

# Report on the Administration of the *Privacy Act*

2016-17

Canadä

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#### MESSAGE FROM THE CHAIR



On behalf of the Veterans Review and Appeal Board, I am pleased to present the 2016-17 annual report to Parliament on the administration of the *Privacy Act*.

This legislation gives Canadian citizens the right to access 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 collects, uses, discloses and disposes of this information. In 2016-17, the Board continued to receive and process requests under the *Privacy Act* for individuals exercising their rights under this legislation.

This year our Access to Information and Privacy (ATIP) Unit received fewer access and privacy requests compared to the previous year. Our

goal in processing these requests is to provide accurate, complete and timely responses to Canadians in accordance with the law.

In 2016-17, the ATIP Unit continued to provide leadership on privacy matters at the Board by assessing the impacts of new ideas and initiatives. For example, the unit completed four Preliminary Privacy Impact Assessments to ensure projects met basic privacy requirements. The Board continued to post summaries of its completed Access to Information requests on the <a href="Open Government Portal">Open Government Portal</a>, to support transparency, accountability and citizen engagement.

We continued to build and promote a privacy culture at the Board through operational improvements, training and communications. This included reminding employees how to safely dispose of protected information, and putting a spotlight on the appropriate use and protection of Veterans' personal information during our third annual Privacy Month in May. I continue to be pleased with the excellent work of our pre-hearing unit to prevent privacy breaches by identifying service documents misfiled by other organizations: for the second year in a row no material privacy breaches occurred at the Board.

In 2016-17, 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.

Thomas W. Jarmyn Acting Chair

#### THE VETERANS REVIEW AND APPEAL BOARD

#### **OUR OBJECTIVE**

The Veterans Review and Appeal Board (VRAB, the 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 benefits 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 75 staff in 2016-17. 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.

#### 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*.

#### 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, and Senior 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;
- Manage privacy breaches and inform the Office of the Privacy Commissioner (OPC) 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 (Information about Programs and Information Holdings) on the VRAB web site in accordance with the TBS directive on decentralization; and
- Prepare an annual report to TBS and Parliament on the administration of the Privacy Act.

#### **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 – Public Servants Disclosure Protection Act          | 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)    | Ex parte 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    | ATIP Coordinator     |
|           | or in part  | Deputy Coordinator   |
|           |   | ATIP Officer         |
| 13(1)     | Disclosure of personal information relating to physical | ATIP Coordinator     |
|           | or mental health  | Deputy Coordinator   |
| 14        | Examination in the presence of medical practitioner     | ATIP Coordinator     |
|           | or psychologist.  | Deputy Coordinator   |

Dated, at the city of Charlottetown, this thirty-first day of March, 2016.

Thomas W. Jarmyn

Acting Chairperson, Veterans Review and Appeal Board

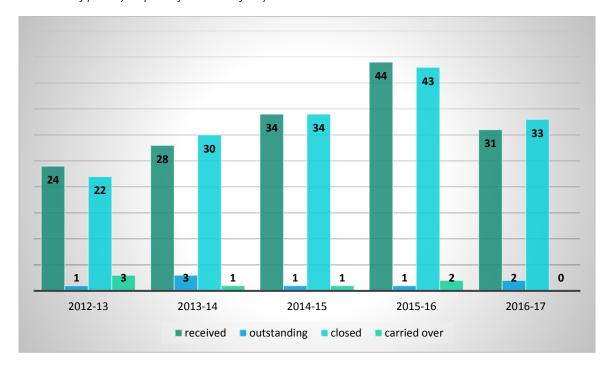
#### STATISTICAL REPORT - INTERPRETATION

The Statistical Report (Annex 1) provides a summary of the formal *Privacy Act* requests processed for the reporting period of April 1, 2016 and March 31, 2017.

#### PART 1 - REQUESTS UNDER THE PRIVACY ACT

During the reporting period, VRAB received 31 requests under the *Privacy Act*. Two requests were outstanding from the previous reporting period, for a total of 33 requests closed during the reporting period. This represents a decrease of 10 requests completed (-23%) compared to last year's total of 43. The numbers in the table below illustrate privacy requests over the last five years.

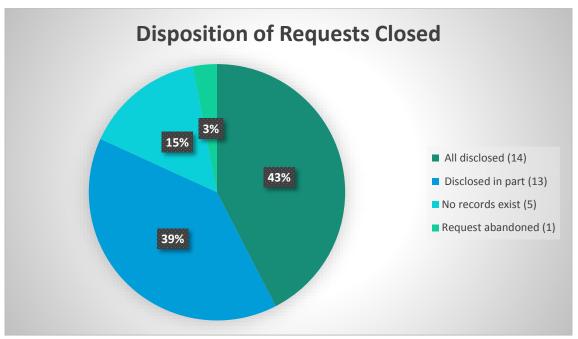
Table 1 - Overview of privacy requests for the last five years



#### 2.1 - DISPOSITION AND COMPLETION TIME

This table illustrates the disposition of the 33 requests that were completed in 2016-17 with information disclosed in accordance with the provisions of the legislation.

Table 2 - Disposition of Requests Closed



Of these 33 requests, 23 were completed within 15 days and 10 within 16-30 days.

#### 2.2 - EXEMPTIONS

An exemption is a provision under the *Privacy Act* that authorizes the head of the institution or delegate to refuse to disclose records in response to a privacy request.

The following table identifies the number of requests to which specific types of exemptions were applied:

| Exemptions cited                                    | 2014-15 | 2015-16 | 2016-17 |
|---|---------|---------|---------|
| Subsection 22(1)(b) Law enforcement & investigation | 0       | 0       | 1       |
| Section 26 information about another individual     | 16      | 18      | 13      |
| Section 27 solicitor-client privilege               | 0       | 0       | 2       |

#### 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 2016-17 reporting period.

#### 2.4 - FORMAT OF INFORMATION RELEASED

For requests where information is disclosed, the requester has the right to ask for the information in the format of choice. During the reporting period 11 requests were released in whole or in part on paper, 10 were released on CDs and six were released under other formats (i.e. audio recordings).

#### 2.5 - COMPLEXITY

During the reporting period, the ATIP office disclosed a total of 4,623 pages. This represents a decrease of 3,091 pages processed (-40%) compared to last year's total of 7,714 pages processed.

| Fiscal Year | Number of pages processed | Number of pages<br>disclosed | Number of requests |
|-------------|---------------------------|------------------------------|--------------------|
| 2014-15     | 5,163                     | 5,163                        | 29                 |
| 2015-16     | 7,714                     | 7,714                        | 32                 |
| 2016-17     | 4,656                     | 4,623                        | 28                 |

The other complexities associated with the handling of requests consisted of seeking legal advice on two requests and processing audio recordings in 20 requests.

#### 2.6 - DEEMED REFUSALS

During the reporting period, VRAB met all statutory deadlines on requests; therefore, it does not have any deemed refusals to report.

#### 2.7 - REQUESTS FOR TRANSLATION

In 2016-17, VRAB did not receive any requests for translation.

#### PART 3 - DISCLOSURES UNDER SUBSECTION 8(2) AND 8(5)

During the reporting period VRAB did not have any disclosures under paragraph 8(2)(e) or 8(2)(m). Therefore, VRAB 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

In 2016-17, VRAB did not receive any requests for corrections and/or notations.

#### PART 5 - EXTENSIONS

The *Privacy Act* allows institutions to extend the original 30 day limit under certain specific circumstances as provided under section 15 of the *Act*. VRAB did not invoke any extensions in 2016-17.

#### PART 6 - CONSULTATIONS RECEIVED FROM OTHER INSTITUTIONS AND ORGANIZATIONS

VRAB received one consultation during the reporting period from another Government of Canada institution consisting of eight pages to review. The recommendation was to disclose entirely and it was completed within two days. There were no consultations received from other organizations.

#### PART 7 - COMPLETION TIME OF CONSULTATIONS ON CABINET CONFIDENCES

In 2016-17, VRAB had no consultations on Cabinet Confidences; therefore, there were no requests with legal services or the Privy Council Office for review and recommendation on the application of section 70 of the *Privacy Act*.

#### PART 8 - COMPLAINTS AND INVESTIGATIONS NOTICES RECEIVED

During the reporting period, VRAB did not receive any notices under section 31, 33 or 35 concerning complaints and investigations.

#### PART 9 - PRIVACY IMPACT ASSESSMENTS (PIAs)

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

#### PART 10 - RESOURCES RELATED TO THE PRIVACY ACT

In 2016-17, VRAB spent a total of \$127,884 administering the *Privacy Act*. Staff salaries accounted for \$123,694 and other administrative costs (representing goods and services) amounted to \$4,190. During the reporting period VRAB dedicated 1.85 person years to privacy activities.

#### **TRAINING**

In 2016-17, the VRAB ATIP office held one ATIP training session for five new employees. Since its inaugural year in 2013-14, ATIP training has become a key orientation component for all new employees, whether they are indeterminate, term or casual. The training session deals with the appropriate use and protection of personal information, steps to take if a privacy breach occurs, and employee obligations under the *Access to Information Act* and the *Privacy Act*.

Additionally, nine employees participated in security briefing sessions that included an overview of both access to information and privacy legislation.

#### POLICIES, GUIDELINES AND PROCEDURES

May 2016 marked the third annual Privacy Month at the Board. Throughout the month posters were prominently displayed throughout the Board, weekly e-mail tips were shared with all staff and memoranda on the following topics reminded all employees of best practices when handling information:

- Privacy and Protection of Client Information
- ❖ ABCs of Protected Information
- Clear Desk Practice
- ❖ Need to Know Principle
- Safe Disposal of Protected and Classified Information

These memos, posters, and e-mail tips foster a privacy culture at the Board and ensure continual awareness of employees' roles and responsibilities when handling, protecting and disposing of information. In addition, Privacy Breach Awareness week was added to Privacy Month with a focus on prevention tips and a cheat sheet on what to do in case of a breach.

The Board continued to upload summaries of completed ATI requests to the Open Government portal in support of the Government of Canada's commitment to transparency and Openness.

ATIP procedures were updated following the implementation of TBS' *Interim Directive on the Administration of the Access to Information Act* which took effect May 5, 2016. It directs institutions to waive all fees prescribed by the *Act* and *the Access to Information Regulations*, with the exception of the application fee, and to release information in the format requested by the requester.

#### COMPLAINTS AND/OR INVESTIGATIONS

VRAB did not receive any complaints nor were any audits or investigations concluded during the reporting period.

#### MONITORING OF PROCESS TIME

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

#### MATERIAL PRIVACY BREACHES

The Board is pleased to note that there were no material privacy breaches during the 2016-17 reporting period. This can be attributed to the following key factors:

- The peer review process within the unit that prepares the statement of case for VRAB hearings. This process allows for the review and identification of misfiled documents contained within a statement of case.
- Mandatory ATIP training
- VRAB annual Privacy Month
- Privacy Breach Awareness week

#### PRIVACY IMPACT ASSESSMENT (PIA)

During the 2016-17 reporting period, VRAB did not finalize any Privacy Impact Assessments.

However, it did complete four Preliminary Privacy Impact Assessments. These preliminary assessments allowed the ATIP office to review and make recommendations on potential privacy risks and on whether to conduct a full PIA. In one assessment, a full PIA was recommended and is in the process of being completed. It will be submitted to the OPC and TBS and reported in next year's annual report.

Two PIAs completed in previous years were reviewed to access the status of recommendations from previous reports; and actions were taken to further mitigate privacy risks.

#### 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 2016-17 reporting period.

#### ANNEX 1 – STATISTICAL REPORT ON THE PRIVACY ACT



Government of Canada Gouvernement du Canada

# Statistical Report on the Privacy Act

Name of institution: Veterans Review and Appeal Board

Reporting period: 2016-04-01 2017-03-31 to

# Part 1: Requests Under the Privacy Act

|  | Number of Requests |
|--|--------------------|
| Received during reporting period           | 31                 |
| Outstanding from previous reporting period | 2                  |
| Total                                      | 33                 |
| Closed during reporting period             | 33                 |
| Carried over to next reporting period      | 0                  |

# Part 2: Requests Closed During the Reporting Period

## 2.1 Disposition and completion time

|                              |                 | Completion Time     |                     |                      |                       |                       |                             |       |
|------------------------------|-----------------|---------------------|---------------------|----------------------|-----------------------|-----------------------|-----------------------------|-------|
| Disposition of<br>Requests   | 1 to 15<br>Days | 16 to<br>30<br>Days | 31 to<br>60<br>Days | 61 to<br>120<br>Days | 121 to<br>180<br>Days | 181 to<br>365<br>Days | More<br>Than<br>365<br>Days | Total |
| All disclosed                | 13              | 1                   | 0                   | 0                    | 0                     | 0                     | 0                           | 14    |
| Disclosed in part            | 4               | 9                   | 0                   | 0                    | 0                     | 0                     | 0                           | 13    |
| All exempted                 | 0               | 0                   | 0                   | 0                    | 0                     | 0                     | 0                           | 0     |
| All excluded                 | 0               | 0                   | 0                   | 0                    | 0                     | 0                     | 0                           | 0     |
| No records exist             | 5               | 0                   | 0                   | 0                    | 0                     | 0                     | 0                           | 5     |
| Request abandoned            | 1               | 0                   | 0                   | 0                    | 0                     | 0                     | 0                           | 1     |
| Neither confirmed nor denied | 0               | 0                   | 0                   | 0                    | 0                     | 0                     | 0                           | 0     |
| Total                        | 23              | 10                  | 0                   | 0                    | 0                     | 0                     | 0                           | 33    |

# 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)      | 1                  | 24(b)   | 0                  |
| 19(1)(d) | 0                  | 22(1)(c)      | 0                  | 25      | 0                  |
| 19(1)(e) | 0                  | 22(2)         | 0                  | 26      | 13                 |
| 19(1)(f) | 0                  | 22.1          | 0                  | 27      | 2                  |
| 20       | 0                  | 22.2          | 0                  | 28      | 0                  |

#### 2.3 Exclusions

| Section  | Number of Requests | Section  | Number of<br>Requests | Section  | Number of<br>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     | 6     | 2          | 6             |
| Disclosed in part | 5     | 8          | 0             |
| Total             | 11    | 10         | 6             |

# 2.5 Complexity

# 2.5.1 Relevant pages processed and disclosed

| Disposition of Requests      | Number of Pages<br>Processed | Number of Pages<br>Disclosed | Number of Requests |
|------------------------------|------------------------------|------------------------------|--------------------|
| All disclosed                | 1085                         | 1085                         | 14                 |
| Disclosed in part            | 3571                         | 3538                         | 13                 |
| All exempted                 | 0                            | 0                            | 0                  |
| All excluded                 | 0                            | 0                            | 0                  |
| Request abandoned            | 0                            | 0                            | 1                  |
| Neither confirmed nor denied | 0                            | 0                            | 0                  |
| Total                        | 4656                         | 4623                         | 28                 |

# 2.5.2 Relevant pages processed and disclosed by size of requests

|                                    |                          | nan 100<br>ges<br>essed | Pag                      | -500<br>ges<br>essed | Pa                       | 1000<br>ges<br>essed | Pag                      | -5000<br>ges<br>essed | 50<br>Pag                | Than<br>00<br>ges<br>essed |
|------------------------------------|--------------------------|-------------------------|--------------------------|----------------------|--------------------------|----------------------|--------------------------|-----------------------|--------------------------|----------------------------|
| Disposition                        | Number<br>of<br>Requests | Pages<br>Disclosed      | Number<br>of<br>Requests | Pages<br>Disclosed   | Number<br>of<br>Requests | Pages<br>Disclosed   | Number<br>of<br>Requests | Pages<br>Disclosed    | Number<br>of<br>Requests | Pages<br>Disclosed         |
| All disclosed                      | 10                       | 48                      | 3                        | 501                  | 1                        | 536                  | 0                        | 0                     | 0                        | 0                          |
| Disclosed in part                  | 3                        | 154                     | 10                       | 3384                 | 0                        | 0                    | 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                  | 1                        | 0                       | 0                        | 0                    | 0                        | 0                    | 0                        | 0                     | 0                        | 0                          |
| Neither<br>confirmed nor<br>denied | 0                        | 0                       | 0                        | 0                    | 0                        | 0                    | 0                        | 0                     | 0                        | 0                          |
| Total                              | 14                       | 202                     | 13                       | 3885                 | 1                        | 536                  | 0                        | 0                     | 0                        | 0                          |

# 2.5.3 Other complexities

| Disposition                        | Consultation<br>Required | Legal Advice<br>Sought | Interwoven Information | Other | Total |
|------------------------------------|--------------------------|------------------------|------------------------|-------|-------|
| All disclosed                      | 0                        | 0                      | 0                      | 9     | 9     |
| Disclosed in part                  | 0                        | 2                      | 0                      | 11    | 13    |
| All exempted                       | 0                        | 0                      | 0                      | 0     | 0     |
| All excluded                       | 0                        | 0                      | 0                      | 0     | 0     |
| Request abandoned                  | 0                        | 0                      | 0                      | 0     | 0     |
| Neither<br>confirmed nor<br>denied | 0                        | 0                      | 0                      | 0     | 0     |
| Total                              | 0                        | 2                      | 0                      | 20    | 22    |

#### 2.6 Deemed refusals

# 2.6.1 Reasons for not meeting statutory deadline

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

# 2.6.2 Number of days past deadline

| Number of Days Past<br>Deadline | Number of Requests<br>Past Deadline Where<br>No Extension Was<br>Taken | Number of Requests<br>Past Deadline Where<br>An Extension Was<br>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 |
|-------------------|-------------------|-----------------|-------|
| 0                 | 0                 | 0               | 0     |

# Part 4: Requests for Correction of Personal Information and Notations

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

# **Part 5: Extensions**

## 5.1 Reasons for extensions and disposition of requests

|   | 15(a)(i)<br>Interference | 15(a<br>Consu | 15(b) |                           |
|---|--------------------------|---------------|-------|---------------------------|
| Disposition of Requests Where<br>an Extension Was Taken | With<br>Operations       | Section 70    | Other | Translation or Conversion |
| 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

|                      | 15(a)(i)<br>Interference | 15(a<br>Consu | 15(b) |                      |
|----------------------|--------------------------|---------------|-------|----------------------|
| Length of Extensions | with operations          | Section 70    | Other | Translation purposes |
| 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<br>Government of<br>Canada<br>Institutions | Number of<br>Pages to<br>Review | Other<br>Organizations | Number of<br>Pages to<br>Review |
|--|--|---------------------------------|------------------------|---------------------------------|
| Received during the reporting period           | 1  | 8                               | 0                      | 0                               |
| Outstanding from the previous reporting period | 0  | 0                               | 0                      | 0                               |
| Total  | 1  | 8                               | 0                      | 0                               |
| Closed during the reporting period             | 1  | 8                               | 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

|                           | Number of Days Required to Complete Consultation Request |                     |                     |                      |                       |                       |                             | quests |
|---------------------------|--|---------------------|---------------------|----------------------|-----------------------|-----------------------|-----------------------------|--------|
| Recommendation            | 1 to<br>15<br>Days                                       | 16 to<br>30<br>Days | 31 to<br>60<br>Days | 61 to<br>120<br>Days | 121<br>to 180<br>Days | 181 to<br>365<br>Days | More<br>Than<br>365<br>Days | Total  |
| All disclosed             | 1  | 0                   | 0                   | 0                    | 0                     | 0                     | 0                           | 1      |
| 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                     | 1  | 0                   | 0                   | 0                    | 0                     | 0                     | 0                           | 1      |

# 6.3 Recommendations and completion time for consultations received from other organizations

|                           | Number of days required to complete consultation requests |                     |                     |                      |                       | uests                 |                             |       |
|---------------------------|---|---------------------|---------------------|----------------------|-----------------------|-----------------------|-----------------------------|-------|
| Recommendation            | 1 to<br>15<br>Days  | 16 to<br>30<br>Days | 31 to<br>60<br>Days | 61 to<br>120<br>Days | 121<br>to 180<br>Days | 181 to<br>365<br>Days | More<br>Than<br>365<br>Days | Total |
| 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

|                | Fewer T<br>Pag<br>Proce  |                    | 101-500 Pages<br>Processed |                    | 501-1000<br>Pages<br>Processed |                    | 1001-5000<br>Pages<br>Processed |                    | More than 5000<br>Pages<br>Processed |                    |
|----------------|--------------------------|--------------------|----------------------------|--------------------|--------------------------------|--------------------|---------------------------------|--------------------|--------------------------------------|--------------------|
| Number of Days | Number<br>of<br>Requests | Pages<br>Disclosed | Number<br>of<br>Requests   | Pages<br>Disclosed | Number<br>of<br>Requests       | Pages<br>Disclosed | Number<br>of<br>Requests        | Pages<br>Disclosed | Number<br>of<br>Requests             | Pages<br>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

|                | Fewer T<br>Paç<br>Proce  | •                  | 101–500 Pages<br>Processed |                    | 501-1000<br>Pages<br>Processed |                    | 1001-5000<br>Pages<br>Processed |                    | More than 5000<br>Pages<br>Processed |                    |
|----------------|--------------------------|--------------------|----------------------------|--------------------|--------------------------------|--------------------|---------------------------------|--------------------|--------------------------------------|--------------------|
| Number of Days | Number<br>of<br>Requests | Pages<br>Disclosed | Number<br>of<br>Requests   | Pages<br>Disclosed | Number<br>of<br>Requests       | Pages<br>Disclosed | Number<br>of<br>Requests        | Pages<br>Disclosed | Number<br>of<br>Requests             | Pages<br>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 |
|------------|------------|------------|--------------|-------|
| 0          | 0          | 0          | 0            | 0     |

# 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                        |         | \$123,694 |
| Overtime                        |         | \$0       |
| Goods and Services              |         | \$4,190   |
| Professional services contracts | \$0     |           |
| Other                           | \$4,190 |           |
| Total                           |         | \$127,884 |

#### 10.2 Human Resources

| Resources                        | Person Years<br>Dedicated to Privacy<br>Activities |
|----------------------------------|--|
| Full-time employees              | 1.85   |
| Part-time and casual employees   | 0.00   |
| Regional staff                   | 0.00   |
| Consultants and agency personnel | 0.00   |
| Students                         | 0.00   |
| Total                            | 1.85   |

Note: Enter values to two decimal places.

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