



# Library and Archives Canada

Annual Report on the *Privacy Act*

2024–2025



Library and Archives  
Canada

Bibliothèque et Archives  
Canada

Canada

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Annual Report on the *Privacy Act* (Library and Archives Canada)

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la *Loi sur la protection des renseignements personnels* (Bibliothèque et Archives Canada)

## Table of Contents

Highlights .....	4
Introduction.....	4
Mandate of Library and Archives Canada .....	4
Organizational structure.....	5
Service agreements .....	9
Delegation order .....	9
Types of requests processed under the <i>Privacy Act</i> .....	10
Interpretation of the statistical report on the <i>Privacy Act</i> .....	12
Training and awareness .....	20
Policies, guidelines and procedures.....	21
Initiatives and projects to improve privacy awareness/management .....	22
Summary of key issues and action taken on complaints .....	23
Material privacy breaches.....	24
Privacy impact assessments .....	24
Public interest disclosures .....	24
Monitoring compliance .....	24
Appendix .....	25

## Highlights

The following is a summary of the key achievements of Library and Archives Canada (LAC) regarding the administration of the *Privacy Act* (the Act) during 2024–2025. The numbers presented below include formal privacy requests only.

- At the beginning of 2024–2025, LAC had 347 outstanding requests from previous reporting periods.
- 2,723 requests were received in 2024–2025, representing a 17% increase from the previous reporting period.
- 2,485 requests were completed during the reporting period, an increase of 13% from the previous reporting period.
- Of the requests completed in 2024–2025, 2,226 were completed within statutory timelines - 90% of requests, compared to 72% of requests in 2023–2024.

## Introduction

The Act provides all individuals, whether they are within or outside Canada, the right to access and to correct their personal information held by a government institution. The Act also provides the legal framework for the collection, retention, use, disclosure, disposition and validation of the accuracy of personal information in the administration of programs and activities by government institutions subject to the Act.

The Act defines “personal information” as “information about an identifiable individual that is recorded in any form”. Examples of personal information include data about the national or ethnic origin, colour, religion, age or marital status of an individual; the education or the medical, criminal, financial or employment history of an individual; the address, fingerprints or blood type of an individual; and any identifying number, symbol or other identifier assigned to an individual.

This report is prepared and tabled to Parliament in accordance with section 72 of the Act. It covers the period from April 1, 2024, to March 31, 2025, for LAC.

## Mandate of Library and Archives Canada

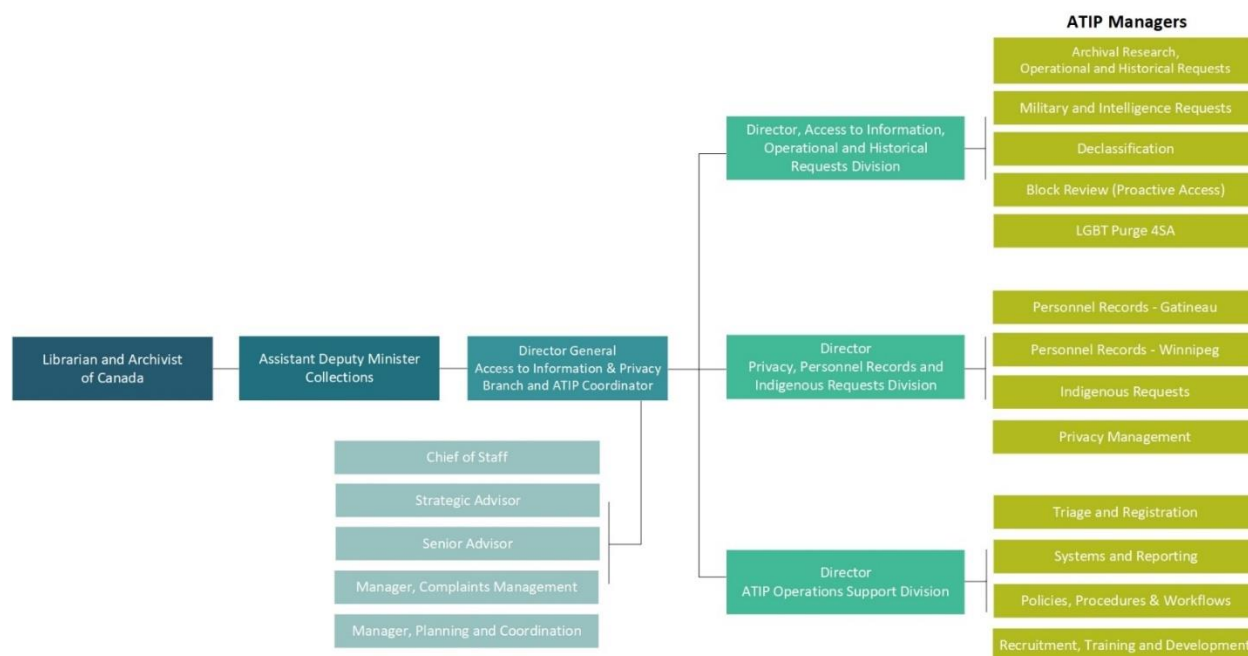
The mandate of LAC is

- to preserve the documentary heritage of Canada for the benefit of present and future generations;
- to be a source of enduring knowledge accessible to all, contributing to the cultural, social and economic advancement of Canada as a free and democratic society;
- to facilitate in Canada co-operation among communities involved in the acquisition, preservation and diffusion of knowledge; and
- to serve as the continuing memory of the Government of Canada and its institutions.

## Organizational structure

The organizational chart below outlines the reporting structure relating to the ATIP Branch at LAC in 2024–2025. The number of full-time employees (FTEs) in each section has been included with the team’s descriptions.

**Figure 1: ATIP Branch reporting structure**



### Office of the Director General, ATIP (14.58 FTEs during the reporting period)

#### Chief of Staff

- Provides guidance and recommendations to executives and management for the integrated operations of the Branch.

#### Strategic Advisor

- Provides advice and represents LAC in external-facing initiatives relative to ATIP, such as legislative reform.
- Provides project oversight, guidance and expertise to LAC and collaborates with other institutions on specific initiatives, such as the LGBT Purge 4SA.

#### Senior Advisor

- Supports change management activities across the Branch.
- Designs and delivers products to help communicate the LAC ATIP story.

## Complaints Management

- Handles administrative tasks related to incoming complaints.
- Communicates with the Office of the Information Commissioner (OIC) and collaborates with LAC's Legal Services to respond to complaints or settlements.
- Communicates with the Office of the Privacy Commissioner (OPC) on complaints and coordinates with LAC's Privacy Management team on complaints received.
- Develops and implements strategies to address recurring issues and prevent future complaints.
- Communicates with complainants to provide updates and resolutions in a transparent and responsive manner.
- Maintains accurate records of complaints, including documentation of investigations and resolutions.

## Planning and Coordination

- Ensures coordination and oversight for financial and human resources management across the Branch.
- Gathers necessary information for budget forecasting and management, integrated planning and results achieved, project management and reporting.
- Provides administrative support to the Branch and helps coordinate ongoing tasks and projects (human resources, finances, etc.).

## **Access to Information, Operational and Historical Requests Division** (52.47 FTEs during the reporting period)

### Archival Research, Operational and Historical Requests

- Processes formal and informal access and privacy requests on LAC's operational records and handles consultation requests from other GC institutions.
- Processes formal and informal access and privacy requests on restricted GC archival records in LAC's collections and handles requests related to other archival subject matter.
- Produces research reports to enable analysts to better exercise their discretion when processing requests and complaints.

### Military and Intelligence Requests

- Processes formal and informal access and privacy requests on restricted GC archival records in LAC's collections related to military and intelligence subject matter.

## Declassification

- Represents LAC in ongoing discussions with the Treasury Board Secretariat (TBS) and the Access to Information (ATI) Reform team on declassification.
- Engages with GC partners and international counterparts on declassification initiatives and projects.

## Block Review (Proactive Access)

- Performs a proactive risk-based review of archival records in LAC's holdings in accordance with the *Access to Information Act* and the *Privacy Act*, following a set procedure, to determine if blocks of records can be proactively opened and made available to the public and researchers.
- Develops strategic mechanisms for the proactive opening of records in LAC's collection, in collaboration with other business areas at LAC, to improve discoverability of the collection.

## LGBT Purge 4SA

- Performs ATIP review on selected records in accordance with GC's response to the LGBT Purge Class Action Final Settlement Agreement.

## **Privacy, Personnel Records and Indigenous Requests Division** (65.12 FTEs during the reporting period)

### Personnel Records – Gatineau

- Processes formal and informal access and privacy requests for restricted personnel files of former members of the Canadian Armed Forces (CAF) who served during the Second World War or in Korea.

### Personnel Records – Winnipeg

- Processes formal and informal access and privacy requests for restricted personnel files of former federal public servants (FPS) and former members of the CAF who did not serve during the Second World War or in Korea.

### Indigenous Requests

- Processes formal and informal access and privacy requests on restricted GC archival records related to Indigenous communities and Indigenous subject matter, including requests for disclosure pursuant to 8(2)(k) of the *Privacy Act*.

### Privacy Management

- Provides advice on the management and protection of personal information to ensure that the organization complies with the *Privacy Act* and TBS policy requirements.
- Performs privacy impact assessments and guides business owners through the privacy breach management process.

- Develops policies and procedures to ensure that LAC ATIP meets the legislative and policy reporting requirements of the *Privacy Act* and its related regulations as well as TBS policies and the direction of the OPC.

### **Operations Support Division** (44.13 FTEs during the reporting period)

#### Triage and Registration

- Assesses and registers new incoming requests and responds to inquiries regarding the status of requests.
- Provides clerical support to the Branch's incoming and outgoing requests.
- Ensures internal circulation of boxes of documents or files to process and respond to ATIP requests.
- Sends communications and delivers release packages to requesters through different platforms.

#### Systems and Reporting

- Manages the institution's use of ATIP-specific software.
- Generates and analyzes statistical reports related to the Branch's work.
- Leads the development of a range of internal and external reports and dashboards.
- Supports the Branch with the development and implementation of internal technology solutions as ATIP Branch's key liaison with its Digital Services Sector.
- Coordinates the creation and publication of ATIP web pages and online tools.

#### Policies, Procedures and Workflows

- Reviews the implications of changes to TBS policies and notices on LAC's business.
- Coordinates and maintains the inventory of ATIP policies and procedures.
- Supports and develops new policies and procedures to increase efficiencies or respond to changing requirements.
- Refines tools to improve workflows for users and LAC employees.
- Consults with internal and external partners regarding policy and procedure changes.

#### Recruitment, Training and Development

- Coordinates hiring processes across the ATIP Branch and handles administrative tasks to initiate human resources actions.
- Develops and implements training programs to facilitate the onboarding of new employees.
- Provides internal training within LAC on ATIP responsibilities.
- Supports management in identifying the training needs to help facilitate each team's work.

### **Other supporting functions** (112.07 FTEs during the reporting period)

Since the majority of the historical records requested are in paper format, LAC ATIP Branch requires the support of additional teams within the organization to be able to fulfill its duties. Supporting functions provided by Research Support (14.934 FTEs), Circulation (9.147 FTEs), Digitization (20.967 FTEs), Regional Services (4.645 FTEs), government archivists (16.992 FTEs) and other staff from the Collections Sector (7.893 FTEs) were essential to the processing of ATIP requests.

During the reporting period, the ATIP Branch continued to require external support to meet the expanded operational needs arising from the temporary funding provided in response to the OIC systemic investigation.

The ATIP Branch also required support from LAC's corporate functions such as human resources, finance, real properties, policy and strategic support, communications, information technologies, information management and web (37.492 FTEs).

### **Service agreements**

LAC was not party to any service agreements under section 73.1 of the *Privacy Act* during the reporting period.

### **Delegation order**

For the purposes of the Act, the Minister of Canadian Identity and Culture and Minister responsible for Official Languages (formerly the Minister of Canadian Heritage), delegates their powers, authorities and responsibilities to LAC, who is then accountable for developing, coordinating and implementing effective policies, guidelines, systems and procedures. This delegation order ensures that the Minister's responsibilities under the Act are met and that information is processed and disclosed appropriately.

At LAC, the Minister delegates their powers, authorities and responsibilities to

- the Librarian and Archivist of Canada
- the Assistant Deputy Minister, Collections;
- the Director General, ATIP Branch;
- the directors in the ATIP Branch;
- the managers and team leads in the ATIP Branch;
- the ATIP analysts and officers, and archivists in the ATIP Branch.

The delegation order effective during the first part of 2024–2025 was issued by the Minister of Canadian Heritage to LAC in May 2016. During the reporting period, LAC reviewed its delegation order to align with its new ATIP Branch structure and to ensure effective delegation for its functions and requirements. The new simplified instrument, which was signed in August 2024, enables the delegation of actions to appropriate lower levels within the organization using a risk-based approach, promoting greater efficiency and quicker response time. The delegation order is currently being implemented. A copy can be found in the appendix of this report.

## Types of requests processed under the *Privacy Act*

LAC has a distinct role in making accessible the historical government records of over 300 current and previously existing federal organizations. LAC is therefore the main channel to provide access to billions of pages of archival government records.

LAC's collections of records are stored at its facilities in the National Capital Region, Renfrew, Winnipeg and Vancouver.

### **Government records**

All government records deemed to have enduring historical (archival) value are transferred to LAC after they are no longer needed for operational purposes in the institution that created them. LAC thus collects, preserves and provides access to historical records created by the various departments and agencies of the federal government. The material in the collection amounts to over 250 linear kilometres of textual, cartographic, photographic, audiovisual and digital records dating back to 1867. The majority of these records are not openly available as they might contain sensitive or personal information that must be reviewed in accordance with ATIP legislation.

Requests to access historical records are typically large in scope and complex, as they often comprise multiple voluminous files. In addition, as LAC is not the creator of these records, it may need to consult with the originating institution prior to releasing information, which can result in longer processing time.

### **Files of former CAF members and former FPS**

LAC holds and preserves 4.85 million personnel files of former CAF members and former FPS. Many of these files are semi-active, meaning they continue to be consulted for ongoing programs and benefits.

The control and supervision of the War Records Division of Veterans Affairs Canada (VAC) and all its records were transferred to LAC in accordance with Order in Council P.C. 1971–1989. Since 1971, LAC has worked with the relevant institutions (DND, VAC and Public Services and Procurement Canada) to provide necessary access to these records. Most of the ATI and privacy requests received each year by LAC are to access the military personnel files of former members of the CAF. These include:

- Canadian Forces regular force members (1919 to 1997);
- Canadian Forces reserve force members (1919 to 2007); and
- Newfoundland Militia members who served in the Second World War.

LAC also processes requests for the medical or dental records of CAF regular and reserve members who were released from service more than five years ago or who died in service more than five years ago.

In addition, LAC holds the dormant records of former FPS that were transferred to LAC prior to July 2017. These records are held until a public servant becomes 80 years old, at which time that individual's records can be destroyed. However, due to a litigation hold currently in place, no records are being destroyed at this time. Since July 2017, LAC no longer accepts the personnel files of former FPS for long-term retention. This is aligned with LAC's mandate to acquire and preserve

records deemed to have archival value. Personnel records of former CAF members may be stored at LAC while awaiting the end of the retention period, after which they transfer to permanent or archival status. FPS records are not deemed to have archival value and can be destroyed under certain conditions once the retention period has been met, and barring any active litigation holds. As the personnel files of all CAF members will become archival, LAC will continue to receive them in perpetuity.

### **LAC operational records**

While the overwhelming majority of LAC's ATIP workload relates to its unique role in providing access to restricted archival records created by other GC institutions, LAC ATIP also has responsibilities relating to LAC's own operations as an institution of the GC. These responsibilities include processing requests for records created by LAC itself or by its predecessor institutions, the National Library or National Archives, ensuring that LAC is meeting its responsibilities under the Act (including privacy regulations, policies and directives) and providing ATIP subject-matter expertise to support responses to parliamentary questions.

### **Formal and informal privacy request processes**

Formal requests are those officially made under the *Privacy Act*. A response is required within 30 calendar days of the date the request was received by LAC, unless LAC invokes a one-time 30-day extension (section 15 of the Act). Requesters are entitled to make a formal complaint about the processing time of their request to the Office of the Privacy Commissioner at any time during or after the processing of their request.

Informal requests are not covered under the Act but are reviewed in the spirit of the Act. There are no legislated timelines for informal requests, and there is no recourse or complaint mechanism. The number and dates of requests received and the complexity of each request determine the time frames for completing informal requests.

LAC processes both formal and informal requests. Both processes require a page-by-page review of records by an ATIP analyst.

**Table 1: Types of records processed under the *Privacy Act* in 2024–2025**

Type of record	Type of request	Requests outstanding from previous reporting periods	Requests received	Requests completed	Requests carried over to next reporting period within legislated timelines	Requests carried over to next reporting period beyond legislated timelines	Total requests carried over to next reporting period
Personnel files of former CAF members and former FPS	Formal	317	2,376	2,294	330	71	401
	Informal	2	2	4	0	0	0
	<b>Total</b>	<b>319</b>	<b>2,378</b>	<b>2,298</b>	<b>330</b>	<b>71</b>	<b>401</b>
GC archival records	Formal	28	339	188	163	16	179
	Informal	0	0	0	0	0	0
	<b>Total</b>	<b>28</b>	<b>339</b>	<b>188</b>	<b>163</b>	<b>16</b>	<b>179</b>
LAC operational records	Formal	0	8	3	5	0	5
	Informal	0	0	0	0	0	0
	<b>Total</b>	<b>0</b>	<b>8</b>	<b>3</b>	<b>5</b>	<b>0</b>	<b>5</b>
Grand total (all types of records)	Formal	345	2,723	2,485	498	87	585
	Informal	2	2	4	0	0	0
	<b>Total</b>	<b>347</b>	<b>2,725</b>	<b>2,489</b>	<b>498</b>	<b>87</b>	<b>585</b>

## Interpretation of the statistical report on the *Privacy Act*

All statistics included in these reports are representative of the most current data available to LAC at the time of writing the 2024–2025 Privacy Annual Report.

### Informal requests processed under the *Privacy Act*

During the 2024–2025 fiscal year, LAC received two informal privacy requests—both of which were for the personnel files of former CAF members and former FPS—compared to 304 in 2023–2024.

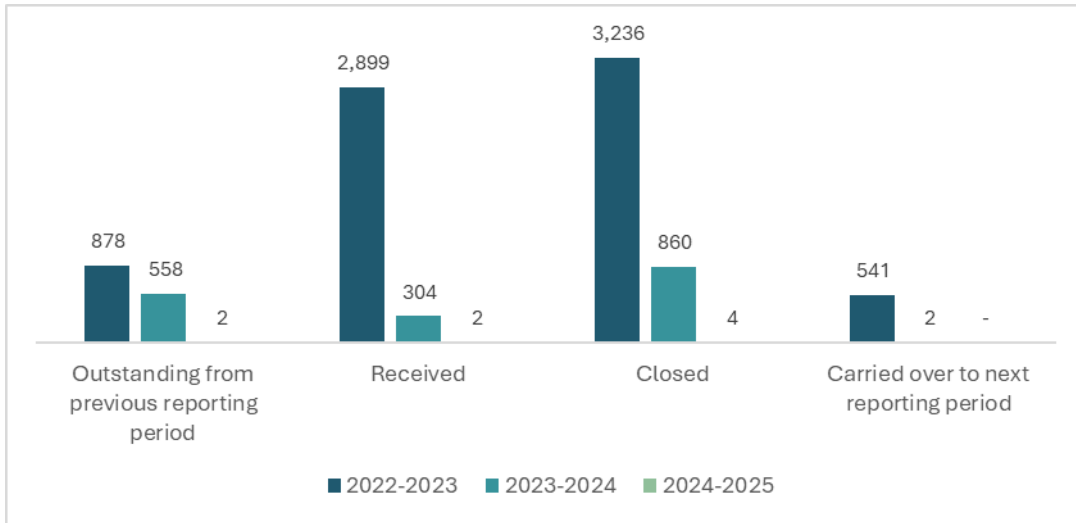
Throughout the reporting period, LAC responded to four informal privacy requests, compared to 860 in 2023–2024.

At the end of the reporting period, LAC had no outstanding informal privacy requests and, consequently, did not carry over any requests into the 2025–2026 fiscal year.

The decrease in the number of informal privacy requests received and completed in 2024–2025 may be a result of the [CAF-DND Sexual Misconduct Class Action Settlement](#) coming to an end during the previous fiscal year, as the last claims were accepted in February 2023.

The following figure provides a three-year overview of informal Privacy requests at LAC.

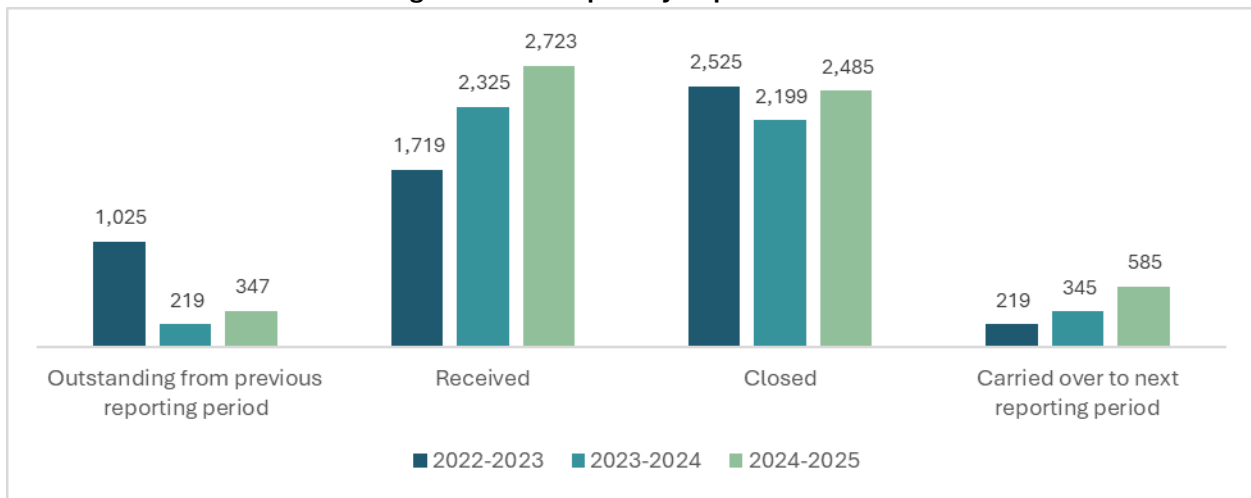
**Figure 2: Informal privacy requests trends**



**Formal Requests processed under the *Privacy Act***

The following figure provides a three-year overview of formal Privacy requests at LAC.

**Figure 3: Formal privacy requests trends**



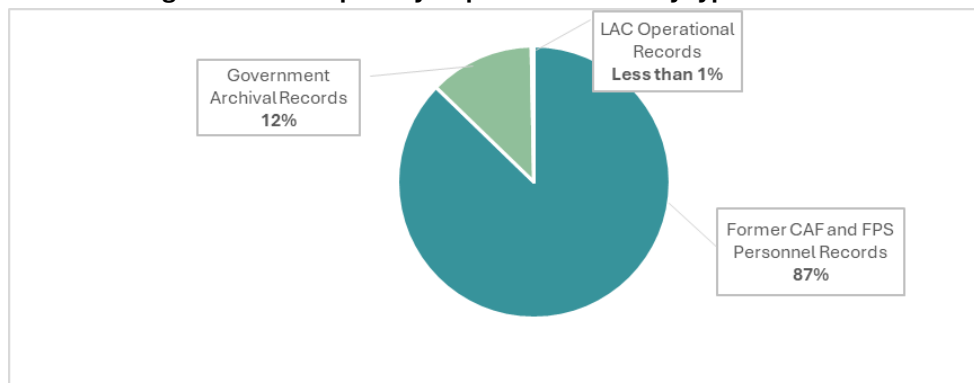
## Formal privacy requests received

During the 2024–2025 fiscal year, LAC received a total of 2,723 formal privacy requests:

- 2,376 (87%) related to personnel files, compared to 2,264 in 2023–2024;
- 339 (12%) related to GC archival records, compared to 60 in 2023–2024;
- 8 (less than 1%) related to LAC’s own operational records, compared to one in 2023–2024.

Compared to the previous year, LAC saw an increase of 17% in the number of formal privacy requests received (2,723 compared to 2,325 in 2023–2024).

**Figure 4: Formal privacy requests received by type of record**



## Formal privacy requests completed

In 2024–2025, LAC completed 2,485 formal privacy requests:

- 2,294 (92%) related to personnel files, compared to 2,099 in 2023–2024;
- 188 (8%) related to GC archival records, compared to 98 in 2023–2024;
- 3 (less than 1%) related to LAC’s own operational records, compared to 2 in 2023–2024.

This represents an increase of 13% in completed formal privacy requests over the previous fiscal year, in which LAC responded to 2,199 formal privacy requests. This increase is the result of LAC’s ongoing efforts to put release packages into clients’ hands sooner and expand its capacity to manage ATIP requests efficiently.

The following table provides information on disclosure for formal privacy requests completed during 2024–2025.

**Table 2: Disposition of privacy formal requests**

Disposition of requests	Total
All disclosed	432 (17%)
Disclosed in part	1,439 (58%)
All exempted	1 (0%)
All excluded	0 (0%)
No records exist	248 (10%)
Request abandoned	365 (15%)
Neither confirmed nor denied	0 (0%)
<b>Total</b>	<b>2,485</b>

### Requests closed within legislated timelines

In 2024–2025, LAC completed 90% (2,226 of 2,485) of formal privacy requests within legislated timelines. This represents an increase of 18% from 2023–2024, when 1,589 of 2,199 requests (72%) were completed within the legislated timelines.

### Progress made on requests closed beyond legislated timelines (including any extensions taken)

Of the 259 requests closed beyond legislated timelines, 89% (231) exceeded timelines, including additional extensions taken, and 11% (28) exceeded timelines where no extension was taken.

The following table provides information on the completion time for formal privacy requests completed during 2024–2025.

**Table 3: Completion time for formal privacy requests**

Number of days	Requests completed within legislated timelines	Requests completed beyond legislated timelines	Total requests completed
0 to 15 days	944	0	944 (38%)
16 to 30 days	477	0	477 (19%)
31 to 60 days	804	17	822 (33%)
61 to 120 days	0	232	232 (9%)
121 to 180 days	0	1	1 (0%)
181 to 365 days	0	4	4 (0%)
More than 365 days	0	5	5 (0%)
<b>Total</b>	<b>2,225</b>	<b>259</b>	<b>2,485</b>

### Other complexities

Over the past fiscal year, LAC dedicated significant resources to fulfilling an unexpected access to information request related to the disclosure of the Deschênes Part II Report, from the [Commission of Inquiry on War Criminals 1985-1986](#). The nature and complexity of the request required the work of approximately 50 employees from across the organization. Consequently, during the processing of this request LAC needed to adjust priorities, resulting in delays in addressing the backlog of overdue requests, implementing new policies and procedures and responding to new requests. procedures and responding to new requests.

A unique challenge for LAC lies in the nature of the collection: it is primarily composed of physical, analog records—original source materials that were not born digital and have never been digitized. These billions of pages, originating from over 300 government institutions, exist in a wide variety of formats and are dispersed across multiple storage facilities nationwide. Every time an ATI or privacy request is received, a complex process begins: records must be identified, physically located, transported and digitized before any review or disclosure work can even start.

Adding to this complexity is the fact that many records are poorly described—or not described at all—making them difficult to locate without the specialized knowledge of LAC archivists. The situation is further complicated by preservation requirements: some documents, due to their age

and fragility, are stored in climate-controlled environments and must be handled with exceptional care. In certain cases, records require mould remediation before digitization can occur—a necessary but time-consuming step.

After the relevant records have been retrieved and physically prepared (bindings removed, etc.), they are digitized. The speed at which materials are digitized depends on their physical state (fragile or stable), their physical size and the effort required to ensure images are captured clearly to be uploaded and processed in the ATIP redaction software. All these activities must occur before an ATIP analyst begins to review the digitized material for release.

Other sources of complexity for LAC are requests for documents for which it must seek legal advice and documents which contain personal information about more than one individual (e.g., medical or psychological records or records that contain listings of individuals).

### Extensions

In 2024–2025, LAC invoked 1,028 extensions of 30 days under paragraph 15(a)(i) (Interference with operations) and two extensions of 30 days under paragraph 15(a)(ii) (Consultation).

**Table 4: Length of extensions**

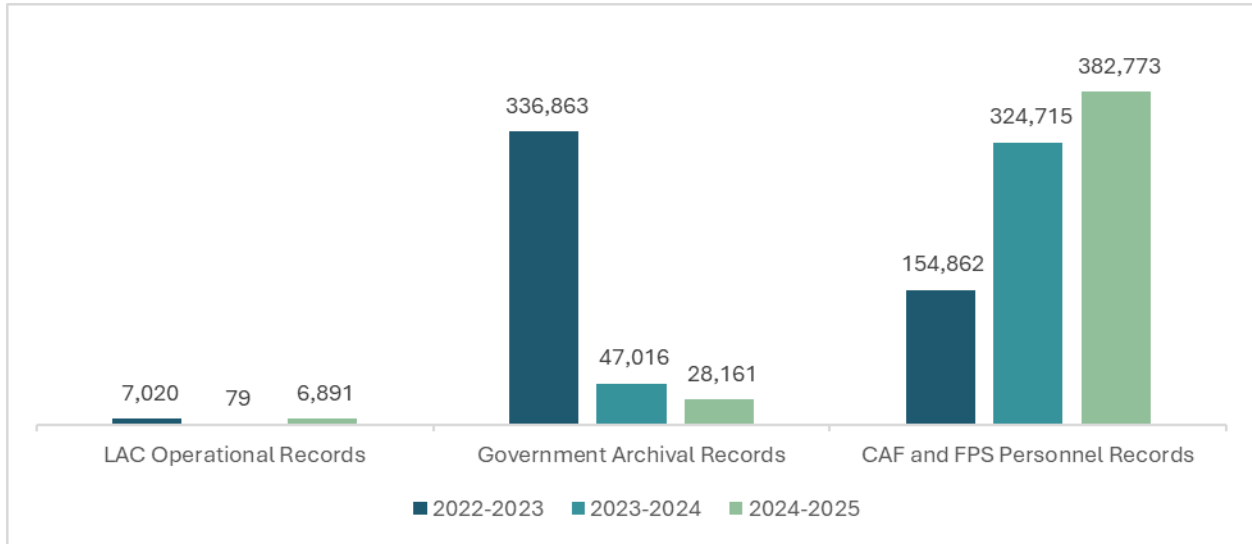
Length of extension	15(a)(i) Interference with operations				15(a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidences (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	1,028	1	70	1	0	2	0	0
<b>Total</b>	<b>1,028</b>	<b>1</b>	<b>70</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>

### Pages reviewed and released under formal privacy requests

LAC reviewed 417,825 pages pursuant to formal privacy requests in 2024-2025, compared to 371,810 in 2023–2024, an increase of 12%.

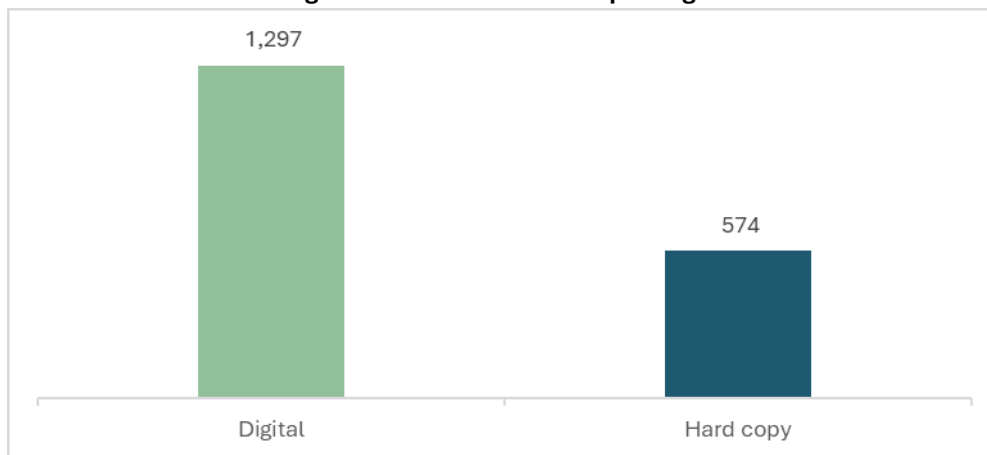
The following chart provides the total number of pages reviewed by type of record within LAC’s collections.

**Figure 5: Formal privacy requests: pages reviewed by type of record**



LAC continues to promote digital delivery, but requesters may request paper copies of the requested records. In addition, LAC continued to offer its clients the ability to consult original records on site at its facilities in the National Capital Region, Winnipeg, and Vancouver.

**Figure 6: Format of release packages**



**Formal privacy requests carried over to next reporting period**

At the end of the reporting period, LAC carried over a total of 585 formal privacy requests compared to 345 requests carried over in 2024-2025. LAC has also received 17% more privacy requests compared to the last fiscal year and closed 13% more requests. In addition, a larger number of the requests were completed within statutory timelines (90% compared to 72%). The temporary funding LAC received to increase its capacity to respond to ATI and privacy requests significantly contributed to these results.

**Table 5: Requests carried over to next reporting period, broken down by reporting period received**

Reporting period requests carried over were received	Requests carried over that were within legislated timelines as of March 31, 2025	Requests carried over that were beyond legislated timelines as of March 31, 2025	Total
2024-25	497	76	573
2023-24	1	1	2
2022-23	0	5	5
2021-22	0	5	5
2020-21 or earlier	0	0	0
<b>Total</b>	<b>498</b>	<b>87</b>	<b>585</b>

### Reasons for not meeting legislated timelines

All 259 requests closed as “deemed refusals”, because they did not meet legislated timelines, were due to the large number of requests to be processed, a high volume of records being requested, or other ATIP-related tasks.

**Table 6: Reasons for deemed refusals**

Reason for deemed refusals	Total
Interference with operations/workload	259
External consultation	0
Internal consultation	0
Other	0
<p>Note: An institution calculates deemed refusals once the request is closed. In some cases, the deemed refusals pertain to requests that were carried over from the previous fiscal year.</p>	

### Disclosures under subsection 8(2) and 8(5) of the *Privacy Act*

During 2024–2025, LAC completed 116 requests for disclosures under subsection 8(2) of the Act. Of these requests, 69 were disclosed either fully or in part, and 47 were either abandoned by the applicant or no records existed.

LAC disclosed personal information in 10 cases in accordance with paragraph 8(2)(e), which provides access of personal information to an investigative body specified for the purpose of enforcing any law of Canada or a province or carrying out a lawful investigation, if the request specifies the purpose and describes the personal information to be disclosed.

LAC also released personal information in 36 instances in accordance with paragraph 8(2)(k) of the Act, which stipulates that information could be released to an individual or a body acting on behalf of an Indigenous community for the purpose of researching and validating a land claim or grievance.

What follows is a summary of all of LAC’s disclosures of personal information under subsection 8(2) of the Act.

**Table 7: Disclosures of personal information under subsection 8(2) and 8(5) of the *Privacy Act***

Subsection	Number of disclosures
s.8(2)(a)	2
s.8(2)(b)	0
s.8(2)(c)	2
s.8(2)(d)	20
s.8(2)(e)	10
s.8(2)(f)	0
s.8(2)(g)	0
s.8(2)(j)	0
s.8(2)(k)	36
s.8(2)(m)	2
<b>Total</b>	<b>69</b>

**Requests for correction and personal information and notations**

During 2024–2025, LAC received no requests to correct personal information.

**Consultations from other Government of Canada institutions and other organizations**

In 2024–2025, LAC received and completed no requests for consultation from other institutions within the GC, nor from any other organizations, in connection with privacy requests.

**Requests for translation**

LAC did not translate any documents from English to French or from French to English in 2024–2025.

**Investigations**

LAC carried over two open complaints with the OPC from the previous reporting period.

In 2024-2025, LAC received two notices of intention to investigate from the OPC, and four complaints were resolved.

At the end of the reporting period, LAC had no active complaints with the OPC.

**Non-material privacy breaches**

A total of 31 non-material privacy breaches and privacy incidents occurred during the reporting period.

## Resources related to the *Privacy Act*

In addition to the activities undertaken by LAC's ATIP Branch, it is important to recognize the essential support provided by staff throughout the institution—such as archivists and employees in the front-line public service area of Research Support and the behind-the-scenes areas of Circulation, Preservation, Digitization, Translation, Information Technologies and Web Publishing—who contributed significantly to the ATI and privacy functions and helped ensure LAC's compliance with the *Access to Information Act*, the *Privacy Act* and related policies.

At the end of the reporting period, 190.995 full-time equivalents were performing work associated to the application of the acts across the institution. This is significant given that the institution's total number of employees in 2024–2025 was 1,201 FTEs, meaning that 16% were involved in ensuring the processing of ATI and privacy requests.

Additional resources from outside the ATIP Branch continued to be necessary to support the expanded operational requirements resulting from the temporary funding received following the OIC systemic investigation. These resources included expenditures on professional services contracts for digital services, such as procuring additional secure workstations and implementing new information technologies.

LAC's additional temporary funding helped reduce the number of requests carried over to 2024–2025 by 34%. This substantive decrease demonstrates LAC's efforts to improve its capacity and its ability to meet the annual volume of incoming requests. This multi-year temporary investment of resources will allow LAC to reduce and ultimately eliminate its backlog of overdue requests and to meet the volume of incoming requests annually, including supporting responses to GC class action litigation that arrive through the ATIP channel.

## Training and awareness

During the reporting period, LAC's Privacy Management Team (PMT) provided English and French training sessions to employees. A total of 369 employees attended the official training sessions on the topics of Privacy 101, Privacy Breaches, and Introduction to Privacy Risk Assessment. Three different training modules on the same topics were also provided to employees.

Through the course of the past fiscal year, the PMT also hosted two events, Data Privacy Day and Privacy Awareness Week to help raise awareness regarding the importance of privacy and establish best practices throughout organization. These events included the published Intranet articles, training sessions, and social activities aimed at reinforcing best practices for privacy.

Coordination of training and recruitment for the ATIP Branch is centralized within the ATIP Recruitment, Training and Development Team. During 2024-2025, the Branch onboarded new employees and students and reached out to an Indigenous community to improve Indigenous workforce representation at LAC. Furthermore, the Branch standardized staffing documents while finalizing supporting documents for the Career Development Program for ATIP analysts at LAC, including performance assessment templates and training and development guides. The Branch also facilitated the enrolment of selected LAC ATIP staff to the ATIP Training Program with the Association of Access to Information and Privacy Professionals.

Moreover, the ATIP Branch collaborated with other areas within LAC to provide basic training materials to new ATIP staff on how to navigate archival records and resources available at LAC. The Branch also created internal training microlearning courses tailored specifically for LAC ATIP staff. These courses cover a broad range of topics, including international requesters, key dates, client codes for personnel records, required documents for ATIP requests and searching in the Military and Government Personnel Information Index. The courses are designed to ensure that staff have access to thorough and up-to-date learning resources and can be used as reference tools as they are easily accessible.

LAC also continued to offer both group and ATIP Branch-specific training sessions to its staff. Nine presentations highlighting the work of various teams within the ATIP Branch were delivered to a broad LAC audience, enhancing staff understanding of the diverse roles and responsibilities within LAC ATIP. These sessions promote collaboration and keep employees informed about the overall operations of the ATIP Branch, including significant changes.

Towards the end of the fiscal year, training was provided to prepare for the implementation of the new case management software, ATIPXpress. A total of fourteen training sessions about various workflows and functionalities were offered and were specifically tailored to the role of each team. Individual and group question and answer sessions were also organized, as needed. The Branch also created a hub in its collaborative portal where all the procedures are readily available for staff to use.

## Policies, guidelines and procedures

In fiscal year 2024-2025, LAC has been revising its privacy policy suite. The objectives of this policy suite are to implement the following:

- Policy on privacy management
- Standard on the management of personal information
- Standard on the disclosure of personal information
- Standard on privacy impact assessments
- Procedures on privacy breaches

To avoid the excessive and unnecessary collection of personal information, LAC has proactively reviewed its practices related to the collection of personal data during the processing of requests.

During fiscal year 24-25, LAC developed a new Procedure for the Public Interest Disclosure of Personal Information Pursuant to 8(2)(m)(i) of the Privacy Act. The development was informed by consultations with other Government of Canada institutions, including examples of such procedures developed within other institutions. LAC also conducted targeted stakeholder consultations with specific interest groups including ATI and Privacy experts from across Canada, representatives from provincial and territorial archives across Canada, and historians. The new procedure provides guidance to LAC when considering potential disclosures of archival records and includes for consideration the mandatory factors: government transparency and accountability, passage of time, probability and degree of consequence. It also includes additional optional factors: urgency of public interest, expectations of the individual, sensitivity of personal information and extent of disclosure – depth.

# Initiatives and projects to improve privacy awareness/management

## Activities conducted by the Privacy Management Team

In the 2024-2025 reporting period, the PMT has continued to provide advice, training, and breach management services to LAC. The PMT has continued refining and improving its services by updating its suite of templates, procedures and workflows, as well as overarching policies. It also completed 95 requests for advisory services.

This latter service includes requests related to:

- Reviewing new policies, procedures, and projects that deal with personal information;
- The disclosure of personal information through ATIP requests;
- Interpretation of the *Privacy Act*;
- Privacy notice statements;
- Information sharing agreements; and
- Consent statements.

The team also provided advice on multiple projects for the potential opening of archival records in LAC's collection, in particular a grouping focused on releasing military personnel records outside of the ATIP process. The Korean War Killed in Action (KIA) and Historical Military Personnel Records projects are exploring options to consider opening large segments of military personnel records outside of the formal ATIP request process, just as LAC does with other archival records in its collection through Proactive Access (Block Review) procedures. These records are in extremely high demand for LAC's clients conducting genealogy research and represent a considerable portion of LAC's ATIP requests as they contain a wealth of personal information. The PMT advised on best practices in handling this personal information on the basis of analyses of the risks of potential harm to concerned individuals.

During the reporting period, the PMT has completed seven preliminary risk checklists for various initiatives, programs, projects, activities, and services undertaken at LAC to ensure compliance with the *Privacy Act*, *Directives on Privacy Practices*, and *Privacy Regulations*.

## Other initiatives

Created in 2023, the Archival Research Team at LAC continued producing research reports to help analysts make informed decisions about the release of information, with the goal of reducing or eliminating the need for consultation with other institutions and to inform LAC on the analysis and disclosure of potentially sensitive information (personal or access related). In 2024-2025, over 300 research reports were created, and consequently LAC saw a decrease of 86% in the number of consultations required on military and intelligence subjects, excluding consultations with the Canadian Security Intelligence Service. Out of 140 requests closed on military and intelligence subjects that would normally have required consultation to obtain subject matter expertise from the originating institution, 121 no longer required external consultation. Through the course of the year, the work of the Archival Research Team has become an integral up-front part of the ATIP analysis process. The quality and effectiveness of the research reports enabled LAC to assert its

delegated authority under ATI and privacy in a responsible and informed manner and to provide quicker responses to clients.

LAC continues to play an active role in the reviews of the *Access to Information Act* and the *Privacy Act*, working closely with the Treasury Board Secretariat and federal partners. This collaboration ensures LAC's archival expertise and mandate—to preserve and provide access to government records—are reflected in policy updates that balance transparency with the protection of personal information. As co-lead of an interdepartmental working group on the complaints process, LAC also contributed to broader ATIP system improvements. In parallel, LAC supported discussions on declassification strategies and Indigenous data sovereignty initiatives.

LAC has held regular meetings with the National Centre for Truth and Reconciliation to explore ways to connect data related to Indigenous requests between both of their websites and to promote the sharing of best practices and tools. LAC also continued meetings with the National Claims Research Directors to engage with them and to advise them of new ATIP processes and LAC's progress in tackling overdue requests and keeping up with ongoing volume.

### **LGBT Purge Fourth Supplementary Settlement Agreement**

During the last reporting period, LAC completed its portion of the ATIP-informed work related to the LGBT Purge Fourth Supplementary Settlement Agreement, marking a key milestone in this significant initiative. Working in collaboration with other government institutions, LAC reviewed approximately 11,000 pages of material. This effort underscored a strong commitment to transparency, accountability and the preservation and sharing of historical records that document the experiences of 2SLGBTQI+ individuals within the federal public service and the Canadian Armed Forces.

### **Technology-Related initiatives**

Through the course of the fiscal year, LAC completed the configuration of its new case management system, ATIPXpress, on the Protected B network. LAC began registering and processing new incoming requests using ATIPXpress as of April 1, 2025.

LAC also expanded its secure network infrastructure, improving its ability to manage digital and digitized sensitive and classified records more efficiently. These upgrades ensured that requests involving Secret and Top Secret information were handled in a more timely manner while ensuring full compliance with Government of Canada security standards. The strengthened secure network capacity also enabled more efficient secure communication and collaboration with other government institutions on matters involving classified records.

## **Summary of key issues and action taken on complaints**

LAC remains committed to actively addressing the complaints it receives while maintaining a collaborative relationship with the OPC. It also remains actively engaged with TBS and other federal institutions to improve the ATIP system, serving as co-lead of an interdepartmental working group focused on enhancing the complaints management process.

At the end of the reporting period, LAC had no open complaints with the OPC compared to two in 2023–2024.

## Material privacy breaches

During 2024–2025, LAC did not have any material privacy breaches.

## Privacy impact assessments

In 2024–2025, LAC did not complete any new privacy impact assessments. LAC is currently working on revising or completing PIAs for all of LAC’s programs and activities that include the collection, use and/or management of personal information.

## Public interest disclosures

During the reporting period, LAC disclosed personal information twice in response to requests in accordance with paragraph 8(2)(m) of the Act, whereby the head of the institution is of the opinion that the disclosure of personal information is considered to be in the public interest. In both instances, the disclosures were to help identify the heirs of deceased individuals. After conducting related reviews, LAC concluded that it should disclose the personal information (name, address and contact information of family members) because the disclosure outweighed any invasion of privacy and the potential heirs would benefit from the release of their personal information. In both cases, the OPC was notified prior to the disclosure of the information.

## Monitoring compliance

In fiscal year 2024–2025, LAC continued to monitor the time taken to process privacy requests through its specialized ATIP software AccessPro Case Management (APCM). This software enabled LAC to track all activities related to requests (e.g., time management, correspondence and consultations) and allowed each activity to be reported on with specific timelines.

LAC maintained its efforts to monitor data integrity through comprehensive monthly reviews conducted by a system specialist, which facilitated compliance with applicable regulations, policies and procedures as well as accurate reporting. Managers and team leads used automated dashboards to assess their teams’ workloads and to track the timeliness of the completion of requests. Branch management meetings regularly reviewed and discussed the overall workload to facilitate improvements in completion times. Additional tools such as dashboards, system-designed reports and search builders were available to all users, allowing them to track all active and closed requests for accuracy and completeness.

# Appendix

## Delegation Order – *Privacy Act*

*Delegation Order pursuant to the Access to Information Act and Privacy Act  
Arrêté de délégation en vertu de la Loi sur l'accès à l'information et la  
Loi sur la protection des renseignements personnels*

As head of Library and Archives Canada (LAC) for the purposes of the *Access to Information Act* (ATIA) and the *Privacy Act* (PA), the Minister of Canadian Heritage, pursuant to subsections 95(1) of the ATIA and 73(1) of the PA, delegates the following powers, duties and functions under these Acts to the persons holding the LAC positions set out in the schedule hereto, as well as to the persons occupying those positions on an acting basis. This delegation order replaces any previous delegation order.

À titre de responsable de Bibliothèque et Archives Canada (BAC) pour les fins de la *Loi sur l'accès à l'information* (LAI) et de la *Loi sur la protection des renseignements personnels* (LPRP), le ministre du Patrimoine canadien, en vertu des paragraphes 95(1) de la LAI et 73(1) de la LPRP, délègue les attributions suivantes sous ces lois aux titulaires des postes au sein de BAC mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes. Le présent arrêté de délégation remplace tout arrêté de délégation antérieur.

Schedule / Annexe

Positions / Postes	<i>Access to Information Act</i> and Regulations / <i>Loi sur l'accès à l'information</i> et règlements	<i>Privacy Act</i> and Regulations / <i>Loi sur la protection des renseignements personnels</i> et règlements
<ul style="list-style-type: none"> <li>▪ Librarian and Archivist of Canada / Bibliothécaire et archiviste du Canada</li> <li>▪ Assistant Deputy Minister, Collections / Sous-ministre adjoint, Collections</li> <li>▪ Access to Information and Privacy (ATIP) Coordinator / Coordonnateur de l'accès à l'information et de la protection des renseignements personnels (AIPRP)</li> <li>▪ Director, ATIP Branch / Directeur, direction générale de l'AIPRP</li> <li>▪ Manager, ATIP / Gestionnaire, AIPRP</li> </ul>	<p><b>Full authority / Autorité absolue</b> (including for the Act as it was prior to June 21, 2019 / incluant la Loi telle qu'elle existait avant le 21 juin 2019)</p>	<p><b>Full authority / Autorité absolue</b></p>
<ul style="list-style-type: none"> <li>▪ Team Lead, ATIP / Chef d'équipe, AIPRP</li> <li>▪ Senior Analyst, ATIP / Analyste principal, AIPRP</li> <li>▪ Analyst, ATIP / Analyste, AIPRP</li> <li>▪ Junior Analyst, ATIP / Analyste junior, AIPRP</li> <li>▪ Senior Lead Archivist / Archiviste principal en chef</li> <li>▪ Lead Archivist / Archiviste en chef</li> <li>▪ Senior Archivist / Archiviste principal</li> <li>▪ Archivist/Archiviste</li> </ul>	<p><b>Full Authority, except for paragraphs 12(2)(b) and 12(3)(b) of the Act / Autorité absolue, à l'exception des alinéas 12(2)(b) et 12(3)(b) de la Loi</b> (including for the Act as it was prior to June 21, 2019 / incluant la Loi telle qu'elle existait avant le 21 juin 2019)</p>	<p><b>Authority for sections 18 to 37 of the Act and subsection 72(1) of the Act / Autorité pour les articles 18 à 37 de la Loi et le paragraphe 72(1) de la Loi</b></p>
<ul style="list-style-type: none"> <li>▪ Junior Officer, ATIP / Agent junior, AIPRP</li> </ul>	<p><b>Authority for subsection 19(1) of the Act / Autorité pour le paragraphe 19(1) de la Loi</b> (including for the Act as it was prior to June 21, 2019 / incluant la Loi telle qu'elle existait avant le 21 juin 2019)</p>	<p><b>Authority for section 26 of the Act / Autorité pour l'article 26 de la Loi</b></p>

Dated, at the City of Ottawa, this 16 day of the month of August, 2024.      Daté, en la ville de Ottawa, ce 16 jour du mois de août, 2024.



The Honourable Pascale St-Onge, Minister of Canadian Heritage  
L'honorable Pascale St-Onge, ministre du Patrimoine canadien