Parliamentary Affairs	100%	https://www.elections.ca/content.aspx?section=abo&dir=atip/public&document=index&lang=e https://www.elections.ca/content.aspx?section=res&dir=rep&document=index&lang=e
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	Yes	Procurement and Contracting Services	100%	https://search.open.canada.ca/contracts/?page=1

		Q4: Within 60 days after the quarter				
Grants and contributions over \$25,000	87	Within 30 days after the quarter	No			
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	No			
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	Office of the Chief Electoral Officer	100%	https://search.open.canada.ca/briefing_titles/?_ga
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	Integrity, Regulatory Policy and Parliamentary Affairs	100%	https://www.elections.ca/content.aspx?section=abo&dir=comp&document=index&lang=e
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)						
Reclassification of positions	85	Within 30 days after the quarter	Yes	Office of the Chief Human Resources Officer	25%	https://search.open.canada.ca/reclassification/

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			
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			
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			
Packages of briefing materials prepared by a government institution for a minister's appearance before a	74(d)	Within 120 days after appearance	No			

committee of Parliament						
Travel expenses	75	Within 30 days after the end of the month of reimbursement	No			
Hospitality expenses	76	Within 30 days after the end of the month of reimbursement	No			
Contracts over \$10,000	77	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	No			
Ministers' offices Expenses Note: This consolidated report is currently published by TBS on behalf of all institutions	78	Within 120 days after the fiscal year	No			

Various officials within the Office of the Chief Electoral Officer work collaboratively to fulfill the proactive publication requirements found in Part 2 of the Act. At the Office of the Chief Electoral Officer, the sector that is responsible for managing the information that is subject to the proactive publication requirement under Part 2 of the Act is also responsible for proactively publishing that information as required.

The ATIP Office is responsible for providing advice on the proactive publication requirements under Part 2 of the Act, reviewing information for publication in cases where there is a concern with the disclosure of sensitive information, ensuring that the annual reports to Parliament on the institution's administration of the *Access to Information Act* and *Privacy Act* are published on the institution's website, and evaluating and reporting on the institution's compliance with the proactive publication requirements under Part 2 of the Act.

Most of the information was published by sectors within the timelines. In 2024–2025, 25 percent of the information regarding the reclassification of positions was published on time by the Office of the Chief Human Resources Officer, down from 75 percent in 2023–2024. The ATIP Office has followed up with the responsible sector to ensure that all information is published as required.

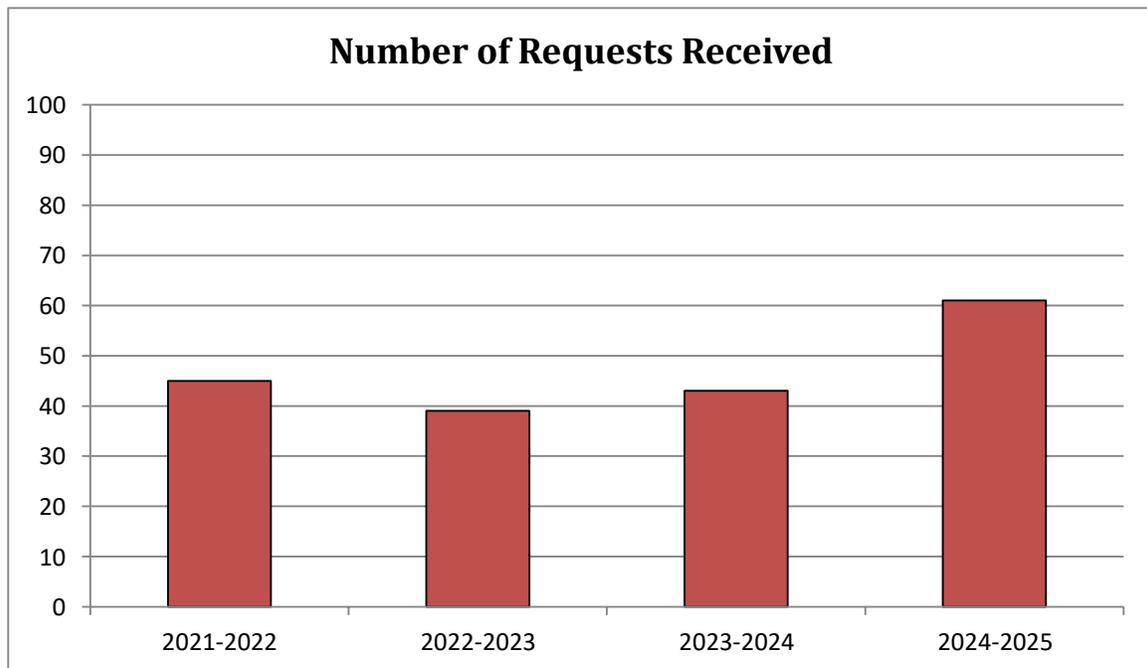
Information, records and data outside of the information that must be published under Part 2 of the Act is also published by the Office of the Chief Electoral Officer on the websites of [Elections Canada](#) and the [Commissioner of Canada Elections](#), and on the [Open Governmental Portal](#) under Elections Canada.

3. Statistical Report on Requests Under the *Access to Information Act*

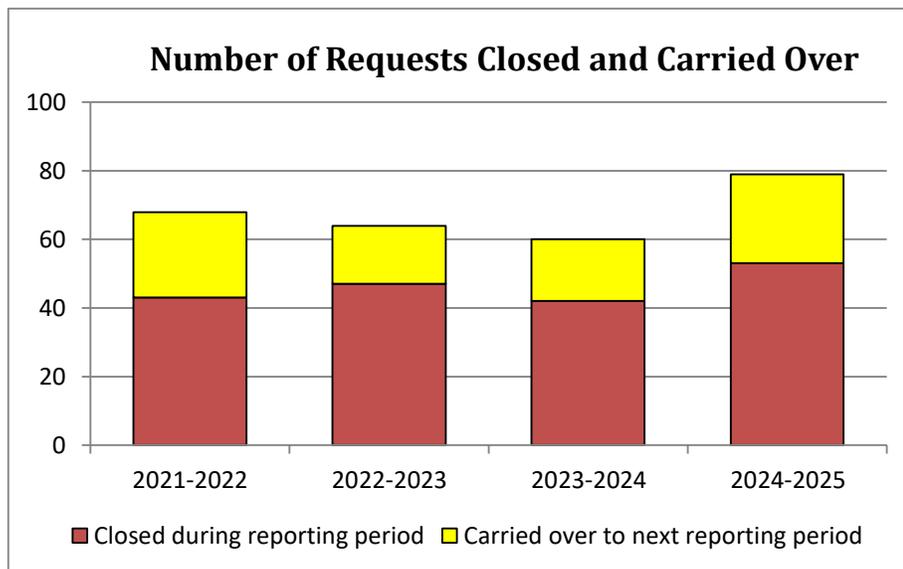
This section provides an interpretation of select statistics on the processing of requests made to the Office of the Chief Electoral Officer under the Act. All figures and data for the 2024–2025 fiscal year were provided to the Treasury Board of Canada Secretariat (TBS), who publishes the data on the [Open Government website](#).

3.1. Number and origin of formal requests

The Office of the Chief Electoral Officer received 61 formal requests for information under the Act during the period between April 1, 2024, and March 31, 2025. This number increased by 42 percent from the previous year when 43 formal requests were received.



A total of 79 requests required action in 2024–2025, including 18 requests that were carried over from the previous fiscal year. As the graph below demonstrates, 53 of those requests (67 percent) were closed during the reporting period. This is down from the previous year when 70 percent of requests that required action were closed during the reporting period. Twenty-six requests were carried over into the next reporting period.



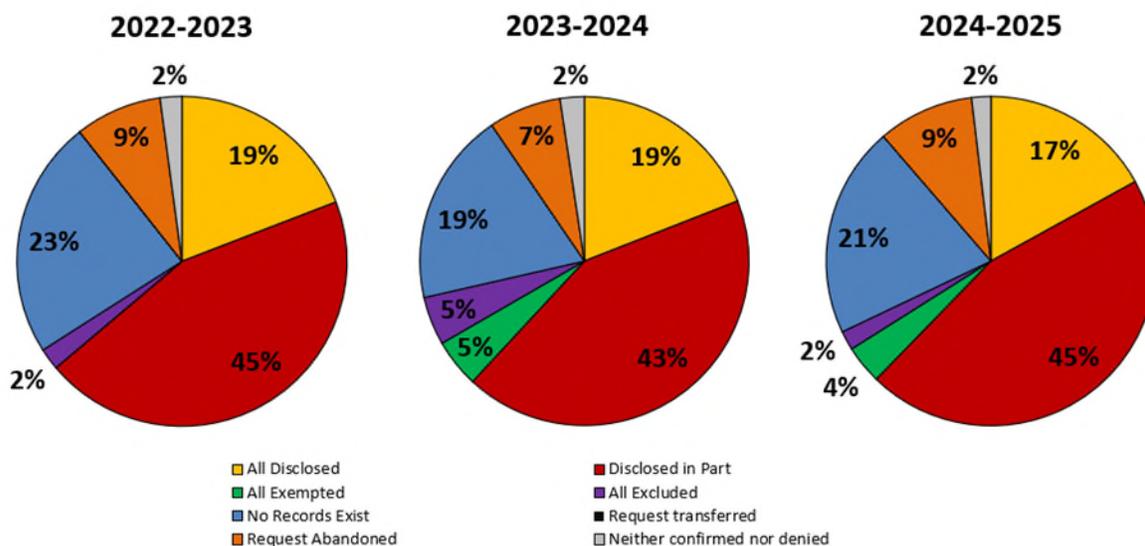
These new requests were initiated by the media (8), private sector businesses (2), the general public (29), academia (10), organizations (0) and requesters who declined to identify themselves (12).

Of the 26 requests that were carried over into the next reporting period, twelve (46 percent) were received in 2024–2025, six of which meet the legislated timelines; one (4 percent) was received in 2023–2024; two (8 percent) were received in 2022–2023; two (8 percent) were received in 2021–2022; five were received in 2020–2021 (19 percent); and four (15 percent) were received in 2019–2020. As of March 31, 2025, a total of 20 requests did not meet the legislated timelines.

3.2. Disposition of completed requests

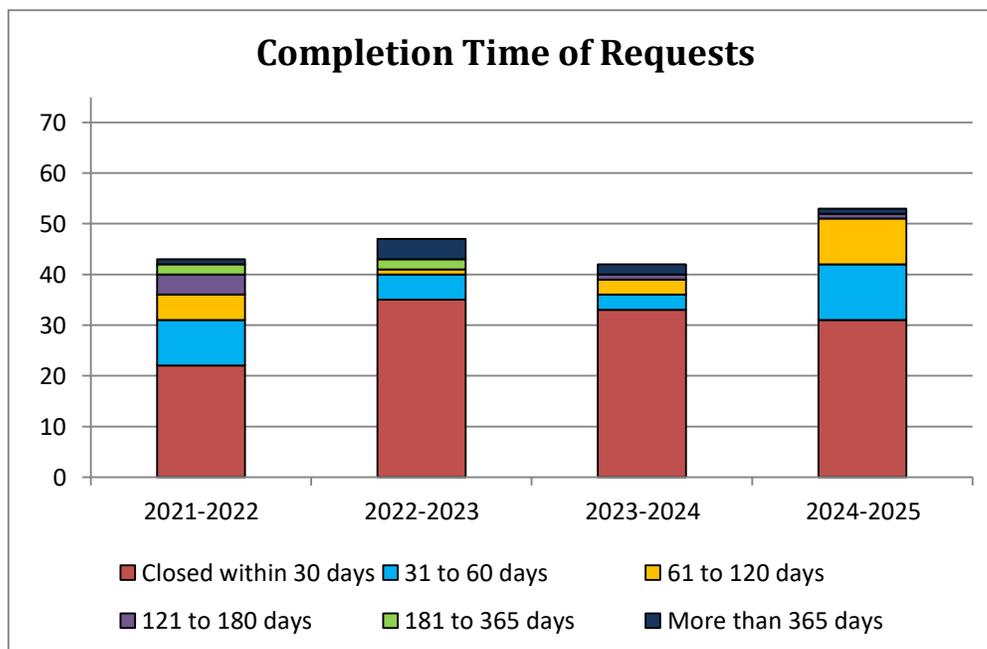
Fifty-three requests were completed during the reporting period, nine (17 percent) of which resulted in full disclosure of information, up from eight (19 percent) in 2023–2024. Twenty-four requests (45 percent) resulted in partial disclosure of information, up from eighteen (43 percent) the previous year. Records did not exist for eleven requests (21 percent), up from eight (19 percent) in 2023–2024. Zero requests (0 percent) were transferred to another government institution, equal to the last fiscal year. Five requests (9 percent) were abandoned during the reporting period, up from three (7 percent) the previous year. We neither confirmed nor denied the existence of records for one request (2 percent) in 2024–2025, equivalent to one (2 percent) from the previous fiscal year. Two requests were fully exempted (4 percent), equal to the two (5 percent) in the last fiscal year, and one was fully excluded (2 percent), down from two (5 percent) in 2023–2024. No requests (0 percent) were declined to be acted upon with the approval of the Information Commissioner in 2024–2025.

Disposition of Completed Requests



3.3. Completion time of requests

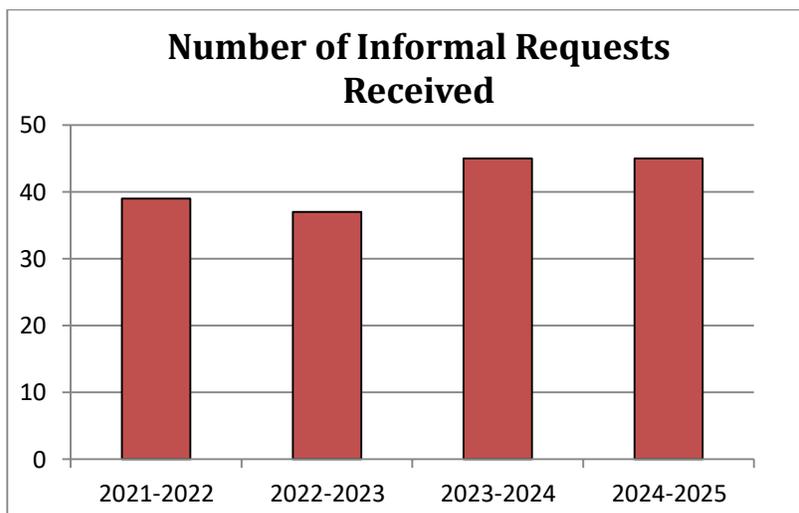
In 2024–2025, forty-six requests (87 percent) were completed within the legislated timelines. A total of thirty-one requests (58 percent) were completed within 30 days, down from thirty-three (79 percent) in 2023–2024; eleven requests (21 percent) were closed within 31 to 60 days, nine (17 percent) within 61 to 120 days, one (2 percent) within 121 to 180 days, none (0 percent) within 181 to 365 days, and one (2 percent) was closed more than 365 days after it was received.



Longer completion times can be explained by a variety of factors. They are most commonly attributed to outstanding requests from previous years, workload, requests that require consultations with internal or external parties, requests that are broad in scope and involve a high volume of records, sensitive records related to advice or recommendations developed by or for a government institution, security, or investigations, examinations or reviews under the *Canada Elections Act*.

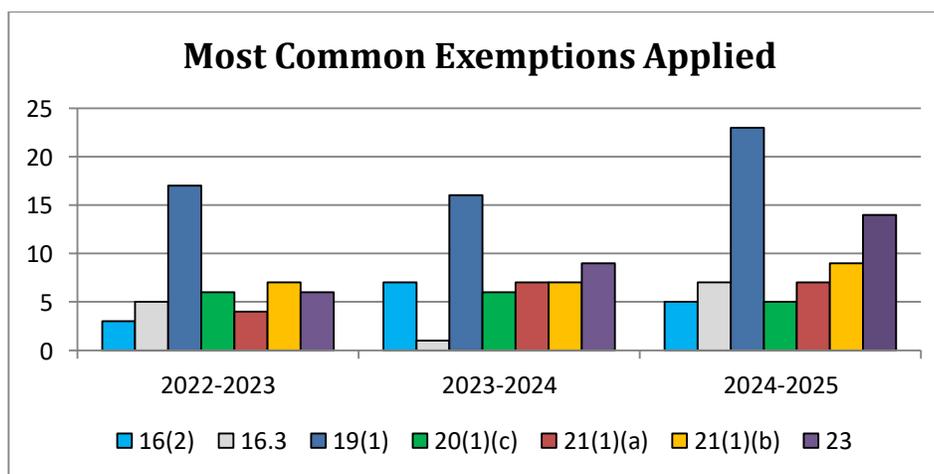
3.4. Informal releases of records

The Office of the Chief Electoral Officer publishes monthly [online summaries](#) of all recently completed, formal access to information requests as required by the Treasury Board Secretariat. The published summaries allow individuals to informally request copies of records previously released under the Act. In the 2024–2025 reporting period, the ATIP Office released 45 packages informally, the same number of informal requests released in the previous fiscal year.



3.5. Exemptions to the release of information

The statistical report provided to the Treasury Board of Canada Secretariat (TBS) includes the number of requests for which the Office of the Chief Electoral Officer invoked specific types of exemptions and provides details on these exemptions. If an exemption is invoked several times in the same request, it is reported only once. The graph below includes the seven exemptions applied most frequently during the 2024–2025 fiscal year.



In 2024–2025, the most common exemption applied was under subsection 19(1) of the Act. It was used to protect personal information for 23 requests. Information was exempted for 14 requests under section 23 as being subject to solicitor-client privilege. Subsection 16(2) allows for the exemption of information that could reasonably be expected to facilitate the commission of an offence and was applied for five requests. Paragraph 21(1)(a) permits heads of government institutions to withhold information that contains advice or recommendations developed by or for government officials. This exemption was applied to seven requests this reporting period. Paragraph 21(1)(b) allows for the exemption of accounts of consultations and deliberations among government staff and was applied to a total of nine requests. Paragraph 20(1)(c) was applied for five requests and pertains to information the disclosure of which could reasonably be expected to result in material financial loss or gain or could reasonably be expected to prejudice the competitive position of a third party. Subsection 16.3 allows the Chief Electoral Officer to refuse the disclosure of records obtained or created during an investigation, examination or review under the *Canada Elections Act*. It was applied for seven requests.

3.6. Extensions of the time limit

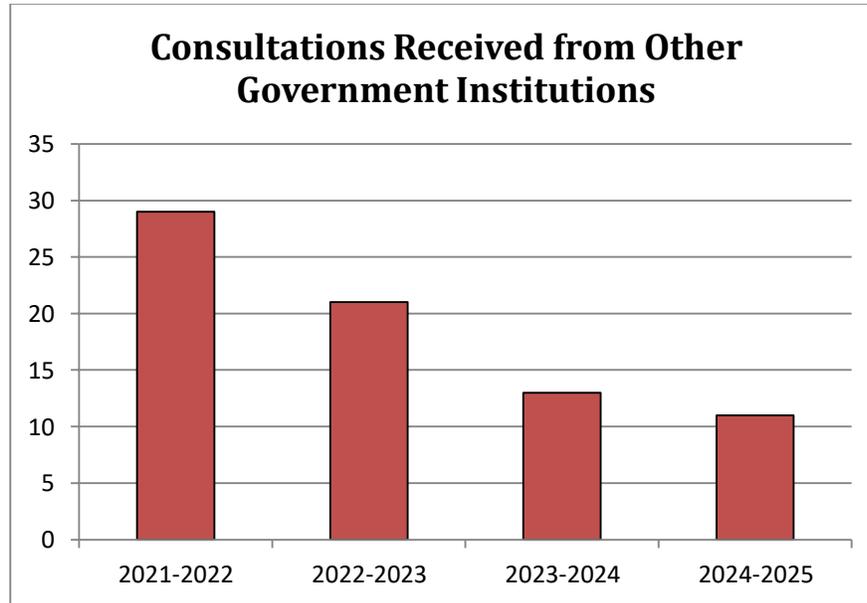
The Office of the Chief Electoral Officer took 17 extensions during the reporting period, 13 of which were taken under paragraph 9(1)(a) of the Act. Paragraph 9(1)(a) allows for an extension if a request is for a large volume of records and unreasonably interferes with the operations of the institution. One extension was taken under paragraph 9(1)(b), which states that, if a request requires consultations that cannot be reasonably completed by the statutory deadline, an extension is permitted. Three extensions were taken under paragraph 9(1)(c) for the notification of third parties.

In sixteen cases (94 percent), the extensions did not exceed 120 days, in comparison to all eight cases not exceeding 60 days in 2023–2024. In 2024–2025, there was one request that required an extension of 365 days or more.

It is the practice of the ATIP Office to provide partial preliminary release of records before the extended due date whenever possible.

3.7. Consultations

The ATIP Office received 11 consultations from other government institutions in 2024–2025, all (100 percent) of which were responded to in 30 days or less. The number of formal consultations decreased by 15 percent from the previous year in which 13 formal consultations were received.



The ATIP Office only undertakes a consultation with another government institution when more information is required for the proper exercise of discretion to withhold information or when there is potentially sensitive information that could be disclosed.

4. Complaints

Individuals who are not satisfied with the processing of their access to information request can file a complaint with the Office of the Information Commissioner of Canada.

The Office of the Information Commissioner received a total of six complaints against the Office of the Chief Electoral Officer in 2024–2025. At the beginning of the reporting period, the Office of the Information Commissioner also had to consider four outstanding complaints received in previous years. Four complaints against the Office of the Chief Electoral Officer were closed in 2024–2025.

The Office of the Information Commissioner determined that one complaint received in 2022–2023 alleging that the Office of the Chief Electoral Officer had failed to conduct a reasonable search for records was not well founded. Investigations of two complaints received in 2022–2023, one alleging that the Office of the Chief Electoral had failed to conduct a reasonable search for records and one alleging that the Office of the Chief Electoral Officer had improperly applied exemptions, were discontinued. One complaint received in 2021–2022 alleging that the Office of the Chief Electoral Officer had improperly applied exemptions was well founded, as information was disclosed to the requester during the investigation.

The six complaints received in 2024–2025, two alleging that the Office of the Chief Electoral Officer had failed to conduct a reasonable search for records and that records must exist, three alleging that the Office of the Chief Electoral Officer had improperly applied exemptions, and one complaint alleging that the Office of the Chief Electoral Officer had taken an unreasonable extension, were still under investigation at the end of the fiscal year.

Appendix I: Delegation of Authority



**ARRÊTÉ DE DÉLÉGATION
EN VERTU DU PARAGRAPHE 95(1) DE
LA LOI SUR L'ACCÈS À
L'INFORMATION**

En vertu du paragraphe 95(1) de la *Loi sur l'accès à l'information*, par la présente je délègue au titulaire du poste de Directeur adjoint, Accès à l'information et protection des renseignements personnels, ou en l'absence de cette personne, au titulaire du poste de Chef de cabinet, y compris toutes personnes nommées à ces deux postes de manière intérimaire, les attributions en lien avec les documents qui relèvent du Bureau du directeur général des élections, dont je suis, en qualité de responsable d'une institution fédérale, investi conformément à la *Loi sur l'accès à l'information*, à l'exception des documents qui relèvent exclusivement du Commissaire aux élections fédérales.

En vertu du paragraphe 95(1) de la *Loi sur l'accès à l'information*, par la présente je délègue au titulaire du poste de Commissaire aux élections fédérales, ainsi qu'au titulaire du poste de Directeur adjoint, Accès à l'information et protection des renseignements personnels, ou en l'absence de cette personne, au titulaire du poste de Chef de cabinet, y compris toutes personnes nommées à ces trois postes de manière intérimaire, les attributions en lien avec les documents qui relèvent exclusivement du Commissaire aux élections fédérales dont je suis, en qualité de responsable d'une institution fédérale, investi conformément à la *Loi sur l'accès à l'information*.

**DELEGATION ORDER
PURSUANT TO SUBSECTION 95(1) OF
THE ACCESS TO INFORMATION ACT**

Pursuant to subsection 95(1) of the *Access to Information Act*, I hereby delegate to the person appointed to the position of Assistant Director, Access to Information and Privacy, or in that person's absence, the person appointed to the position of Chief of Staff, including any persons appointed to these two positions on an acting basis, the powers, duties and functions related to the records that are under the control of the Office of the Chief Electoral Officer, conferred upon me as the head of the government institution by the *Access to Information Act*, except as it relates to the records that are exclusively under the control of the Commissioner of Canada Elections.

Pursuant to subsection 95(1) of the *Access to Information Act*, I hereby delegate to the person appointed to the position of Commissioner of Canada Elections, as well as the person appointed to the position of Assistant Director, Access to Information and Privacy, or in that person's absence, the person appointed to the position of Chief of Staff, including any persons appointed to these three positions on an acting basis, the powers, duties and functions conferred upon me as the head of the government institution by the *Access to Information Act* and that are related to the records that are exclusively under the control of the Commissioner of Canada Elections.

Il est entendu que cette délégation remplace toutes délégations antérieures de ma part ou de la part de mes prédécesseurs émises en vertu de l'article 73 de la *Loi sur l'accès à l'information*.

For greater certainty, this delegation supersedes all previous delegations by me or my predecessors made pursuant to section 73 of the *Access to Information Act*.

Signée à Gatineau le / Signed in Gatineau on July 30, 2020.



Stéphane Perrault

Directeur général des élections / Chief Electoral Officer