



Veterans Review and
Appeal Board Canada

Tribunal des anciens combattants
(révision et appel) Canada

Report on the Administration of the *Privacy Act*



2014-2015

Canada 

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as represented by the Minister of Veterans Affairs, 2015

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Message from the Chair



On behalf of the Veterans Review and Appeal Board, I am pleased to present the 2014-2015 annual report to Parliament on the administration of the *Privacy Act*.

This legislation gives Canadian citizens the right to see and correct personal information held by the Government of Canada. It also protects the individual's right to privacy by strictly controlling how the government uses this information. In 2014-15, the Board continued to receive and process requests under the *Privacy Act* for individuals exercising their rights under this legislation.

This year was a busy one for the Board, as our Access to Information and Privacy (ATIP) Unit released more documents under the *Access to Information Act* and dealt with more requests under the *Privacy Act*.

Our goal in processing these requests is to provide accurate, complete and timely responses to Canadians in accordance with the law. The ATIP Unit continued to provide leadership on privacy matters at the Board by assessing the impacts of new ideas and initiatives to ensure they meet basic privacy requirements.

In 2014-15, we continued to build and promote a privacy culture at the Board through operational improvements, training and communications. We implemented the Treasury Board Secretariat's new Directive on Privacy Practices to ensure sound privacy management practices, and established a peer-review process for accurate hearing documentation. We marked our first annual Privacy Month in May to put a spotlight on the appropriate use and protection of Veterans' personal information. And in July, we learned that our efforts are making a difference through positive results in the privacy audit conducted by the Office of the Comptroller General in 2013-14.

In 2014-2015, the Board continued to provide applicants with an independent avenue of redress for their disability pension, disability award and War Veterans Allowance decisions. In fulfilling this mandate, we are committed to protecting individual rights by upholding the legislation and developing our capacity in matters of access to information and privacy.

A handwritten signature in black ink, appearing to be 'T. Jarmyn', written in a cursive style.

Thomas W. Jarmyn
Acting Chair

The Veterans Review and Appeal Board

Our Objective

The Veterans Review and Appeal Board is an independent, administrative tribunal created in 1995. The Board provides an appeal program for service-related disability decisions made by Veterans Affairs Canada (VAC, the Department). This program gives applicants two levels of redress for disability pension and disability award decisions and the final level of appeal for War Veterans Allowance claims.

The Board's objective is to ensure that Canada's traditional Veterans, Canadian Armed Forces members and Veterans, Royal Canadian Mounted Police applicants, qualified civilians and their families receive the disability pensions, disability awards and other benefits to which they are entitled under the law.

How We Work

The Board operates at arm's-length from the Department to ensure a fair appeal process for applicants. Our work is governed by the *Veterans Review and Appeal Board Act* and delivered by up to 25 permanent Members appointed by the Governor in Council and approximately 80 staff in 2014-2015. Our daily work involves conducting hearings in locations across Canada and issuing written decisions for applicants based on evidence and according to the legislation governing disability benefits.

Our Hearing Program

The Board provides applicants with two levels of redress: a review hearing and a subsequent appeal hearing if they remain dissatisfied. Our hearings are non-adversarial, which means no one argues against the Veteran. Applicants have access to free case preparation and representation at their hearing by the Bureau of Pensions Advocates (a unique organization of lawyers within VAC) or by Service Officers from Veterans' organizations. As independent adjudicators, Board Members are not bound by previous decisions and have authority to change them to benefit applicants if there is credible evidence.

The review hearing is the first and only opportunity in the disability adjudication process for applicants to appear before the decision makers and tell their story (provide testimony). We hold review hearings in locations across Canada, and by video conference, where applicants give oral testimony, bring forward witnesses and new information, and present arguments in support of their case. If applicants are not satisfied with their review decision, they can request an appeal hearing. While the legislation does not permit oral testimony at the appeal level, the hearing is a further opportunity for applicants, through their representative, to submit new information and arguments. Appeal hearings are usually held at the Board's Head Office in Charlottetown, Prince Edward Island.

Our Commitment

The Board is committed to upholding the principles of the *Privacy Act* while providing applicants with a fair and timely appeal process for disability benefits decisions.

1. Introduction

The *Privacy Act* protects the privacy of individuals with respect to personal information held by a government institution and provides individuals with a right of access to that information.

This Act also protects against unauthorized disclosure of that personal information. In addition, it strictly controls how the government will collect, use, disclose, and dispose of any personal information.

Section 72 of the *Privacy Act* requires that the head of every government institution prepare an Annual Report on the administration of the Act for submission to Parliament during each fiscal year.

Mandate

The Veterans Review and Appeal Board has full and exclusive jurisdiction to hear, determine and deal with all applications for review and appeal that may be made to the Board under the *Pension Act*, the *Canadian Forces Members and Veterans Re-establishment and Compensation Act - Part 3*, the *War Veterans Allowance Act* and other Acts of Parliament. All matters related to appeals under this legislation are authorized under the *Veterans Review and Appeal Board Act*.

This Board also adjudicates duty related pension applications under the authority of the *Royal Canadian Mounted Police Pension Continuation Act* and the *Royal Canadian Mounted Police Superannuation Act*.

2. Fulfilling its responsibilities under the *Privacy Act*

The Access to Information and Privacy (ATIP) Office is under the Director, Strategic and Corporate Services who acts on behalf of the Chairperson of the Board to oversee the administration of the *Privacy Act*.

The ATIP Office consists of a Coordinator, a Deputy Coordinator, an ATIP Officer and an ATIP Coordination Officer.

The Board has full responsibility for the administration of the *Privacy Act*.

Duties of the ATIP Coordinator's Office include:

- Process requests for information submitted under the *Privacy Act* in accordance with the legislation, regulations and Treasury Board of Canada Secretariat (TBS) policies and guidelines;
- Provide VRAB managers and staff with advice and guidance regarding the interpretation and application of the *Privacy Act*, and related TBS policies and guidelines;
- Develop policies, procedures and guidelines for the administration of the Act and related TBS policies and guidelines;
- Complete Preliminary and Full Privacy Impact Assessments (PIA) as required;
- Coordinate the resolution of any complaints against VRAB made to the Privacy Commissioner under the *Privacy Act*;
- Promote awareness to ensure employees understand their roles and responsibilities and the Board fulfills its obligations under the Act;
- Review noteworthy decision documents from a privacy perspective before posting on VRAB's website and the Canadian Legal Information Institute's (CanLII) website;
- Manage privacy breaches and inform the Office of the Privacy Commissioner and TBS of all material privacy breaches.
- Respond to Parliamentary written questions on privacy;
- Review contracts with third parties using TBS guidance documents;
- Prepare and post VRAB's chapter of Info Source on the VRAB web site in accordance with TBS directive on decentralization; and
- Prepare annual reports to TBS and Parliament on the administration of the *Privacy Act*.

3. Delegation Order

Delegation Order – *Privacy Act* and Privacy Regulations

The Chairperson, Veterans Review and Appeal Board, pursuant to section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Chairperson as the head of the Veterans Review and Appeal Board under the provisions of the Act and related regulations set out in the schedule below. This designation replaces all previous delegation orders.

Delegation of Authority under the *Privacy Act*

| Provision | Description | Title of position(s) |
|-----------|--|--|
| 8(2)(j) | Disclosure for research or statistical purposes | ATIP Coordinator Deputy Coordinator |
| 8(2)(m) | Disclosure in the public interest or in the interest of the individual | Chairperson |
| 8(4) | Copies of requests under 8(2)(e) to be retained | ATIP Coordinator Deputy Coordinator |
| 8(5) | Notice of disclosure under 8(2)(m) | Chairperson |
| 9(1) | Record of disclosures to be retained | ATIP Coordinator Deputy Coordinator |
| 9(4) | Consistent uses | ATIP Coordinator Deputy Coordinator |
| 10 | Personal information banks | ATIP Coordinator Deputy Coordinator |
| 14(a) | Notice where access requested | ATIP Coordinator Deputy Coordinator ATIP Officer |
| 14(b) | Giving access to the record | ATIP Coordinator Deputy Coordinator |
| 15 | Extension of time limits | ATIP Coordinator Deputy Coordinator ATIP Officer |
| 17(2)(b) | Language of access | ATIP Coordinator Deputy Coordinator ATIP Officer |
| 17(3)(b) | Access in an alternative format | ATIP Coordinator Deputy Coordinator ATIP Officer |

| | | |
|----------|--|--|
| 18(2) | Exemption- Exempt banks- disclosure may be refused | ATIP Coordinator Deputy Coordinator |
| 19 | Exemption -Information obtained in confidence | ATIP Coordinator Deputy Coordinator |
| 20 | Exemption - Federal- provincial affairs | Director General |
| 21 | Exemption- International affairs and defense | Director General |
| 22 | Exemption-Law enforcement and investigations | ATIP Coordinator Deputy Coordinator |
| 22.3 | Exemption – <i>Public Servants Disclosure Protection Act</i> | Director General |
| 23 | Exemption- Security clearances | ATIP Coordinator Deputy Coordinator |
| 24 | Exemption- Individuals sentenced for an offence | ATIP Coordinator Deputy Coordinator |
| 25 | Exemption- safety of individuals | ATIP Coordinator Deputy Coordinator |
| 26 | Exemption- Information about another individual | ATIP Coordinator Deputy Coordinator |
| 27 | Exemption- solicitor-client privilege | ATIP Coordinator Deputy Coordinator |
| 28 | Exemption- Medical records | ATIP Coordinator Deputy Coordinator |
| 31 | Notice of intention to investigate | ATIP Coordinator Deputy Coordinator |
| 33(2) | Right to make representation | ATIP Coordinator Deputy Coordinator |
| 35(1)(b) | Notice of actions to implement recommendations of Commissioner | ATIP Coordinator Deputy Coordinator |
| 35(4) | Access to be given to complainant | ATIP Coordinator Deputy Coordinator |
| 36(3)(b) | Notice of actions to implement recommendations of Commissioner concerning exempt banks | ATIP Coordinator Deputy Coordinator |

| | | |
|----------|--------------------------------|--|
| 51(2)(b) | Special rules for hearings | ATIP Coordinator Deputy Coordinator |
| 51(3) | <i>Ex parte</i> representation | ATIP Coordinator Deputy Coordinator |
| 72(1) | Report to Parliament | ATIP Coordinator Deputy Coordinator |

Delegation of authority under the *Privacy Regulations*

| Provision | Description | Title of Position(s) |
|------------------|--|--|
| 9 | Examination of personal information | ATIP Coordinator Deputy Coordinator ATIP Officer |
| 11(2) | Notification of correction has been made | ATIP Coordinator Deputy Coordinator ATIP Officer |
| 11(4) | Notification of correction has been refused in whole or in part | ATIP Coordinator Deputy Coordinator ATIP Officer |
| 13(1) | Disclosure of personal information relating to physical or mental health | ATIP Coordinator Deputy Coordinator |
| 14 | Examination in the presence of medical practitioner or psychologist. | ATIP Coordinator Deputy Coordinator |

Dated, at the city of Charlottetown, this thirty-first day of March, 2014



John Larlee

Chairperson, Veterans Review and Appeal Board

4. Statistical Report - Interpretation

The Statistical Report (see Annex 1) provides a summary of the formal *Privacy Act* requests processed between the reporting period of April 1, 2014, and March 31, 2015.

PART 1 Requests under the *Privacy Act*

During the reporting period VRAB received thirty-four (34) requests under the *Privacy Act*. One (1) request was outstanding from the previous reporting period, for a total of thirty-five (35) requests.

PART 2 Requests closed during the reporting period

2.1 Disposition and completion time

This section demonstrates the disposition of closed requests and the length of time to process them. During the reporting period VRAB completed thirty-four (34) requests under the *Privacy Act*. There were thirteen (13) requests where the information was all disclosed, sixteen (16) where it was disclosed in part and five (5) where no records exist.

Of the thirty-four (34) requests completed by VRAB thirteen (13) were completed within 15 days and twenty-one (21) within 16 to 30 days.

2.2 Exemptions

During the reporting period VRAB invoked section 26 (information about another individual) of the *Privacy Act* sixteen (16) times.

2.3 Exclusions

Pursuant to sections 69 and 70 of the *Privacy Act*, the *Act* does not apply to library or museum material preserved solely for public reference, material placed in the Library and Archives of Canada, personal information that is publicly available or confidences of the Queen's Privy Council. No exclusions were cited during the 2014-2015 reporting period.

2.4 Format of information released

During the reporting period eleven (11) cases were released in whole or in part on paper, twelve (12) were released electronically on CD and six (6) were released under other formats. The other format was digital recording.

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

In the twenty-nine (29) requests where information was released, there were 1058 pages processed and all disclosed and 4105 pages processed and disclosed in part for a total of

5163 pages released.

2.5.2 Relevant pages processed and disclosed by size of requests

Twelve (12) of the requests processed had less than 100 pages for a total of 303 pages disclosed. There were fourteen (14) requests which were between 101 and 500 pages processed for a total of 3294 pages disclosed and three (3) requests between 501 and 1000 pages processed for a total of 1566 disclosed.

2.5.3 Other complexities

Two (2) cases where information was all disclosed and two (2) cases where information was disclosed in part required legal advice. Eight (8) cases where information was all disclosed and thirteen (13) cases where information was disclosed in part had other complexities. The other complexity to these cases involved the processing of audio recordings.

2.6 Deemed refusals

During the reporting period VRAB met all statutory deadlines on requests and has no deemed refusals to report.

2.6.1 Reasons for not meeting statutory deadline

Not applicable.

2.6.2 Number of days past deadline

Not applicable.

2.7 Requests for translation

During the reporting period VRAB had zero (0) requests for translation.

PART 3 Disclosures under subsection 8(2) and 8(5)

During the reporting period VRAB had one (1) disclosure of personal information under subsection 8(2)(e) of the *Privacy Act*.

VRAB had no disclosures of personal information under subsection 8(2)(m) and therefore had no requirement to notify the Privacy Commissioner under subsection 8(5) of the *Privacy Act*.

PART 4 Requests for correction of personal information and notations

During the reporting period VRAB received one (1) request for corrections and/or notations. To address this request VRAB attached notations to the personal information as the original documents were on microfiche.

PART 5 Extensions

During the reporting period VRAB made zero (0) requests for extensions.

5.1 Reasons for extensions and disposition of request

Not applicable

5.2 Length of extensions

Not applicable.

PART 6 Consultations received from other institutions and organizations

6.1 Consultations received from other Government of Canada institutions and organizations

During the reporting period VRAB received zero (0) consultations from another Government of Canada institutions and organizations.

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Not applicable.

6.3 Recommendations and completion time for consultations received from other organizations

VRAB did not receive any consultations from other organizations.

PART 7 Completion time of consultations on Cabinet confidences

VRAB had zero (0) consultations on Cabinet confidences.

7.1 Requests with Legal Services

Not Applicable

7.2 Requests with Privy Council Office

Not Applicable

PART 8 Complaints and Investigations notices received

During the reporting period VRAB received one (1) complaint from the Office of the Privacy Commissioner pursuant to section 31. VRAB made representation to the Privacy Commissioner pursuant to section 35 for this one (1) complaint. The VRAB received a report of finding from the Privacy Commissioner pursuant to section 37 concerning this one (1) complaint.

The VRAB had no complaints in which the requester or the Privacy Commissioner applied to the Federal court for a review where access was refused.

PART 9 Privacy Impact Assessments (PIAs)

During the reporting period VRAB did not complete any Privacy Impact Assessments.

PART 10 Resources related to the *Privacy Act*

10.1 Costs

During the reporting period, VRAB spent a total of \$154,073.00 administering the *Privacy Act*. Staff salaries accounted for \$150,455.00, and other administrative costs (representing goods and services and expenditures) amounted to \$3,618.

10.2 Human Resources

During the reporting period VRAB had 2.05 person years dedicated to Privacy activities.

5. Training

The ATIP office conducted mandatory Board wide training in 2013-14. During the 2014-15 reporting period the ATIP office continued to offer ATIP training sessions to new employees. The training sessions dealt with the appropriate use and protection of personal information, steps to take if a privacy breach occurs and to reinforced employee obligations under the *Access to Information Act* and the *Privacy Act*. Two (2) sessions were held with fourteen (14) participants.

Twenty-one (21) employees also participated in security briefing sessions that included an overview of access to information and privacy legislation.

6. Policies, Guidelines and Procedures

May 2014 marked the first annual Privacy Month at the Board. Throughout the month, the ATIP office displayed posters in key area throughout the Board, sent out weekly email tips that were accompanied by cartoon graphics and revised and distributed the following memoranda to remind all employees and members of best practices when handling information:

- Privacy and Protection of Client Information
- ABC's of Protected Information
- Clean Desk Policy
- Need to Know Principle
- Safe Disposal of Protected and Classified Information.

These memos, posters and email tips foster a privacy culture at the Board and ensure continual awareness of employees' roles and responsibilities when handling personal information and include procedures on the protection and disposal of personal information.

The Board revised its Privacy Breach procedures to reflect the new mandatory reporting of material privacy breaches to the OPC and TBS. This mandatory reporting is in accordance with TBS' Directive on Privacy Practices.

Employees' access to electronic client files is based on job functions and are reviewed and modified as position duties and roles change.

7. Complaints and/or Investigations

The Office of the Privacy Commissioner (OPC) investigated one (1) VRAB complaint during the 2014-15 reporting period. The complaint concerned use and disclosure of personal information, in particular access to the client's electronic files dating back to the time period of 2001-2008. In the fall of 2010 the OPC conducted an audit of Veterans Affairs Canada's (VAC) privacy practices; this included the client service delivery network (CSDN) which is the system that houses clients' electronic files.

Recommendations from this audit were incorporated in or were part of VAC's 10-point Privacy Action Plan and VAC's Privacy Action plan 2.0 launched respectively in November 2010 and May 2012. These action plans addressed among other things, access and monitoring of the CSDN. By February 2012, all access to the CSDN had been refined and access rights role based. Proactive monitoring began and all employees must properly document their reason for accessing a client file. Disciplinary measures were introduced to deal with inappropriate access. VRAB embraced the recommendations made by the OPC and VAC's Privacy Action Plans and has taken steps to heighten its own privacy practices by implementing all applicable recommendations. Memos are circulated annually to remind employees of their responsibilities when handling personal information and all employees received mandatory training.

8. Monitoring of process time

The VRAB ATIP office monitors all requests for information in Access Pro Case Management. This software allows for inputting and tracking of requests. The ATIP Officer monitors all requests received in the ATIP office and provides the Deputy Coordinator with a weekly status/progress report.

9. Material Privacy Breaches

During the 2014-2015 reporting period, six (6) material breaches impacting six (6) individuals were confirmed by VRAB. Of the six (6) material breaches, four (4) were reported to OPC and TBS in accordance with the new Directive on Privacy Practices which came into effect on May 6, 2014. The two (2) material breaches that were not reported predated the implementation of mandatory reporting.

As soon as a breach is detected the supervisor/manager notifies the ATIP office who mitigates the breach. The ATIP office using guidelines and directives from TBS, along with its own newly updated

procedures, contain the breach and communicate with the affected individuals first by telephone and then again in writing. The ATIP office informs the affected individuals of the breach and their right to complain to the OPC.

In the fall of 2014, the Board implemented a peer review process within the unit that prepares the Statement of Case for VRAB hearings. Each Statement of Case is reviewed by another employee to ensure that there is no misfiled information of another individual and that all information belongs to the Veteran who applied for a hearing.

VRAB treats every breach as a serious matter, and has taken steps to strengthen the importance of protecting applicant's information with mandatory Board wide training and with the inception of VRAB privacy month.

10. Privacy Impact Assessment (PIA)

During the 2014-15 reporting period VRAB did not complete any Privacy Impact Assessments.

11. Disclosures Pursuant to Paragraph 8(2)(m)

There were no disclosures made of personal information pursuant to paragraph 8(2)(m) of the *Privacy Act* during the 2014-2015 reporting period.

Annex 1 – Statistical Report on the *Privacy Act*

Statistical Report on the *Privacy Act*

Name of institution: Veterans Review and Appeal Board

Reporting period: 2014-04-01 to 2015-03-31

Part 1: Requests Under the *Privacy Act*

| | Number of Requests |
|--|--------------------|
| Received during reporting period | 34 |
| Outstanding from previous reporting period | 1 |
| Total | 35 |
| Closed during reporting period | 34 |
| Carried over to next reporting period | 1 |

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

| Disposition of Requests | Completion Time | | | | | | | Total |
|------------------------------|-----------------|---------------|---------------|----------------|-----------------|-----------------|--------------------|-----------|
| | 1 to 15 Days | 16 to 30 Days | 31 to 60 Days | 61 to 120 Days | 121 to 180 Days | 181 to 365 Days | More Than 365 Days | |
| All disclosed | 7 | 6 | 0 | 0 | 0 | 0 | 0 | 13 |
| Disclosed in part | 2 | 14 | 0 | 0 | 0 | 0 | 0 | 16 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| No records exist | 4 | 1 | 0 | 0 | 0 | 0 | 0 | 5 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 13 | 21 | 0 | 0 | 0 | 0 | 0 | 34 |

2.2 Exemptions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|----------|--------------------|---------------|--------------------|---------|--------------------|
| 18(2) | 0 | 22(1)(a)(i) | 0 | 23(a) | 0 |
| 19(1)(a) | 0 | 22(1)(a)(ii) | 0 | 23(b) | 0 |
| 19(1)(b) | 0 | 22(1)(a)(iii) | 0 | 24(a) | 0 |
| 19(1)(c) | 0 | 22(1)(b) | 0 | 24(b) | 0 |
| 19(1)(d) | 0 | 22(1)(c) | 0 | 25 | 0 |
| 19(1)(e) | 0 | 22(2) | 0 | 26 | 16 |
| 19(1)(f) | 0 | 22.1 | 0 | 27 | 0 |
| 20 | 0 | 22.2 | 0 | 28 | 0 |
| 21 | 0 | 22.3 | 0 | | |

2.3 Exclusions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|----------|--------------------|----------|--------------------|----------|--------------------|
| 69(1)(a) | 0 | 70(1) | 0 | 70(1)(d) | 0 |
| 69(1)(b) | 0 | 70(1)(a) | 0 | 70(1)(e) | 0 |
| 69.1 | 0 | 70(1)(b) | 0 | 70(1)(f) | 0 |
| | | 70(1)(c) | 0 | 70.1 | 0 |

2.4 Format of information released

| Disposition | Paper | Electronic | Other formats |
|-------------------|-------|------------|---------------|
| All disclosed | 3 | 4 | 6 |
| Disclosed in part | 8 | 8 | 0 |
| Total | 11 | 12 | 6 |

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

| Disposition of Requests | Number of Pages Processed | Number of Pages Disclosed | Number of Requests |
|------------------------------|---------------------------|---------------------------|--------------------|
| All disclosed | 1058 | 1058 | 13 |
| Disclosed in part | 4105 | 4105 | 16 |
| All exempted | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 |
| Total | 5163 | 5163 | 29 |

2.5.2 Relevant pages processed and disclosed by size of requests

| Disposition | Less Than 100 Pages Processed | | 101-500 Pages Processed | | 501-1000 Pages Processed | | 1001-5000 Pages Processed | | More Than 5000 Pages Processed | |
|------------------------------|-------------------------------|-----------------|-------------------------|-----------------|--------------------------|-----------------|---------------------------|-----------------|--------------------------------|-----------------|
| | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed |
| All disclosed | 8 | 66 | 5 | 992 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 4 | 237 | 9 | 2302 | 3 | 1566 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 12 | 303 | 14 | 3294 | 3 | 1566 | 0 | 0 | 0 | 0 |

2.5.3 Other complexities

| Disposition | Consultation Required | Legal Advice Sought | Interwoven Information | Other | Total |
|------------------------------|-----------------------|---------------------|------------------------|-----------|-----------|
| All disclosed | 0 | 2 | 0 | 8 | 10 |
| Disclosed in part | 0 | 2 | 0 | 13 | 15 |
| All exempted | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 4 | 0 | 21 | 25 |

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

| Number of Requests Closed Past the Statutory Deadline | Principal Reason | | | |
|---|------------------|-----------------------|-----------------------|-------|
| | Workload | External Consultation | Internal Consultation | Other |
| 0 | 0 | 0 | 0 | 0 |

2.6.2 Number of days past deadline

| Number of Days Past Deadline | Number of Requests Past Deadline Where No Extension Was Taken | Number of Requests Past Deadline Where An Extension Was Taken | Total |
|------------------------------|---|---|-------|
| 1 to 15 days | 0 | 0 | 0 |
| 16 to 30 days | 0 | 0 | 0 |
| 31 to 60 days | 0 | 0 | 0 |
| 61 to 120 days | 0 | 0 | 0 |
| 121 to 180 days | 0 | 0 | 0 |
| 181 to 365 days | 0 | 0 | 0 |
| More than 365 days | 0 | 0 | 0 |
| Total | 0 | 0 | 0 |

2.7 Requests for translation

| Translation Requests | Accepted | Refused | Total |
|----------------------|----------|---------|-------|
| English to French | 0 | 0 | 0 |
| French to English | 0 | 0 | 0 |
| Total | 0 | 0 | 0 |

Part 3: Disclosures Under Subsections 8(2) and 8(5)

| Paragraph 8(2)(e) | Paragraph 8(2)(m) | Subsection 8(5) | Total |
|-------------------|-------------------|-----------------|-------|
| 1 | 0 | 0 | 1 |

Part 4: Requests for Correction of Personal Information and Notations

| Disposition for Correction Requests Received | Number |
|--|--------|
| Notations attached | 1 |
| Requests for correction accepted | 0 |
| Total | 1 |

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

| Disposition of Requests Where an Extension Was Taken | 15(a)(i) Interference With Operations | 15(a)(ii) Consultation | | 15(b) Translation or Conversion |
|--|---|---------------------------|-------|---------------------------------------|
| | | Section 70 | Other | |
| All disclosed | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 |
| No records exist | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |

5.2 Length of extensions

| Length of Extensions | 15(a)(i) Interference with operations | 15(a)(ii) Consultation | | 15(b) Translation purposes |
|----------------------|---|---------------------------|-------|----------------------------------|
| | | Section 70 | Other | |
| 1 to 15 days | 0 | 0 | 0 | 0 |
| 16 to 30 days | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

| Consultations | Other Government of Canada Institutions | Number of Pages to Review | Other Organizations | Number of Pages to Review |
|--|--|------------------------------|------------------------|------------------------------|
| Received during the reporting period | 0 | 0 | 0 | 0 |
| Outstanding from the previous reporting period | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |
| Closed during the reporting period | 0 | 0 | 0 | 0 |
| Pending at the end of the reporting period | 0 | 0 | 0 | 0 |

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

| Recommendation | Number of Days Required to Complete Consultation Requests | | | | | | | Total |
|---------------------------|---|---------------------|---------------------|----------------------|-----------------------|-----------------------|-----------------------------|-------|
| | 1 to 15 Days | 16 to 30 Days | 31 to 60 Days | 61 to 120 Days | 121 to 180 Days | 181 to 365 Days | More Than 365 Days | |
| All disclosed | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Consult other institution | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

6.3 Recommendations and completion time for consultations received from other organizations

| Recommendation | Number of days required to complete consultation requests | | | | | | | Total |
|---------------------------|---|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------|
| | 1 to 15 Days | 16 to 30 Days | 31 to 60 Days | 61 to 120 Days | 121 to 180 Days | 181 to 365 Days | More Than 365 Days | |
| All disclosed | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Consult other institution | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

| Number of Days | Fewer Than 100 Pages Processed | | 101-500 Pages Processed | | 501-1000 Pages Processed | | 1001-5000 Pages Processed | | More than 5000 Pages Processed | |
|----------------|--------------------------------|-----------------|-------------------------|-----------------|--------------------------|-----------------|---------------------------|-----------------|--------------------------------|-----------------|
| | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed |
| 1 to 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 16 to 30 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 31 to 60 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 61 to 120 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 121 to 180 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 181 to 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| More than 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

7.2 Requests with Privy Council Office

| Number of Days | Fewer Than 100 Pages Processed | | 101–500 Pages Processed | | 501-1000 Pages Processed | | 1001-5000 Pages Processed | | More than 5000 Pages Processed | |
|----------------|--------------------------------|-----------------|-------------------------|-----------------|--------------------------|-----------------|---------------------------|-----------------|--------------------------------|-----------------|
| | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed |
| 1 to 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 16 to 30 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 31 to 60 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 61 to 120 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 121 to 180 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 181 to 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| More than 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Part 8: Complaints and Investigations Notices Received

| Section 31 | Section 33 | Section 35 | Court action | Total |
|------------|------------|------------|--------------|-------|
| 1 | 1 | 1 | 0 | 3 |

Part 9: Privacy Impact Assessments (PIAs)

| | |
|----------------------------|---|
| Number of PIA(s) completed | 0 |
|----------------------------|---|

Part 10: Resources Related to the Privacy Act

10.1 Costs

| Expenditures | | Amount |
|-----------------------------------|---------|------------------|
| Salaries | | \$150,455 |
| Overtime | | \$0 |
| Goods and Services | | \$3,618 |
| • Professional services contracts | \$0 | |
| • Other | \$3,618 | |
| Total | | \$154,073 |

10.2 Human Resources

| Resources | Person Years Dedicated to Privacy Activities |
|----------------------------------|--|
| Full-time employees | 2.05 |
| Part-time and casual employees | 0.00 |
| Regional staff | 0.00 |
| Consultants and agency personnel | 0.00 |
| Students | 0.00 |
| Total | 2.05 |

Note: Enter values to two decimal places.

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