



Independent Review of the Policy on Service and Digital

Final Report

Prepared for the Treasury Board of Canada Secretariat

Supplier: Goss Gilroy Inc.

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Examen indépendant de la Politique sur les services et le numérique.

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Note to Readers:

This public opinion research (POR) report was developed with reference to a report originally created by Goss Gilroy Inc. (GGI) as a foundational source. Portions of this POR report were drawn or adapted from the GGI report; however, this document was not produced in its entirety by GGI.

EXECUTIVE SUMMARY

The *Policy on Service and Digital* (PSD) came into force in April 2020, replacing several policy instruments. Since its introduction, there have been many changes to the context within which the policy operates. Goss Gilroy Inc. (GGI) was hired by the Treasury Board of Canada Secretariat (TBS) to conduct an independent review of the PSD to inform future policy development (contract value \$39,908.78). The review explored three areas: implementation; relevance and coherence; and effectiveness. To carry out the review, GGI conducted a document review, interviews, and focus groups and a survey with departments and agencies. Survey data was validated and cleaned and analyzed using simple frequencies and cross-tabulations. Analysis of recurring themes and unique insights was also carried out on open-ended responses.

The survey link was open to ensure broad engagement; therefore, a full response rate could not be ascertained. Employees and supervisors, selected through non-probability sampling, participated in the survey. While the findings may not fully capture every segment of the federal digital and service community, they provide a reliable and well-founded representation of stakeholder perspectives. The 518 responses provide sufficient data to identify meaningful themes and patterns, particularly when triangulated with other lines of evidence (document review, interviews, focus groups).

The review found that the PSD's requirements, roles and responsibilities and accountabilities are not clear to many consulted for the review. There is a gap between policy intent and operational execution. Reporting requirements are also not clear, considered burdensome by many, and not meeting the needs of the Office of the Chief Information Officer (OCIO) of Canada or other users within departments and agencies. Departments and agencies need more support from TBS for policy implementation. Moreover, the policy is not well-aligned with the Treasury Board (TB) Policy Suite and, while there are few direct contradictions between policies, there is uncertainty regarding which requirements in different policies should take precedence. Outcome achievement at the enterprise level has been modest at best, although departments and agencies feel they are making progress within their organizations.

The review findings suggest a number of considerations moving forward. A couple of these considerations focus on the service area, seeking a greater balance between service and digital and service-oriented integrated governance. More clarity should be provided with regards to roles, responsibilities and accountabilities. Outcomes should be measurable and supported with relevant data collection.

Additionally, the review found that an update of the PSD should be more than a series of incremental changes and instead be a significant redesign. As well, the future policy should be updated regularly and consistent with other policies as they are introduced/updated. The future policy should also leverage best practices in policy design, focusing on principles with practical guardrails. TBS should ensure that departments and agencies are well-supported, following change management best practices. Finally, a policy enforcement strategy should be developed that takes into account the different contexts and capacities of those implementing the policy.

Background

The PSD came into force in April 2020, effectively replacing several policy instruments: the *Policy Framework on Information and Technology*, the *Policy on Management of Information Technology*, the *Policy on Information Management*, the *Policy on Service*, the *Policy on Acceptable Network and Device Use*, the *Directive on Management of Information Technology*, the *Directive on Information Management Roles and Responsibilities*, and, the *Directive on Recordkeeping*.

The original and still relevant intent was to integrate to increase coherence, but this objective has not been met sufficiently. Change in technology and society is fast paced, and after 5 years, the policy is obsolete in many ways. Digital, data, and technology environments are moving faster than the current policy framework. When the rules fall behind the reality, departments and agencies face real risks: unclear guidance, increased cybersecurity vulnerabilities, slower procurement and delivery, and growing gaps between Canada's practices and those of its international peers. Pausing or waiting would simply extend those risks.

Key things have been identified to help this policy suite set up government to enable better programs and services in a digital era:

1. Clarify accountabilities and authorities
2. Measure and reduce administrative burden
3. Commit to data and digital public infrastructure

Additionally, and in accordance with the Digital Ambition and Digital Standards, the Digital Policy Division at the OCIO of Canada is seeking to make policy development more agile and effective. Policy makers should be able to react quickly and efficiently to a rapidly changing environment. When a crisis arises, the policy response should be agile and quick.

In a digital era, government programs and services should be easy to use, secure and trustworthy, and underpinned by enabling policies and processes, common technology

components, data as infrastructure and an implementation-literate workforce. The policy and its supporting instruments should provide practical guidance and guardrails for public employees and contractors on how to approach and use technology in ways that build trust and improve service delivery to people.

Research purpose and objectives

GGI conducted an independent review of the PSD and supporting instruments to assess its impact on the Government of Canada's (GC) client-centric service design and delivery, enabled by technology and data.

The review addressed three main areas:

1. Implementation Analysis

- Examine the implementation process of the PSD across government departments and agencies
- Identify factors that facilitated or hindered achievement of policy goals related to client service experience and government operations

2. Policy Overlap and Confusion

- Investigate how the PSD interacts with other policies within the TB Policy Suite
- Investigate how departments/agencies created their own department-specific policies on top of the existing TB Policy Suite
- Identify areas where the PSD overlaps with other policies and resulting confusion or conflicts

3. Policy Effectiveness and Compliance

- Analyze the policy's effectiveness and compliance with current strategy
- Conduct root cause analysis, identify gaps and areas for improvement
- Understand stakeholder perspectives on the policy's effectiveness and areas for improvement

Summary of key findings

Implementation Clarity

- **About half of survey respondents** agreed that the PSD is clear in terms of requirements, roles and responsibilities, and accountabilities
- **One-quarter** agreed the PSD and its objectives, accountabilities, roles and responsibilities are not clear

Reporting Requirements

- **26%** of respondents indicated reporting requirements are not clear
- **24%** indicated reporting requirements are not reasonable
- Reporting described as:
 - Outdated
 - Particularly challenging for small organizations
 - Duplicative of other policy requirements
 - Low strategic value to both departments and OCIO

TBS Support

- Survey results showed **no positive signal** around TBS support for policy implementation
- **Around half** of respondents felt neutrally about TBS's helpfulness
- Only **around one-third** found TBS tools and policy guidance helpful
- Only **around one-quarter** found overall support (26.4%) and trainings/workshops (25.4%) helpful
- **42.9%** of respondents had outstanding questions about how their organization is supposed to implement the PSD

Policy Alignment and Overlap

- **One-third (34%)** agreed that distinctions between the PSD and other TB policies are not clear
- **One-third (32%)** stated their organization has additional policies/guidelines relating to service and digital beyond the PSD
- **26%** of those agreed there are contradictions or duplication between organizational policies and the PSD

Survey Methodology

The survey was launched on October 1, 2025, in both official languages and in accessible format using GGI's secure Voxco online survey platform and closed on October 27, 2025. Most of the survey questions were closed-ended. All survey participants were informed that their answers would be treated confidentially and that responses using the open link would be anonymous.

An English version of the questionnaire was programmed and tested first to ensure the survey was functioning as intended. Subsequently, the survey was translated, programmed and validated for accuracy.

GGI sent targeted invitations to 168 Chief Information Officer (CIO) and Designated Senior Official (DSO) community members for which valid email addresses were received from OCIO. After the initial invitation, three reminders were issued via email, one each week. An open link was also developed and shared by OCIO so that others from the digital and service community could participate.

Including surveys that were completed up to the final close-ended question, a total of 518 completed surveys were submitted, with 71 from email invitation to the CIO/DSO community (14% of all responses), and 447 from the open link (86%). The CIO/DSO community response rate was 42% (i.e., 71/168).

Once the survey data was validated and cleaned, GGI prepared simple frequencies and a series of cross-tabulations. An analysis of recurring themes and unique insights was also carried out with the open-ended responses. Results from the closed and open-ended questions were then organized by review question.

Profile of survey respondents

Tables 1 to 4 present a breakdown of the characteristics of the survey respondents.¹

Almost half of all survey respondents were from either Employment and Social Development Canada, TBS, or Public Services and Procurement Canada (Table 1). Similarly, almost half of all survey respondents had over ten years of employment with the federal government (Table 2).

Just under half (43%) of survey respondents indicated that they were in working level employment positions (Table 3). The remaining survey respondents' level of employment were almost evenly split between manager and senior level or above. Finally, there was a mix of survey respondents regarding their areas of work with Information Technology (IT)

¹ The total number of respondents does not add to 518, since some respondents preferred not to answer the question.

being the most common area and Access to Information and Privacy being the least common area.

Table 1: The top 10 departments and agencies among survey responses (N=344)

Department / Agency name	Total number of survey respondents	Proportion of total survey respondents
Employment and Social Development Canada (ESDC)	90	18%
Treasury Board of Canada Secretariat (TBS)	76	15%
Public Services and Procurement Canada (PSPC)	66	13%
Environment and Climate Change Canada (ECCC)	27	5%
Fisheries and Oceans Canada	22	4%
Natural Resources Canada (NRCan)	15	3%
Immigration, Refugees and Citizenship Canada	14	3%
Shared Services Canada	13	3%
Health Canada	11	2%
Agriculture and Agri-Food Canada	10	2%

Table 2: Years of employment in the federal government among survey responses (N=518)

Years of employment (Range)	Total number of survey respondents	Proportion of total survey respondents
Over 10 years	252	49%
2 to 5 years	131	26%
6 to 10 years	83	16%
Less than 2 years	44	9%

Table 3: Employment position level among survey responses (N=505)

Employment position level	Total number of survey respondents	Proportion of total survey respondents
Working level	216	43%
Senior and above	144	29%
Manager	128	25%
Other	17	3%

Table 4: Area of work among survey responses (N=934)²

Areas of work	Total number of survey respondents	Proportion of total survey respondents
Information Technology (IT)	238	47%
Data/Information Management	189	38%
Service design or delivery	158	31%
Policy	120	24%
Other (please specify)	111	22%
Cyber Security	75	15%
Access to Information and Privacy	43	9%

Limitations and mitigation strategies

Because the survey link was open, GGI could not determine a full response rate (i.e., beyond the invited CIOs/DSOs). While the survey was intended for public servants working primarily in digital and service functions, the total size of that population across government is not known. Nevertheless, 447 completed surveys provide a sufficient number of responses to provide a basis for identifying themes, findings, and considerations.

There was a lack of performance data available for the review upon which to assess the effectiveness of the PSD. Instead, the review team accessed MAF and DRR results, as well as evidence from the interviews, focus groups and survey administered for the review.

The survey findings presented in this report were collected through a mixed-distribution methodology combining targeted invitations to a defined group of CIOs and DSOs, and an open, unprompted link shared broadly across the digital and service community of the GC. A total of 518 completed surveys were received.

Because the majority of responses (86%, n=447) were collected through a non-probability, self-selected open link, and because the total size of the eligible population across the GC is not known, **the survey results are not statistically representative of the federal digital and service community as a whole.**

² Note: Participants could select more than one area of work. Percentages represent the proportion of participants who selected each area.

Accordingly:

- **No margin of error or confidence interval can be calculated or reported** for the findings derived from this survey.
- **Results cannot be generalized or projected** to the broader federal public service population.
- **Percentage figures cited throughout this report** reflect the views of survey respondents only and should not be interpreted as representative of all Government of Canada departments and agencies.
- The survey findings should be read as **directional and qualitative in nature**, providing insight into the range of perspectives and experiences among those who participated, rather than as a statistically precise measurement of opinion.

This survey is consistent with a structured stakeholder consultation exercise. Findings have been triangulated with other lines of evidence — including key informant (KI) interviews, focus groups, and document review — to inform the overall conclusions and considerations presented in this report.

How results were used

The survey results were used as **one of four primary data collection methods** in the comprehensive review of the PSD, alongside a document review, interviews with TBS personnel, and focus groups with departments and agencies that were part of a broader engagement activity.

Expected future use

The survey ultimately contributed to a comprehensive evidence base supporting the conclusion that the PSD requires substantial revision to improve clarity, coherence, effectiveness, and implementation support across the federal government.

POLITICAL NEUTRALITY CERTIFICATION

Political Neutrality Certification

I hereby certify as Senior Officer of [insert the name of the research firm] that the deliverables fully comply with the Government of Canada political neutrality requirements outlined in the Policy on Communications and Federal Identity and the Directive on the Management of Communications.

Specifically, the deliverables do not include information on electoral voting intentions, political party preferences, standings with the electorate, or ratings of the performance of a political party or its leaders.

Signed:

Sandy Moir Digitally signed by Sandy Moir
DN: cn=Sandy Moir, o=Goss Gilroy Inc.,
ou=Partner, email=smoir@ggi.ca, c=US
Date: 2026.03.17 11:44:10 -04'00'

Sandy Moir
Partner
Goss Gilroy Inc.

RESEARCH FINDINGS

This section presents the full research findings from the project. Findings are organized by review question across three thematic areas: Implementation, Relevance and Coherence, and Effectiveness.

SECTION 1: IMPLEMENTATION

Q1. To what extent has the PSD been appropriately implemented?

Summary

There are challenges with respect to the PSD's clarity. OCIO/TBS KIs and about half of survey respondents find the PSD to be clear. CIOs/DSOs and respondents with more familiarity with the PSD, and those working in organizations with higher digital and service maturity, were more likely to find the PSD to be clear. The issues with the PSD's clarity were frequently attributed to the high-level, complex nature of the policy.

Reporting is also unclear, burdensome, and yet current reporting is not delivering the expected strategic value for both OCIO and departments and agencies. There is a need for a reporting model that allows for an overall assessment of enterprise-wide performance. Departments and agencies are also interested in feedback on their implementation of the PSD and to benchmark themselves against other departments and agencies. Reporting also does not lead to sufficient accountability and enforcement of non-compliance. There is an appetite among respondents from departments and agencies for more consequences for organizations that do not meet the requirements in the PSD.

Finally, expectations of how the PSD is to be implemented at an enterprise level as well as within departments and agencies are not well understood. There is a gap between policy intent and operational execution and a large amount of disparity between departments and agencies in terms of how they have interpreted the policy.

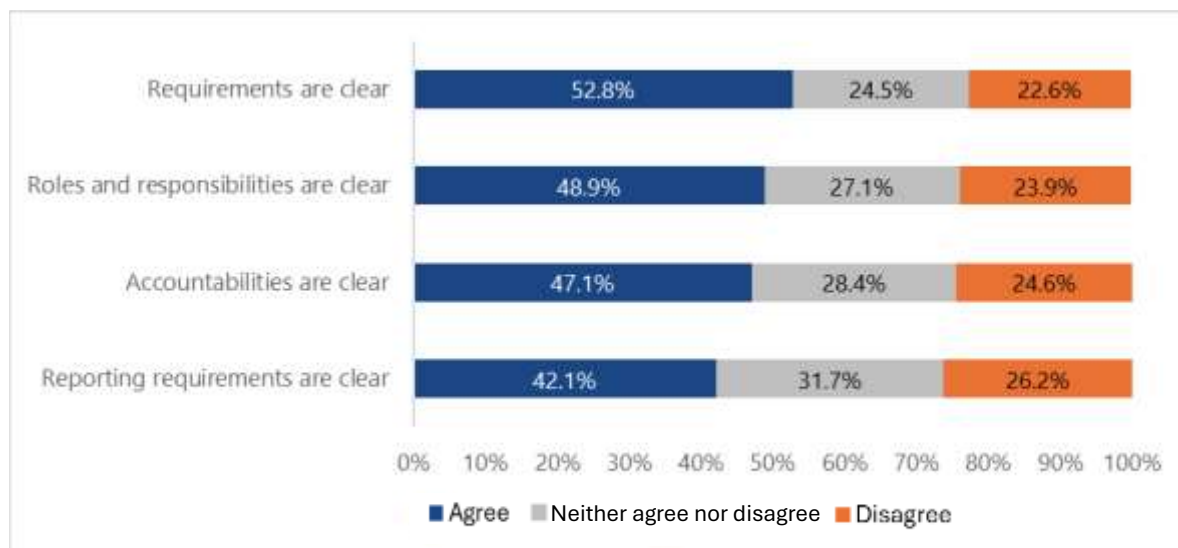
Clarity of PSD Requirements, Accountabilities, Roles and Responsibilities

The PSD and the Directive on Service and Digital specify a number of key responsibilities and associated roles that deliver on the objectives and expected results, including the Secretary of TBS, the CIO of Canada, Deputy Heads (DHs) of key government organizations; and departmental CIOs and DSOs, and for cyber security officials, respectively.³

Documents reviewed highlight a lack of clear expectations or defined responsibilities, accountabilities and authorities,⁴ particularly for TBS authorities (CIO, Chief Human Resources Officer, Comptroller General) and deputy heads and enterprise implementation leads (SSC, PSPC, ESDC, Justice Canada).⁵

Views across interviewed OCIO and TBS representatives, surveyed departments and agencies and focus groups participants were mixed regarding the clarity of the PSD. KIs and survey respondents thought the policy was unclear, whereas focus group participants were more likely to say it is clear.

Figure 1: Percentage of survey respondents agreeing/disagreeing with respect to the clarity of the PSD (n=473–477)



³ Performance Measurement Framework for the PSD 2022-07-04 Draft 8 – appendix A review (unpublished.)

⁴ Policy Paper 1 Breaking the Legacy Loop – A New Architecture for Digital Government (unpublished.)

⁵ Service and Digital Policy and Performance 2024–2025 (unpublished.)

Figure 1 long description

Survey statement	Agree (%)	Neither agree nor disagree (%)	Disagree (%)
Requirements are clear	52.8	24.5	22.6
Roles and responsibilities are clear	48.9	27.1	23.9
Accountabilities are clear	47.1	28.4	24.6
Reporting requirements are clear	42.1	31.7	26.2

As demonstrated in Figure 1 above, about half of survey respondents agreed that the PSD is clear in terms of requirements, roles and responsibilities, and accountabilities. Those who were more likely to say that the PSD is clear include CIOs/DSOs, senior managers, respondents working in cyber security, and respondents working in organizations with higher digital and service maturity. Respondents who were not familiar were less likely to agree the requirements are clear.

Conversely, about a quarter of survey respondents and the majority of OCIO and TBS KIs agreed that the PSD and its objectives, accountabilities, roles and responsibilities are not clear, particularly as it relates to specific roles or subject areas (including service), authorities (e.g., TBS), relationships and the Internal Enterprise Service Organization (IESO) role. Other elements of feedback also include difficulty navigating the PSD to identify roles and responsibilities, and the PSD not having evolved to reflect changes in the wider GC, nor reflecting organizational differences in departments and agencies, including small agencies in particular.

Clarity of Reporting Requirements

About a quarter of survey respondents noted that reporting requirements are not clear (26%, see Figure 1 above) and not reasonable (24%). Respondents who were senior managers, working in Access to Information, and in organizations with higher digital and service maturity were more likely to say reporting requirements were clear and reasonable. Focus group participants echoed these concerns regarding reporting.

Both focus group participants and survey respondents highlighted there is a lack of guidance for departments to understand the applicability of different requirements to their contexts (e.g., in regulatory departments, or relating to internal vs. external services) as well as the expectations regarding reporting confidential information. In addition, respondents across all lines of evidence described the reporting requirements as outdated, particularly challenging for small organizations with limited capacity, and duplicative of reporting requirements for other policies and directives,

such as the Policy on Results. For example, a few focus group participants noted providing three slightly different sets of service standard data every quarter. Documentation also describes reporting and performance measurement of the PSD as administratively heavy due to its emphasis of “compliance over impact.”

Despite the extensive requirements for reporting by departments and agencies, there are concerns (expressed by both reporting organizations and OCIO) relating to the value of what is reported and how non-compliance is addressed. The data that is collected and reported was described by survey respondents as being of low strategic value to departments and agencies and OCIO, as it is collected in silos and prioritizes tracking of activity over assessment of delivery of value.⁶ It also does not provide an overall assessment of enterprise-wide performance and policy compliance nor does it allow departments to benchmark their progress relative to their peers (which could be provided through direct feedback from TBS or by self-assessing with publicly available dashboards).

Enforcement of Non-Compliance

According to some respondents across all lines of evidence, information provided through reporting does not lead to sufficient accountability and enforcement in cases of non-compliance with the PSD. However, two initiatives were seen as improvements in assessing policy compliance. First, the Risk and Compliance Process, which aims to strengthen accountability and ensure compliance with TBS policies, provide DHs with insights into obligations set out in policies and legislation, and take corrective actions when necessary.⁷ Second, the Enterprise Health Approach (EHA) is an adaptive oversight model that integrates quarterly performance dashboards, structured bilateral discussions, and capacity assessments across service, talent, technology, and data. It focuses on a list of high-impact, high-risk services, which is reviewed annually to ensure continued relevance. The EHA promotes a more coherent, enterprise-wide view of service health by providing timely signals—such as changes in volume, service standards, backlogs, and client feedback—to inform where strategic attention or cross-departmental collaboration may be needed.

Nonetheless, overall, departments and agencies would still like to see a policy with more teeth to enforce mandatory requirements. Among KIs and focus group participants, only cyber is viewed as having strong enforcement and consequences. Some KIs noted that having more publicly accessible data (e.g., published on the Open Government Portal) would also support compliance due to limited TBS capacity to be the responsible party with respect to enforcement. Conversely, some OCIO/TBS and departments/agencies representatives mentioned they would like to see greater flexibility with respect to enforcement.

Areas for Improvement and Lessons Learned

Overall, the PSD is described in program documents and interviews as a patchwork of requirements leading to fragmented digital initiatives and siloed approaches to service delivery. Expectations of how the PSD is to be implemented at an enterprise level as well as within departments and agencies are not well understood. As a result, there is a definite gap between

⁶ Policy Paper 3 A New Service Measurement Framework for Impact (unpublished).

⁷ Treasury Board of Canada Secretariat (May 12, 2025). *Enterprise Health Approach – For Information to DM Digital and DM Services*. [PowerPoint slides] (unpublished).

policy intent and operational execution and a large amount of disparity between departments and agencies in terms of how they have interpreted and consequently implemented the policy.

A policy paper developed by OCIO highlighted opportunities to strengthen the policy relating to its structure, scope, integration with other instruments, digital standards, roles and accountability, oversight approach, support for digital leadership, and alignment with modern delivery.⁸ For example, shortcomings with respect to the PSD's performance measurement have made it difficult to assess progress towards outcomes, including a lack of coordination across OCIO in the design and development of relevant and integrated performance measurement for all subject areas; and lack of integrated data on GC Data/Information Management, as compared to the available inventories for GC Services and GC Applications.⁹

Lessons learned have also been identified specifically with respect to the PSD's administrative burden, which include overly lengthy processes, over-reliance on creating mandatory and prescriptive policy instruments instead of other interventions, insufficient use of TB assigned responsibilities to the CIO to nimbly respond to policy issues, and internally reviewing policies on an ongoing basis to ensure relevance.¹⁰ KIs from both OCIO and TBS also suggested that more work could have been done during implementation to improve alignment of the PSD with other policies and within the PSD itself, which amalgamated a number of different policies into one. In addition, although some OCIO KIs described collaboration within TBS as effective on a day-to-day basis, KIs also highlighted siloes within TBS as a result of its governance structure, which hinders the meaningful engagement and collaboration necessary for effective implementation of the PSD. According to KIs, this can damage the relationship between OCIO and departments and agencies. For example, some KIs noted OCIO could do more to leverage in-house talent with deep legislative experience (e.g., with the Privy Council Office) given the PSD's intersections with topics or challenges requiring policy and legislative changes.

Q2. How can TBS support departments and agencies in policy implementation going forward?

Summary

Departments and agencies are in need of more support from TBS in their implementation of the PSD. Tools, policy guidance, support, trainings and workshops were not found to be particularly helpful or impactful, because they were not accessed (due to low awareness or other reasons) or not sufficiently targeted.

Findings

Evidence from both the focus groups and survey of departments and agencies does not point to a positive signal around the type of support they are receiving from TBS to enable a successful implementation of the policy. Altogether, around half of surveyed respondents felt neutrally with

⁸ Policy Paper 1 Breaking the Legacy Loop – A New Architecture for Digital Government (unpublished).

⁹ PMF for PSD 2022-07-04 Draft 8 – appendix A review

¹⁰ Service and Digital Policy and Performance 2024–2025

respect to the usefulness of TBS's helpfulness (including support, tools, policy guidance, trainings and workshops), suggesting that these were not impactful enough to have made a strong impression on departments and agencies.

Just over one-third of surveyed respondents believed TBS tools and policy guidance to be helpful. Perception of overall support and trainings and workshops was more divided where only around one-quarter of respondents found these to be helpful (26.4% and 25.4%, respectively) and a similar proportion disagreed they were helpful (27.1% and 20.1% respectively) (see Figure 2).

By respondent type, CIOs/DSOs, senior managers, respondents working in Cyber Security and those in organizations with higher digital and service maturity were more positive about the support from TBS. Respondents working in Service Design and Delivery and those with no familiarity with the PSD were more likely to disagree that TBS support was appropriate.

Figure 2: Degree to which TBS support is helpful, according to survey respondents, by type of support (n=338–418)

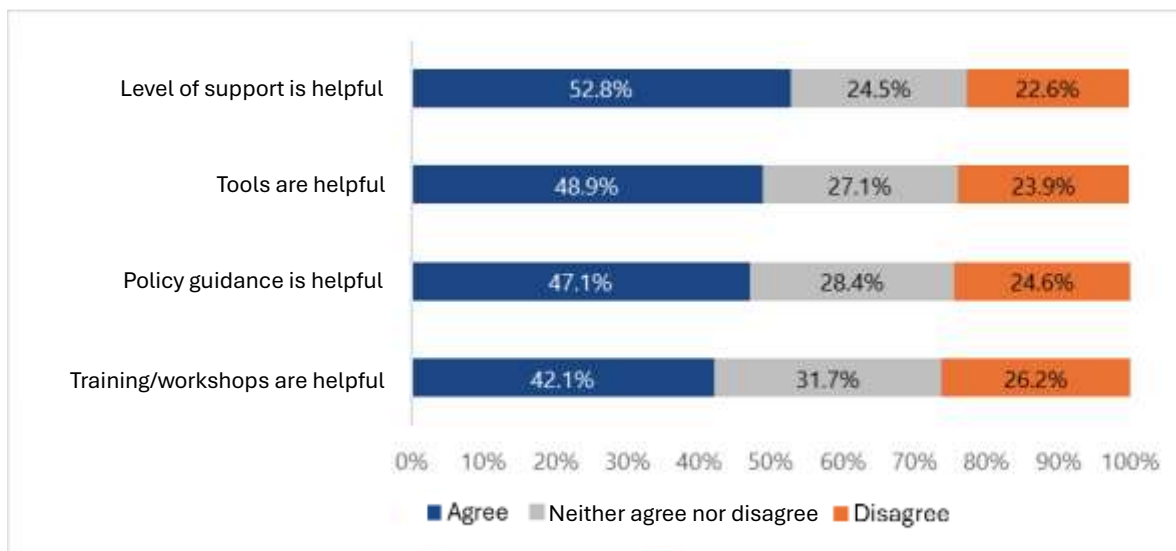


Figure 2 long description

Survey statement	Agree (%)	Neither agree nor disagree (%)	Disagree (%)
Level of support is helpful	26.4	46.5	27.1
Tools are helpful	34.7	46.7	18.6

Policy guidance is helpful	36.1	42.6	21.3
Training/workshops are helpful	25.4	54.1	20.1

Specific feedback regarding TBS support was provided by focus group participants and survey respondents in an open-ended question when they disagreed with the above statements. In particular:

- Tools (templates, GCXchange site) were described as too high level and/or not tailored to the needs and realities of departments and agencies, including of small agencies.
- Many participants who did not find training to be helpful were unaware of the training opportunities available to them, or felt it was limited, not useful, or not sufficiently targeted.
- Many participants who did not find level of support and policy guidance to be helpful feel that support from TBS regarding the PSD had either never been provided, decreased after being initially implemented, and/or are in need of more support.
- According to the survey results, almost half (42.9%) of survey respondents said they have outstanding questions about how their organization is supposed to implement the PSD.

SECTION 2: RELEVANCE AND COHERENCE

Q3. To what extent does the PSD overlap with other policies within the TB Policy Suite or at departments and agencies?

Summary

Stakeholders reported that the PSD is not well-aligned with the broader TB Policy Suite. They described the suite as fragmented and difficult to navigate, with multiple policies addressing similar subject areas. This overlap does not generally result in direct contradictions between instruments; however, it creates uncertainty about how the PSD relates to other policies and which requirements should take precedence in practice.

Findings

Evidence from all lines of evidence demonstrate a general lack of alignment between the PSD and other TB policies as well as overlap, which program documentation attributes to the PSD's overall poor integration with the TB Policy Suite.¹¹ One-third of survey respondents (34%) either agree or completely agree that the distinctions between the PSD and other TB policies are not clear (particularly for CIOs/DSOs, respondents working in Cyber Security, those who are not familiar with the PSD, and those working in organizations with low digital and service maturity. Managers, however, were more likely to say the distinctions are clear.

¹¹ Policy Paper 1 Breaking the Legacy Loop – A New Architecture for Digital Government (unpublished).

Many consulted for the review highlighted a lack of alignment between the PSD and other policies and directives, as well as Acts, such as the Accessible Canada Act, the Policy on Communications and Federal Identity, and the Directive on Open Government, the latter of which was also identified as an area of overlap or contradiction in program documentation, along with the Directive on Automated Decision-Making.

Two specific areas showing lack of alignment between the PSD and the Policy on Communications and Federal Identity were identified by survey respondents. First, because requirements for web communications and services are split between the PSD and the Policy, IT developers will often only follow the former, and communications groups the latter, consequently missing design specifications outlined in the policy or developing web applications and content that do not follow the requirements of the PSD. Second, the absence of a requirement in the PSD for the CIO to include communications teams in planning, innovation and design results in their exclusion from the work of IT partners, resulting in accessibility and official language complaints. Both teams could instead be mandate in the PSDS to work together to mitigate issues up front, focus on client-centric principles (instead of solely on back-end simplicity) and identify solutions.

OCIO KIs and many surveyed departments and agencies also shared a perception of overlap between PSD and other policies and directives on specific topics. While survey respondents pointed to overlap with other policies on data, security, accessibility and privacy, TBS and OCIO KIs highlighted overlap with other TB policies specifically on the topics of security (pertaining to cyber), procurement (related to tensions between legacy systems, accessibility where there are rules in procurement versus principles in the PSD), financial management (pertaining to how funding flows in IT projects), investment management (pertaining to IT investments), and results (pertaining to reporting of service standards and enabling factors). Most TBS and OCIO KIs characterized the nature of the interaction between the PSD and other TB policies as “intersections” or “connections.”

While KIs and focus group participants did not identify contradictions between PSD and other TB policies, a few survey respondents did point to contradictions. Areas of contradiction identified include the Policy on Communications and Federal Identity (which views the web as a communications channel and not as part of the service delivery framework); cybersecurity requirements and the expectation and the use of open-source software; government procurement and requirements related to harmonization of digital standards to facilitate trade (pertaining to the use Findable, Accessible, Interoperable and Reusable (FAIR) data principles and obligations under international treaties); the PSD's client-centric focus and the Directive on the Management of Projects and Programmes' requirements for gated project delivery for digital services, which has impeded progress on product management, as digital products are frequently released without being gated to improve client's experience with digital service delivery; and the Policy on Planning and Management of Investments (pertaining to its requirement of long-term and high level of certainty in investment planning).

One-third of survey respondents (32%) stated that their organization has policies or guidelines relating to service and digital in addition to the PSD, and one-quarter (26%) of those agreed that there are contradictions or duplication between these and the PSD.

Due to the overlap in topics and the intersections described above, survey respondents explained that there is inconsistency in policy interpretation between departments and agencies, and that they frequently encounter difficulty determining which TB policy takes precedence in cases of overlap or contradictions. A few survey respondents also expressed the need for a mapping or crosswalk document to increase alignment between policies and directives.

Overall, there are also concerns across all lines of evidence that the broad TB Policy Suite is fragmented and difficult to navigate for public servants. While efforts are made to minimize overlap between TB policies, the result is a policy suite that is made up of many sets of requirements spread out over many instruments with little assistance for public servants to know what requirements apply to their job.

Q4. To what extent is the PSD aligned with emerging priorities and future trends in policy requirements and guidance?

Summary

The PSD would benefit from improved alignment of service and digital, with many recommending the former have a higher profile within the policy — i.e., digital positioned as an enabler of service. Furthermore, future policy design should offer flexibility and responsiveness, be principles-based, have clear and measurable goals, and clearly identify mandatory requirements.

Findings

When asked about the future of the policy, the most common feedback from KIs and focus group participants was about the visibility of the concept of service in the policy. Focus group participants in particular noted that the relationship between service and digital in the PSD is not consistent with their view that the service concept should have a higher profile than digital, whereas the PSD is believed to be heavily focused on digital. For example, referencing the relationship between both areas, one focus group participant stated that the meaning has been lost over the last few years of implementation. Another explained that through the PSD, OCIO has focused so much on data and AI that they have created an additional gap in service. TBS KIs also felt that the low number of requirements pertaining to service seemed counter to the objectives of the policy

Other Suggestions for Future Policy Direction

- Increased flexibility and responsiveness.
- Be principles-based and include enterprise and system-level outcomes, recognizing complex interdependencies.
- Identify achievable goals that are clear and measurable.
- If there are mandatory requirements, these should be clearly laid out and enforced.

SECTION 3: EFFECTIVENESS

Q5. To what extent has the PSD achieved its expected outcomes?

Summary

Qualitative evidence is mixed regarding the extent to which the PSD has achieved its four expected outcomes. While departments and agencies feel they are moving towards the achievement of outcomes, progress and outcome achievement is more limited at an enterprise-level. Key findings by outcome are:

- Modest progress is reported with respect to client-service design and delivery due to varying degrees of maturity across the enterprise and limited program interoperability.
- Modest progress is reported for integrated decision-making being supported by enterprise governance, planning and reporting. Though progress is reported with respect to IT, enterprise governance is lacking in the area of service, and the low strategic value of reporting is a barrier to integrated decision-making by limiting insight into enterprise-wide performance
- Modest progress has been made relating to technology- and data-enabled service delivery, business and program innovation as evidenced by some MAF and DRR targets having been met. However, there remains a critical need for transformation and modernization of the government's IT systems, and respondents agree that the PSD does not drive business and program innovation, and notes barriers to scaling of innovative approaches.
- There has been a low degree of progress towards workforce capacity and capability development. A serious need remains for investment in both hiring and skills development, particularly in non-IT functions.

Factors supporting the achievement of outcomes include (but not limited to) leadership from senior officials and information exchange opportunities and platforms. Factors hindering effectiveness include (but not limited to) weak accountability and enforcement, absence of a system view and siloed functions, fragmented policy architecture, and limited resources,

Outcome 1: Service Design and Delivery is Client-Centric by Design

According to the PSD, services must have comprehensive and transparent, publicly available client-centric standards and have performance information for all service delivery channels.¹² Interviewees and focus group participants noted that the PSD does support this outcome through the use of client feedback to improve service delivery and the requirement for an internal service strategy. However, government-wide progress towards this outcome has been limited, as evidenced in the 2022-23 government-wide MAF Report¹³ and 2023-24 TBS DRR¹⁴, due to mixed

¹² Treasury Board of Canada Secretariat (2023). [Management Accountability Framework 2022–23 government-wide report](#).

¹³ Treasury Board of Canada Secretariat. [Management Accountability Framework 2022–23](#).

¹⁴ Government of Canada. (2024). [Treasury Board of Canada Secretariat 2023–24 Departmental Results Report](#).

government-wide progress in service standard maturity, transparent and real-time performance reporting, review of service standards, online availability of services, and service review and improvement.

Progress has been made in some of these areas since the previous reporting cycle, though well under government-wide targets. As demonstrated in Figure 3 below, survey respondents also reported modest progress, with about half indicating that this outcome (52%) and the related outcome of improved services and government operations (49%) have been achieved to some or a large extent.

Figure 3: Survey respondent views on degree to which service design and delivery is client centric and PSD has improved services and government operations (n=424–427)

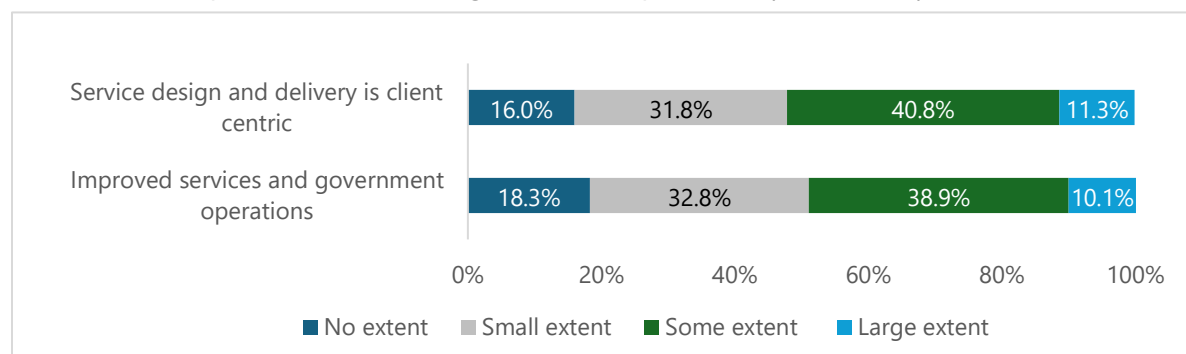


Figure 3 long description

Survey statement	No extent (%)	Small extent (%)	Some extent (%)	Large extent (%)
Service design and delivery is client-centric	16.0	31.8	40.8	11.3
Improved services and government operations	18.3	32.8	38.9	10.1

Outcome 2: Integrated Decision-Making is Supported by Enterprise Governance, Planning and Reporting

There is evidence from documents and survey respondents of progress towards this outcome. According to the 2022-23 government-wide MAF Report and 2023-24 TBS DRR, modest progress has been made with respect to IT, which the Directive on Service and Digital states departments are required to integrate into organizational business planning. For example, some progress has been made with respect to application portfolio health, IT planning maturity, and cloud maturity (though still below target), with further progress dependent on funding and investments and

overcoming data challenges.¹⁵ Survey respondents also reported some progress, with almost half (48%) indicating this outcome has been achieved to some or a large extent. (see Figure 4 below).

Figure 4: Survey respondent views on degree to which integrated decision-making is supported by enterprise governance, planning and reporting (n=420)

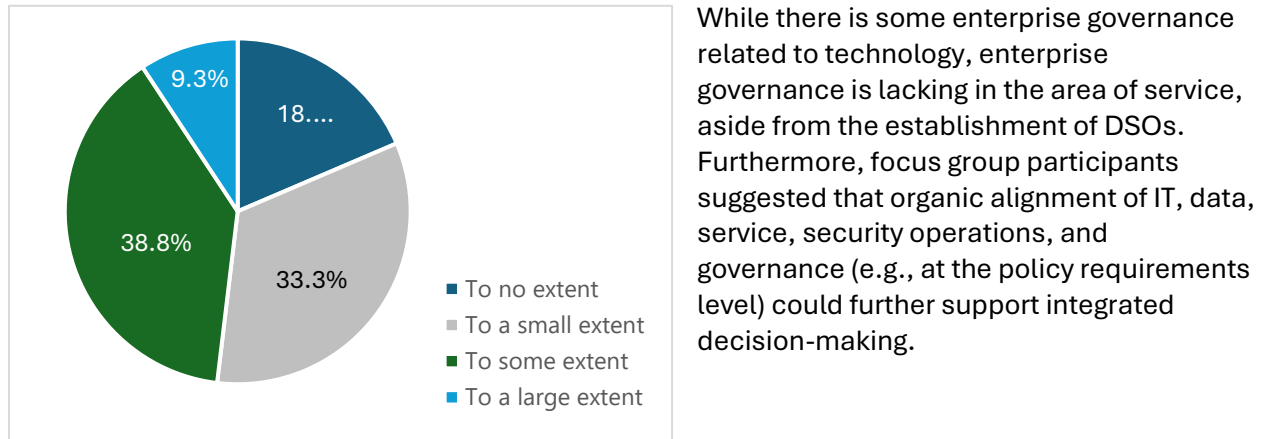


Figure 4 long description

To no extent (%)	18.6
To a small extent (%)	33.3
To some extent (%)	38.8
To a large extent (%)	9.3

While there is some enterprise governance related to technology, enterprise governance is lacking in the area of service, aside from the establishment of DSOs. Furthermore, focus group participants suggested that organic alignment of IT, data, service and security operations and governance could further support integrated decision-making.

Outcome 3: Service Delivery, Business and Program Innovation are Enabled by Technology and Data

Evidence from documents, survey respondents and focus group participants reveals this outcome has been achieved to some extent. While targets have been met across the enterprise with respect to two of three assessments related to data and information management—data transfer interoperability and sound management practices in organizations' data inventory—, low levels of enterprise maturity are noted with respect to use of standardized metadata in organizations' active systems, which increases the cost and time needed to manage data and find information. Some

¹⁵ Treasury Board of Canada Secretariat. *Management Accountability Framework 2022–23*.

TBS initiatives have also supported progress in technology and data across the enterprise, such as the development of a government-wide IT modernization strategy, funding departments through the Application Modernization Investment Fund, and leading communities of practice to help departments migrate to modern technologies, among others. Nonetheless, the critical need for transformation and modernization of the government’s IT systems to address risks to service delivery and slow progress towards this goal remain a regular point of external criticism and concern, namely, in a series of 2023 reports by the Auditor General of Canada^{16,17} and recent literature noting the absence within the federal government of a “credible or sufficiently resourced plan to adopt modern public digital infrastructure.”¹⁸

This theme of modest progress is consistent with the views of survey respondents (see Figure 5 below), of which less than half (46.5%) of survey respondents agree that the PSD has enabled business and program innovation through technology and data to some or a large extent, though more progress is reported towards information being managed as a strategic asset (52.2%).

In addition to the common themes in differences by respondent type noted above, respondents working in IT were more likely to see achievement towards the outcome of enabled business and program innovation through technology and data, with 53.9% saying some or large extent. Respondents working in Service Design and Delivery were less likely to say information is managed as a strategic asset and is increasingly open, with 42.8% saying some or large extent.

Figure 5: Survey respondent views on degree to which PSD has enabled business and program innovation through technology and data and information to be managed as a strategic asset and be increasingly open (n=421–427)

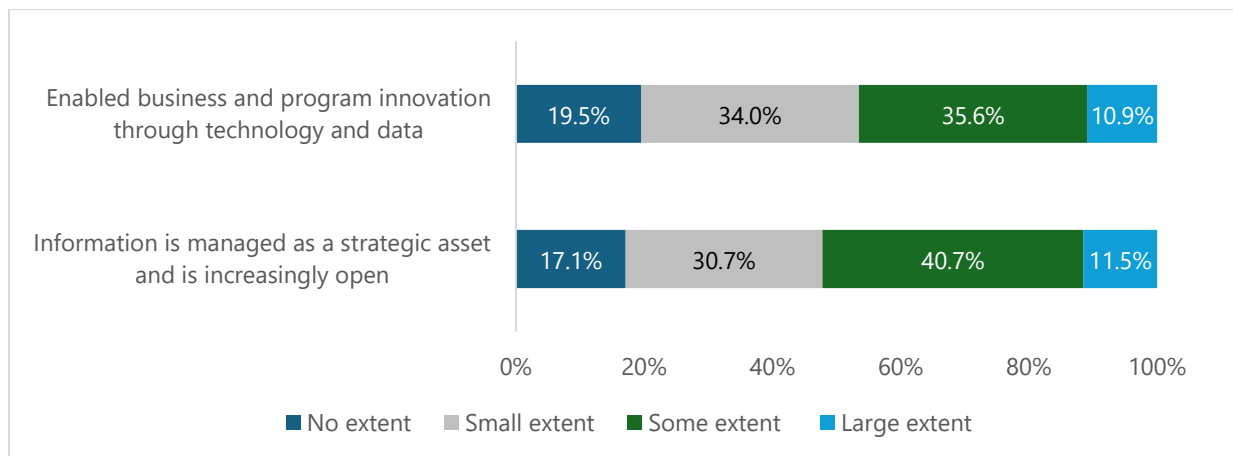


Figure 5 long description

¹⁶ Office of the Auditor General of Canada (2023). [The Benefits Delivery Modernization Programme](#).

¹⁷ Office of the Auditor General of Canada. [Modernizing Information Technology Systems](#).

¹⁸ Boots, S., Clarke, A., Brousseau, C., & Lajoie, A. (2024). Breaking All the Rules: Information Technology Procurement in the Government of Canada. *Canadian Public Administration*, 67(3), 297–325.

Survey statement	No extent (%)	Small extent (%)	Some extent (%)	Large extent (%)
Enabled business and program innovation through technology and data	19.5	34.0	35.6	10.9
Information is managed as a strategic asset and is increasingly open	17.1	30.7	40.7	11.5

Outcome 4: Workforce Capacity and Capability Development is Supported

This outcome has been achieved to a small extent. One example of progress towards this outcome is the development of a Public Skills Strategy and the Directive on Digital Talent. However, those consulted for the review reported that overall advancement remains limited. Survey respondents noted the least progress against this outcome compared with other outcomes, with well under half (39.7%) saying the PSD has supported workforce capacity and capability development to at least some extent.

About half (52.6%) of survey respondents said the PSD has supported a digitally enabled and skilled public service. In addition to the common themes in differences by respondent type noted above, respondents working in Service Design were less likely to see achievement of workforce capacity and capability development, with 33.1% saying some or large extent.

Participants in both focus groups also agreed that the PSD has not made progress towards this outcome. They noted a serious need for investment in both hiring (e.g., data experts, cyber security) and skills development, in particular in service and in digital talent outside of IT functions. Respondents also noted that hiring is currently limited due to public service hiring freezes.

Gaps in workforce capacity and capability development related to digital have remained a consistent source of external criticism, namely due to the government's dearth of modern in-house digital competency and reliance on outside contractors for IT services, which has been argued is likely a crucial driver of the government's lagged and failing digital reform efforts.¹⁹

Factors Negatively Affecting Outcome Achievement

- Weak accountability and enforcement, namely unclear authorities and insufficient enterprise-wide enforcement mechanisms, resulting in limited consequences for non-compliance. Digital Standards are also noted to be non-binding, non-enforceable.

¹⁹ [Boots, S., Clarke, A., Brousseau, C., & Lajoie, A. Breaking All the Rules](#), p. 32, 3.

- An overall absence of a system view due to policy-siloed functions and lack of an enterprise-wide digital mandate. There is also limited coordination due to silos between departments, and siloed reporting frameworks.
- An overemphasis on process (checklists) over outcomes.
- Fragmented and incoherent policy architecture.
- Limited resources, both funding and/or staff capacity (in May 2022, the gap in digital roles was estimated at around 7,000), and insufficient digital literacy amongst policy staff and senior leaders. ²⁰Barriers to procurement are an exacerbating factor and have been recently identified in an Institute for Research on Public Policy (IRPP) Policy Options article as a barrier to improving the government’s IT capacity by preventing departments and agencies from building core digital teams in a timely and responsive manner²¹
- Limited awareness and understanding of the PSD, in particular outside of the federal IT community.
- Complex language and large scope of the PSD.
- Barriers relating to sharing of data (i.e., conflicting interpretations of the Privacy Act) and codes. The recent IRPP Policy Options article also notes the GC should mandate open-source software and code, in line with the practices of other governments.²² This includes making changes to the *Policy on Title to Intellectual Property Arising Under Crown Procurement Contracts (2015)*²³
- Insufficient focus on achieving outcomes for clients.

Figure 6: Survey respondent views on extent to which the PSD has supported a digitally enabled and skilled public service and workforce capacity and capability development (n=423–425)

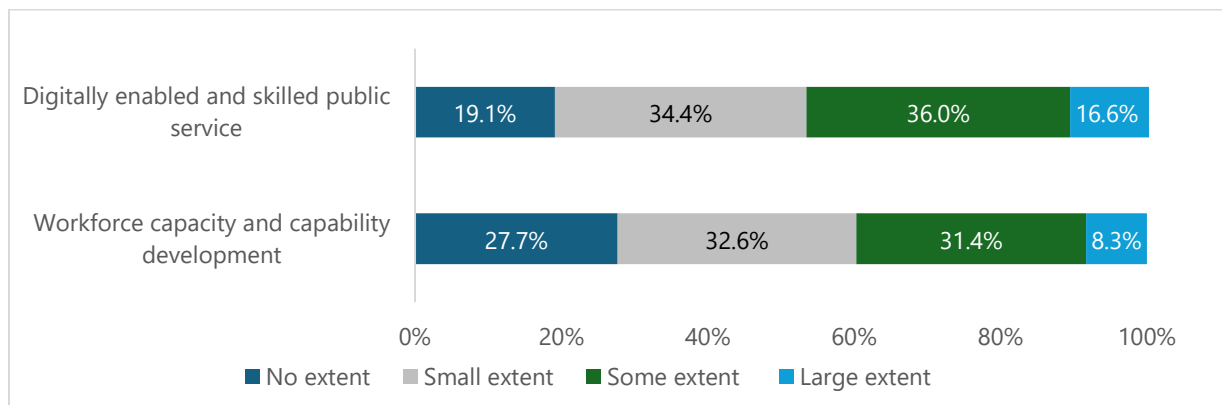


Figure 6 long description

²⁰ Boots, S., Clarke, A., Brousseau, C., & Lajoie, A. Breaking All the Rules.

²¹ Boots, S. & Clarke, A. (February 16, 2024). [ArriveCAN should drive deeper reforms, not just contracting oversight](#). *Policy Options*.

²² Boots, S. & Clarke, A. (February 16, 2024). [ArriveCAN should drive deeper reforms, not just contracting oversight](#). *Policy Options*

²³ Boots, S., Clarke, A., Brousseau, C., & Lajoie, A. Breaking All the Rules.

Survey statement	No extent (%)	Small extent (%)	Some extent (%)	Large extent (%)
Digitally enabled and skilled public service	19.1	34.4	36.0	16.6
Workforce capacity and capability development	27.7	32.6	31.4	8.3

Factors Positively Affecting Outcome Achievement

- Documentation and information exchange opportunities and platforms (e.g., GCExchange, communities of practice, TBS service teams).
- Leadership (e.g., DMs, CSO, CIOs, CFOs) and governance (e.g., EARB).

Quantitative research and fieldwork and data tabulation

Sample size, sampling procedures and dates of research fieldwork

- (i) **Sample size:** 518 completed surveys (71 from CIO/DSO targeted invitations; 447 from open link).
- (ii) **Sampling procedures:** Targeted email invitations were sent to 168 CIO and DSO community members, supplemented by an open survey link shared with the broader digital and service community.
- (iii) **Fieldwork dates:** October 1 to October 27, 2025.

Response rate and method of calculation

- (i) **Response rate:** 42% for the CIO/DSO targeted group.
- (ii) **Method of calculation:** The response rate was calculated by dividing the number of completed surveys from CIO/DSO invitees (71) by the total number of targeted invitations sent (168), i.e., $71 \div 168 = 42\%$.
- (iii) **Limitations and mitigation strategies:**
Due to the use of an open survey link, a full response rate could not be calculated beyond the targeted CIO/DSO group, and the total size of the broader digital and service community is unknown. However, 518 completed surveys provided sufficient input to identify key themes. Given the breadth of the PSD, feedback was collected at a high level, with specific examples drawn from interviews, focus groups, and open-ended survey responses. In the absence of comprehensive

performance data, the review relied on MAF and DRR results, along with qualitative evidence from interviews, focus groups, and the survey to inform findings.

Other information about execution of fieldwork needed to replicate the research initiative

- (i) The review was conducted in three phases: design, data collection, and analysis and reporting, using a mixed-methods approach including document review, survey, interviews, and focus groups. The survey was administered online via GGI's secure Voxco platform from October 1 to October 27, 2025, in both official languages and accessible formats. Targeted email invitations were sent to 168 CIO and DSO community members, with three weekly reminders, and an open survey link was distributed to the broader digital and service community. The questionnaire was programmed, tested, translated, and validated prior to launch. Survey responses were cleaned, validated, and analyzed using frequency distributions, cross-tabulations, and thematic analysis of open-ended responses.
- (ii) In addition, nine semi-structured interviews were conducted via MS Teams with OCIO and TBS personnel, each lasting 30–60 minutes. Two focus groups were also conducted via MS Teams, lasting 90 minutes each, with working-level and senior management participants from 12 federal organizations. Participants were identified and invited with support from the Project Authority, and scheduling was coordinated based on participant availability. Confidentiality and anonymity protocols were applied throughout the data collection process.

Appendix 1

Research instruments used

Online survey

INTRODUCTION

Thank you in advance for completing and submitting this survey as part of the independent review of the Policy on Service and Digital (PSD) being conducted by the Treasury Board Secretariat (TBS). TBS has engaged Goss Gilroy Inc. (GGI) to conduct this online survey of representation of federal departments and agencies who work in service and digital.

Your feedback will offer valuable insights into the PSD's implementation and success and will help identify potential areas for improvement, going forward. The information, opinions, and feedback you provide in this survey are a vital contribution to the evaluation process. This survey will take you approximately 15 minutes to complete.

Confidentiality

Please note that your participation is voluntary and whether you choose to participate or not will have no impact on your relationship with TBS. All data will be analyzed in aggregate form.

Your responses will be kept strictly confidential and managed in accordance with the Access to Information Act and the Privacy Act and used solely for research purposes.

Personal identifiers, such as your name and contact information, will not be used in any reports resulting from this review. Please ensure that you do not include any personal information about yourself or others in your responses.

Completing the Survey

This survey can be completed in either official language of your choice. To switch languages of the survey, at any point, simply click the French or English button at the top of the page.

To navigate the questionnaire, please use the Back and Next buttons located at the bottom left of each page. Do not use the navigation buttons at the top of your web browser or the corresponding shortcut keys.

If you received an invitation to complete the survey with a link, your responses will be saved automatically allowing you to resume later if you cannot complete the survey in one session. If the survey becomes unresponsive at any point, please refresh the page. You may consult others within your organization as needed when answering the questions. The responses to the survey can be added/updated until the survey is submitted.

If you responded to the survey using an open link posted on a webpage or forwarded to you, your responses will not be saved if you leave the questionnaire. Please complete the questionnaire in one sitting.

If you experience any difficulties logging in or completing the survey online, or if you require assistance or alternate mode by which to complete the survey, please contact Laura Pilon at lpilon@ggi.ca.

If you have any questions related to the review, please contact the PSD team at TBS at PSDReset-PSNreinitialisee@tbs-sct.gc.ca.

Please click the 'Next' button to continue.

Q1 Please tell us about yourself. Where do you work:

Select an answer...

Q2 At what level do you work?

Senior (EX-01 and above)

Manager

Working level

Other (please specify)

Prefer not to answer

Q3 What area do you work in? (You may select multiple areas)

Service design or delivery

Policy

Information Technology

Data/Information Management

Cyber Security

Access to Information & Privacy

Other (please specify)

Prefer not to answer

Q4 How many years have you worked in this area in the federal government?

Less than 2 years

2 to 5 years

6 to 10 years

Over 10 years

Prefer not to answer

Q5 Please rate your level of familiarity with the Treasury Board Policy on Service and Digital (PSD).

1 – not at all familiar

2 – a little familiar

3 – somewhat familiar

4 – very familiar

Prefer not to answer

Q6 How would you rate your organization's service and digital maturity?

1 – Very basic

2 – Developing

3 – Moderate

4 – High

Prefer not to answer

Q7 Do you have any other personal or organizational context you wish to share?

Q8 The PSD was introduced in 2020. The next set of questions asks you to provide feedback about the policy's implementation over the last 5 years.

Please indicate the extent to which you agree or disagree with the following statements:

- The requirements under the PSD are clear
- The roles and responsibilities with respect to service and digital are clearly described in the PSD
- The accountabilities with respect to service and digital are clearly described in the PSD

- The reporting requirements under the PSD are clear
- The reporting requirements for departments and agencies are reasonable
- The distinctions between the PSD and other TB policies are not clear

Q9 You disagreed with one or more of the above statements. Please explain.

Q10 You indicated that the distinctions between the PSD and other TB policies are not clear. Please describe the nature of the lack of clarity (i.e., overlap, contradictions).

Q11 Does your organization have policies or guidelines relating to service and digital in addition to the PSD?

Q12 Are there contradictions or duplication between your organization's policy/policies or guidance and the PSD?

Q13 Please indicate the extent to which you agree or disagree with the following statements:

- My organization has received an appropriate level of support from TBS with respect to implementation of the PSD
- The tools (i.e., templates, GCXchange site) provided by TBS for the implementation of PSD were helpful
- The policy guidance provided by TBS for the implementation of PSD was helpful
- The training or workshops provided by TBS for the implementation of PSD was helpful
- I still have a number of outstanding questions about how my organization is supposed to implement the PSD

Q14 You disagreed with one or more of the above statements. Please explain.

Q15 You indicated that you have a number of outstanding questions about how your organization is supposed to implement the PSD. Please explain.

Q16 To what extent would you say that the PSD has :

- Supported integrated decision-making (across the organization)
- Enabled business and program innovation through technology and data
- Supported client-centric service design and delivery
- Supported information to be managed as a strategic asset and be increasingly open
- Improved services and government operations
- Supported workforce capacity and capability development
- Supported a digitally enabled and skilled public service

Q17 Has the PSD supported the achievement of other outcomes you would like to highlight? What are they?

Q18 What factors have facilitated the success of the PSD?

To learn about the PSD reset and opportunities for engagement, please go to Modernizing the Policy on Service and Digital and/or reach out at psdreset-psnreinitialisee@tbs-sct.gc.ca.

LAST

What factors have hindered the success of the PSD?

THANK YOU

Thank you for your participation in this survey!

If you wish to return to a question to add additional information, please click the 'Back' button below to page back to the previous question. Otherwise, Click the 'Submit' button below to submit the survey. Please note that once you hit the 'Submit' button, no additional changes can be made to your responses

Appendix 2

Survey Distribution

Targeted Invitations:

- Sent to **168 Chief Information Officer (CIO) and Designated Senior Official (DSO)** community members
- List provided by OCIO
- Three reminder emails sent (one per week)

Open Link:

- Shared by OCIO for broader digital and service community participation

Response Rate

- **Total completed surveys:** 518
- **From targeted invitations:** 71 (14% of all responses)
- **From open link:** 447 (86% of all responses)
- **CIO/DSO response rate:** 42% (71 out of 168; 5 emails bounced)

Survey Respondent Profile

Top 3 Departments (48% of total):

1. Employment and Social Development Canada - 90 respondents (18%)
2. Treasury Board of Canada Secretariat - 76 respondents (15%)
3. Public Services and Procurement Canada - 66 respondents (13%)

Years of Employment:

- Over 10 years: 252 (49%)
- 2 to 5 years: 131 (26%)
- 6 to 10 years: 83 (16%)
- Less than 2 years: 44 (9%)

Employment Position Level:

- Working level: 216 (43%)

- Senior and above: 144 (29%)
- Manager: 128 (25%)
- Other: 17 (3%)

Areas of Work (respondents could select multiple):

- Information Technology (IT): 238 (47%)
- Data/Information Management: 189 (38%)
- Service design or delivery: 158 (31%)
- Policy: 120 (24%)
- Other: 111 (22%)
- Cyber Security: 75 (15%)
- Access to Information and Privacy: 43 (9%)