



Commission des champs  
de bataille nationaux

The National Battlefields  
Commission



# 2024–25 Annual Report

on the *Access to Information Act*

**National Battlefields Commission**

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## **2024–25 ANNUAL REPORT** **ON THE ACCESS TO INFORMATION ACT**

### **INTRODUCTION**

With the goal of increasing government transparency and accountability to the public, the *Access to Information Act* allows Canadians to request access to government records, subject to specific and limited exceptions set out in the Act.

The National Battlefields Commission (NBC) is an institution subject to the *Access to Information Act* and must, pursuant to section 94 of said Act, submit an annual report on the application of the *Access to Information Act* for tabling in Parliament.

Located in Québec City, the NBC was created in 1908 under *An Act Respecting the National Battlefields at Quebec, S.C. 1908, c. 57*. As part of its mandate to preserve, conserve and enhance Battlefields Park, it is responsible for the administration and stewardship of the park, as well as managing the funds allocated to it for this purpose. The NBC is an agency of the Government of Canada and is part of the Canadian Heritage portfolio.

The NBC does not have any non-operating subsidiaries.

### **ORGANIZATIONAL STRUCTURE**

The NBC receives requests relating to the *Access to Information Act* from the online system provided for this purpose. The NBC may occasionally receive informal access-to-information requests via email. All requests are followed up by the Institutional Affairs team, which informs the acting secretary & CEO and the relevant teams as necessary. The assistant director of Institutional Affairs ensures that requests are processed within the time limits prescribed by the Act.

There is no Access to Information and Privacy (ATIP) Office within the NBC, as it is a small organization.

The NBC has not entered into any agreement for the provision of services with another institution as outlined in Section 96 of the *Access to Information Act*.



Once access-to-information requests are completed, the Institutional Affairs team is responsible for coordinating the monthly publication, with support from the Marketing and Development department for online posting.

The NBC's chief financial officer is responsible for ensuring that any proactive publication pursuant to Part 2 of the Act meets the applicable requirements.

### DESIGNATION ORDER

The organization's acting secretary and CEO has full authority to administer the *Access to Information Act*. This person has not delegated their authority and responsibilities under the Act.

### 2024–25 PERFORMANCE UNDER PART 1 OF THE ACCESS TO INFORMATION ACT

For the reporting period in question, i.e., from April 1, 2024, to March 31, 2025, the NBC received and processed only one formal request under the *Access to Information Act*. This request was responded to within 28 days and included the processing and electronic transmission of 159 pages. Thus, the percentage of official requests answered in the fiscal year is 100%. For this official request, the documents were "disclosed in part," since the exceptions of Sections 19 (1), 21 (1) c) and d) and 23 were invoked. No institutions requested consultations with the NBC.

The NBC also received and processed nine (9) informal requests during the period.

No requests or complaints were active on the last day of the period covered.

### TRAINING AND AWARENESS-RAISING

NBC staff members did not receive any *Access to Information Act* training in 2024–25.

### POLICIES, GUIDELINES AND PROCEDURES

No new policies, guidelines or procedures relating to access to information were implemented by the NBC during the period covered by this report.

### INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION

The ad hoc and disparate nature of the access-to-information requests received in recent years did not suggest any similarities that would enable the information requested to be grouped together or made available to the public by other means.



Consequently, the NBC did not implement any new access-to-information initiatives or projects during the period covered by this report.

**SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS**

The NBC did not receive any complaints pertaining to access to information during the period covered by this report.

**PROACTIVE PUBLICATION UNDER PART 2 OF THE ACCESS TO INFORMATION ACT (AIA)**

The NBC is designated as a government institution in Schedule II of the *Financial Administration Act*.

Legislative requirement	AIA section	Publication schedule	Does this requirement apply to your institution? (Y or N)	Groups or internal positions responsible for meeting the requirement	Percentage of proactive publication requirements met within the timeframes prescribed by the Act	Link to publication web page**
<b>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	Y	Finance	50%	<a href="#">Government Travel Expenses</a>
Hospitality expenses	83	Within 30 days after the end of the month of reimbursement	Y	Finance	50%	<a href="#">Hospitality Expenses</a>
Reports tabled in Parliament	84	Within 30 days after tabling	Y	Finance, Acting Secretary & CEO	100%	<a href="#">Plans, Reports and Policies – The National Battlefields Commission – Canada.ca</a>
<b>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 end of the quarter	Y	Finance and Procurement	0%	<a href="#">Search Government Contracts Over</a>



		Q4: Within 60 days after the end of the quarter				<u>\$10,000</u>
Grants and contributions over \$25,000	87	Within 30 days after the end of the quarter	N	N/A	N/A	N/A
Package of briefing materials prepared for new deputy heads or equivalent	88(a)	Within 120 days after appointment	N	N/A	N/A	N/A
Titles and reference numbers of memoranda prepared for a deputy head or equivalent and received by their office	88(b)	Within 30 days after the end of the month of receipt	N	N/A	N/A	N/A
Package of briefing materials prepared for the appearance of a deputy head or equivalent before a committee of Parliament	88(c)	Within 120 days after appearance	N	N/A	N/A	N/A
<b>Government institutions that are departments listed in Schedule I of the <i>Financial Administration Act</i> or branches of the core public administration listed in Schedule IV of that Act (i.e., government institutions for which the Treasury Board Secretariat is the employer)</b>						
Reclassification of positions	85	Within 30 days after the end of the quarter	N	N/A	N/A	N/A
<b>Ministerial offices (any institution that publishes proactively on behalf of a minister's office)</b>						



Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	N	N/A	N/A	N/A
Titles and reference numbers of memoranda prepared by a government institution for the minister and received by the minister's office	74(b)	Within 30 days after the end of the month of receipt	N	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 the last sitting day of the House of Commons in June and December	N	N/A	N/A	N/A
Package of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament	74(d)	Within 120 days after appearance	N	N/A	N/A	N/A



Travel expenses	75	Within 30 days after the end of the month of repayment	N	N/A	N/A	N/A
Hospitality expenses	76	Within 30 days after the end of the month of repayment	N	N/A	N/A	N/A
Contracts over \$10,000	77	Q1-3: Within 30 days after the end of the quarter Q4: Within 60 days after the end of the quarter	N	N/A	N/A	N/A
Minister's office expense report Note: This consolidated report is currently published by the TBS on behalf of all institutions.	78	Within 120 days after the end of the fiscal year	N	N/A	N/A	N/A

\*When counting proactive publication requirements, monthly or quarterly reports are considered a single publication.

\*\*More specifically, the specific page where this information can be found on [open.canada.ca/en](http://open.canada.ca/en) or on the institution's website.



In light of the results presented in the preceding table, the NBC intends to review its internal processes to ensure its compliance with the prescribed deadlines for proactive disclosure requirements. However, some of the delays in 2024–25 were caused by the learning curve involved with new financial software. The work will be completed as soon as possible.

Access-to-information requests completed by the NBC are published here on a monthly basis by the Institutional Affairs team in collaboration with the Marketing and Development team: [Completed Access to Information Requests | Open Government – Government of Canada](#)

### COMPLIANCE MONITORING

The team responsible for managing agreements is trained in the legal and ethical obligations relating to access-to-information, to ensure constant vigilance in this respect. Most NBC contracts and agreements include specific clauses on access to information, protection of personal information and confidentiality. These clauses are drawn up in compliance with the *Access to Information Act*. In addition, on the organization's website, a privacy notice summarizes the NBC's privacy practices for online activities, in accordance with the *Privacy Act*: [Notices & Privacy Policies – Plains of Abraham](#).

When the NBC receives an access-to-information request, the assistant director of Institutional Affairs is immediately informed, and they ensure that the request is processed within the allotted time, by monitoring progress on the file on a weekly basis. The acting secretary & CEO is also informed of the request and of the ensuing follow-up at every step of its processing. Constant vigilance was exercised over the period covered by this report.

Before information is shared, a risk assessment is carried out on the confidentiality, integrity and accessibility of the information, including an analysis of the impact on the public's right of access to information.

No inter-institutional consultations were required during the period.

It is the responsibility of the NBC chief financial officer to ensure compliance with proactive disclosure requirements and data accuracy under Part 2 of the *Access to Information Act*.