



Canadian Security
Intelligence Service

Service canadien du
renseignement de sécurité



ANNUAL REPORT

2019-2020

Administration of the
PRIVACY ACT

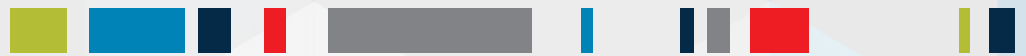


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1. Introduction

The *Privacy Act* (hereafter the “*Act*”) provides Canadian citizens, permanent residents, and individuals present in Canada, the right to access personal information under the control of the Government of Canada. The right of access to personal information is balanced against the legitimate need to protect sensitive information and to maintain the effective functioning of government, while promoting transparency and accountability in government institutions. The *Act* protects an individual’s privacy by preventing others from accessing his or her personal information, and manages the collection, retention, use and disclosure of personal information.

In June 2019, Bill C-58, *An Act to Amend the Access to Information Act and Privacy Act and to make consequential amendments to other Acts*, received Royal Assent. The Bill brought forth the most significant advances to the *Access to Information Act* as well as minor amendments to the *Privacy Act* since they came into force in 1983.

This report is prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*. It covers the way in which the Canadian Security Intelligence Service (CSIS) administered the *Act* from April 1, 2019 to March 31, 2020.

2. CSIS Mandate

CSIS has, for the past 35 years, continued to demonstrate its value to Canadians by providing the Government of Canada with crucial information and advice linked to threats to the security of Canada and of Canadian interests. The *CSIS Act* gives CSIS the mandate to investigate activities suspected of constituting threats to the security of Canada including terrorism and violent extremism, espionage and sabotage, foreign influenced activities, and subversion of government. CSIS also advises the Government on these threats and takes lawful measures to reduce them. In addition, the Service provides security assessments on individuals who require access to classified information or sensitive files within the Government of Canada as well as security advice relevant to the exercise of the *Citizenship Act* or the *Immigration and Refugee Protection Act*. Foreign intelligence collection within Canada is also conducted by CSIS at the request of the Minister of Foreign Affairs or the Minister of National Defence.

In June 2019, the *National Security Act, 2017* received Royal Assent. This legislation modernized the original *CSIS Act* by addressing outdated legal authorities, introducing new safeguards and accountability measures as well as clarifying CSIS’ responsibilities. The legislation addressed specific challenges and provided new modern authorities needed to keep pace with continuous changes in the threat, technological and legal landscape.

3. Organizational Structure

During the 2019-2020 fiscal year, the Access to Information and Privacy (ATIP) Section was transferred from the Assistant Director, Intelligence Directorate to the Assistant Director, Policy and Strategic Partnerships Directorate. Within the Directorate, the ATIP Section is part to the Litigation and Disclosure Branch headed by the Director General. The employees of the ATIP Section are fully dedicated to the administration of the *Privacy Act* and the *Access to Information Act* programs within CSIS, providing high-quality and timely responses to internal and external clients including other government departments as well as providing advice to CSIS employees as they fulfill their obligations under both *Acts*. CSIS Legal Services Branch, which is staffed by Department of Justice (DoJ) lawyers, provides legal advice as required.

This past year, 5 new analyst positions, as well as a casual part time analyst position, were staffed. These positions were created to address the surge of requests from individuals seeking their personal information, the status of their citizenship and immigration files as well as the Service's backlog of access to information requests received from Library and Archives Canada (LAC). As a result, the ATIP section has an establishment of 22 employees to fulfill CSIS' obligations under the *Privacy Act* and the *Access to Information Act*. During this reporting period, the ATIP Section was fully staffed and consisted of a Chief (Coordinator), a Deputy Chief, three unit Heads, 13 full-time Analysts, 1 part-time Analyst, a Privacy Advisor, an Administrative Officer and a Researcher.

The ATIP Section's responsibilities vis-à-vis the *Act* can be divided in 2 categories:

Operations

- receiving and processing all requests in accordance with the *Act*;
- assisting requesters in formulating their requests when required;
- gathering all pertinent records and ensuring that the search for information is rigorous and complete;
- conducting the initial review of the records and providing recommendations to the program areas;
- applying all discretionary and mandatory exemptions under the *Act*;
- conducting and responding to all internal and external consultations;
- consolidating the recommendations;
- assisting the Office of the Privacy Commissioner (OPC) in all privacy related matters including complaints against CSIS; and
- representing CSIS in privacy litigation cases.

Policies and Procedures

- coordinating the annual Info Source update and submission to TBS;
- preparing the annual report on the administration of the *Act*;
- providing ongoing advice and guidance to senior management and departmental staff on all matters related to the privacy;

- promoting privacy awareness and training sessions and ensuring all employees are aware of the obligations imposed by the legislation;
- monitoring departmental compliance with the *Act*, regulations and relevant procedures and policies;
- maintaining the CSIS public reading room;
- developing and maintaining privacy policies and guidelines, when required; and
- participating in ATIP community activities, such as the annual Canadian Access and Privacy Association (CAPA) conference, TBS ATIP community meetings and various working groups.

As defined in section 73.1 of the *Privacy Act*, CSIS did not provide nor receive services related to any power, duty or function to or from another government institution, during this reporting period.

4. Delegation Order

In accordance with section 73(1) of the *Act*, a delegation order signed by the Minister of Public Safety and Emergency Preparedness designates the persons holding the positions of Director of CSIS, Assistant Director of the Policy and Strategic Partnerships Directorate, Director General of the Litigation and Disclosure Branch, as well as the Chief, Deputy Chief and the Unit Heads of the Access to Information and Privacy Section to exercise and perform the duties of the Minister as Head of the institution.

The current delegation order (Annex A) was issued on March 10th 2020, by the Honourable Bill Blair, P.C., M.P.

5. Interpretation of the 2019-2020 statistical report for requests under the *Privacy Act*

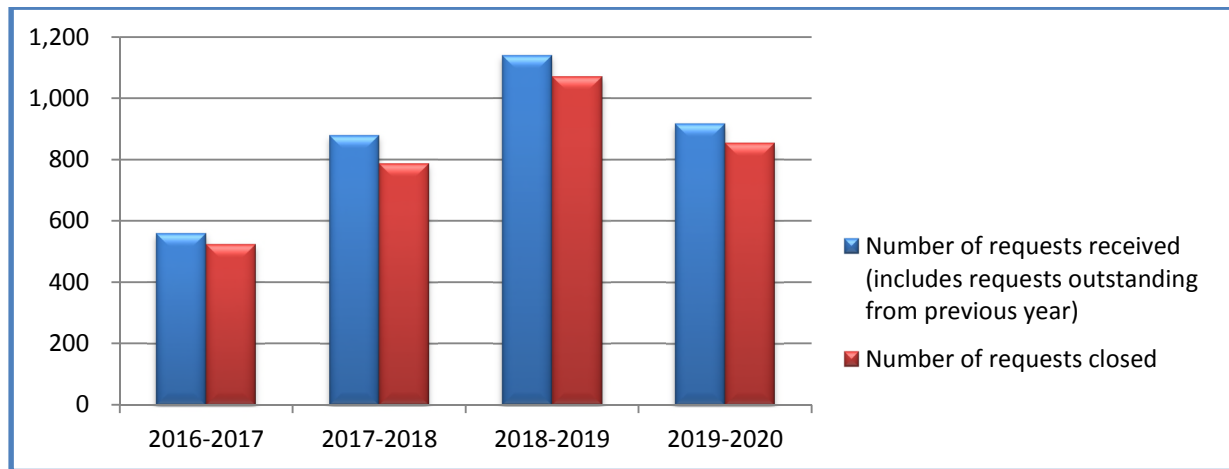
Every year, TBS requires institutions to submit a statistical report on their administration of the *Privacy Act* which contains cumulative data on the application of the legislation during the fiscal year. The CSIS Statistical Report and Supplemental Report for 2019-2020 are included in Annex B and Annex C of this report.

Table 1. Overview of the 2019-2020 statistics on the Service's administration of privacy requests in relation to statistics from the 3 previous years.

Fiscal year	Requests received	Outstanding requests	Requests closed	Requests carried over	Number of pages processed	Number of pages released	On-time compliance rate
2019-2020	844	73	854	63	25,427	10,267	95.7 %
2018-2019	1,048	92	1,071	69	23,564	10,125	97.4 %
2017-2018	844	35	787	92	22,672	11,027	96.8 %
2016-2017	529	29	523	35	12,617	7,090	96.1 %

* The on-time compliance rate for 2019-2020 was impacted by the COVID-19 pandemic and will be discussed further in the report.

Figure 1 - Multi-year trend: Number of requests received and requests closed

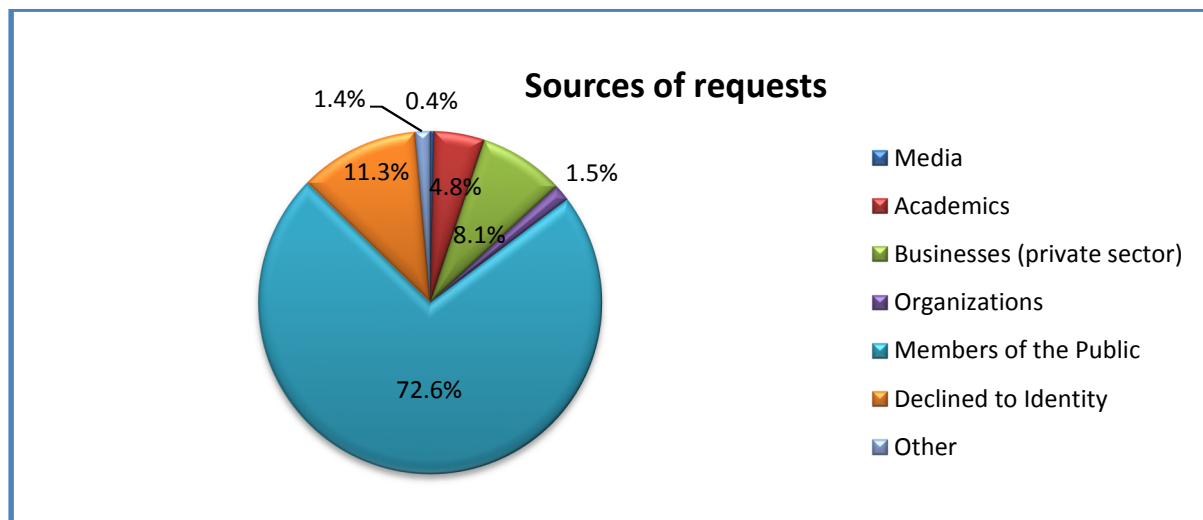


As indicated in table 1, the Service received 844 requests under the *Act* between April 1st, 2019 and March 31st, 2020. This represents a 19.5 per cent decrease from the requests received during the previous reporting period. However, during this reporting period, the ATIP Section reviewed 1,863 pages more that it did during the 2018-2019 fiscal year.

5.1 - Sources of requests

The 844 requests received during this reporting period came from various sources. 72.6 per cent of requests came from members of the public who, largely, were seeking the status of their citizenship and immigration file or seeking to know whether the Service had information on them. 8.1 per cent of requests came from businesses; the most common being law offices seeking the personal information on behalf of their clients who are seeking their immigration and citizenship status.

Figure 2 - Sources of requests



5.2 - Disposition of completed requests

The ATIP Section successfully closed 854 requests during the 2019-2020 reporting period. 44.9 per cent of requests were closed within 1 to 15 days, 42.9 per cent were closed within 16 to 30 days and 4.3 per cent took over 60 days to close. Of the records relevant to these requests, 23.6 per cent were disclosed in part, 20.8 per cent did not exist, and 28.6 per cent for which the existence could neither be confirmed nor denied.

Figure 3 - Multi-year trend: Disposition of closed requests

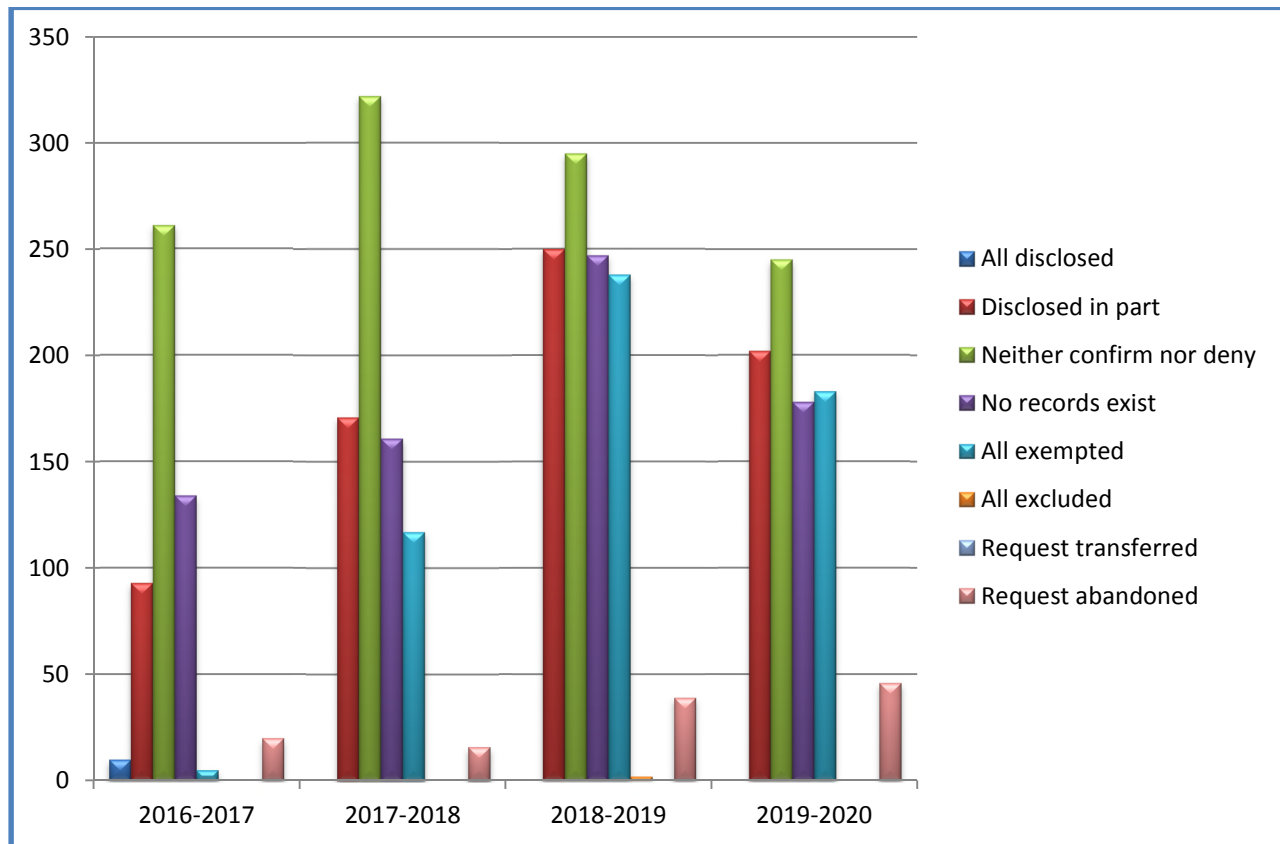
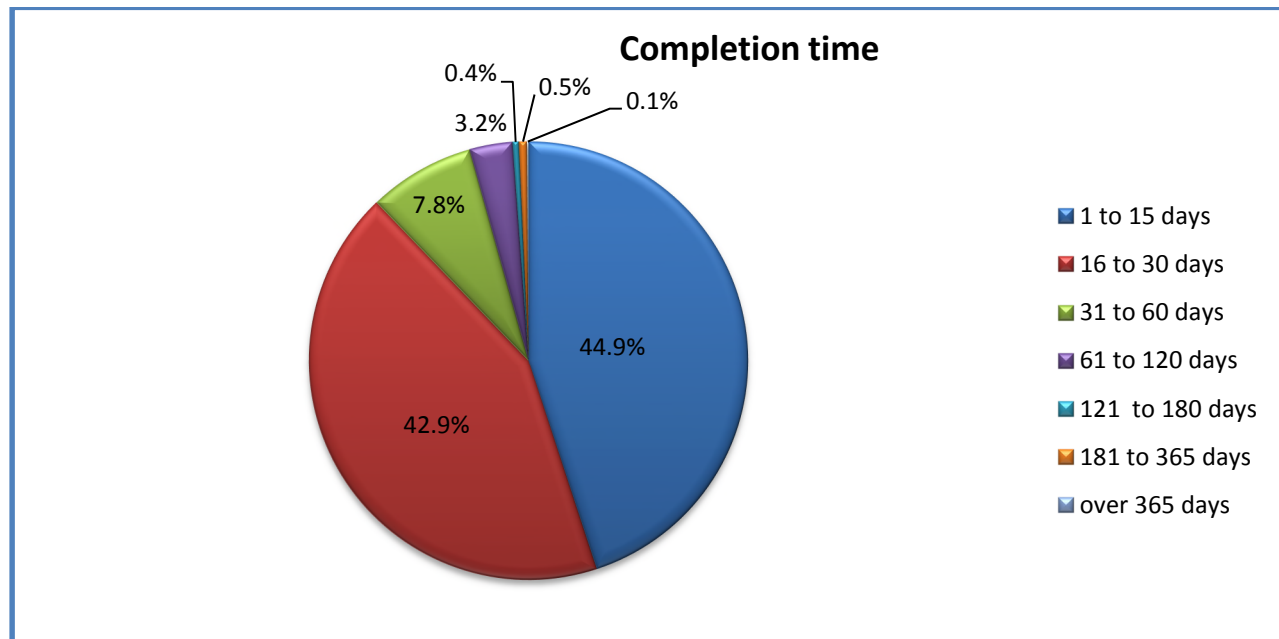


Figure 4 - Completion time



5.3 - Deemed refusals

Out of the 854 requests closed during this reporting period, the ATIP Section successfully closed 817 requests (95.7 per cent) within the legislated timelines; however, the remaining 37 requests (4.3 per cent) were closed past the legislated timelines. It is important to note that out of the 37 requests, extensions were taken on 33 requests. This past year, the main reason for files being closed after the legislated timelines was an interference with operations and/or substantial workloads. The COVID-19 pandemic measures taken by the Service, as well as those taken by the Government of Canada had an impact on files being closed after the legislated timelines.

5.4 - Extensions

The legislation allows for extensions when the response requires internal or external consultations, additional review time due to large amount of records, or when the review could interfere with Service operations. Throughout the reporting period, a total of 87 extensions were taken. 58.6 per cent of the 87 extensions taken were due to the need to consult various internal branches and/or other government departments and 41.4 per cent were due to an interference with operations. 100 per cent of the extensions taken were between 16 to 30 days.

5.5 - Exemptions and exclusions invoked

The *Privacy Act* allows institutions to exempt information from being released for a variety of reasons. The ATIP Section invoked a total of 1,534 exemptions under the *Act* during the reporting period.

Table 2. Breakdown of the exemptions used

Section of the Act	Type of exemption	Times invoked
Section 18	Exempting personal information contained in a personal information bank (exempt bank)	232
Section 19	Exempting personal information obtained in confidence	3
Section 21	Exempting personal information expected to be injurious to the Government of Canada in the conduct of international affairs, and subversive/hostile activities and the defence of Canada	405
Section 22	Exempting personal information obtained from an investigative body in the course of lawful investigations	757
Section 23	Exempting personal information obtained for the purpose of determining whether to grant security clearances	1
Section 25	Exempting personal information that could harm the safety of individuals	2
Section 26	Exempting personal information of individuals other than the individual who made the request.	129
Section 27	Exempting personal information subject to solicitor-client privilege	5

The Act does not apply to information already publically available and excludes from disclosure material such as Cabinet Confidences. The ATIP Section invoked exclusions under the Act, 1 time.

Table 3. Breakdown of exclusions used

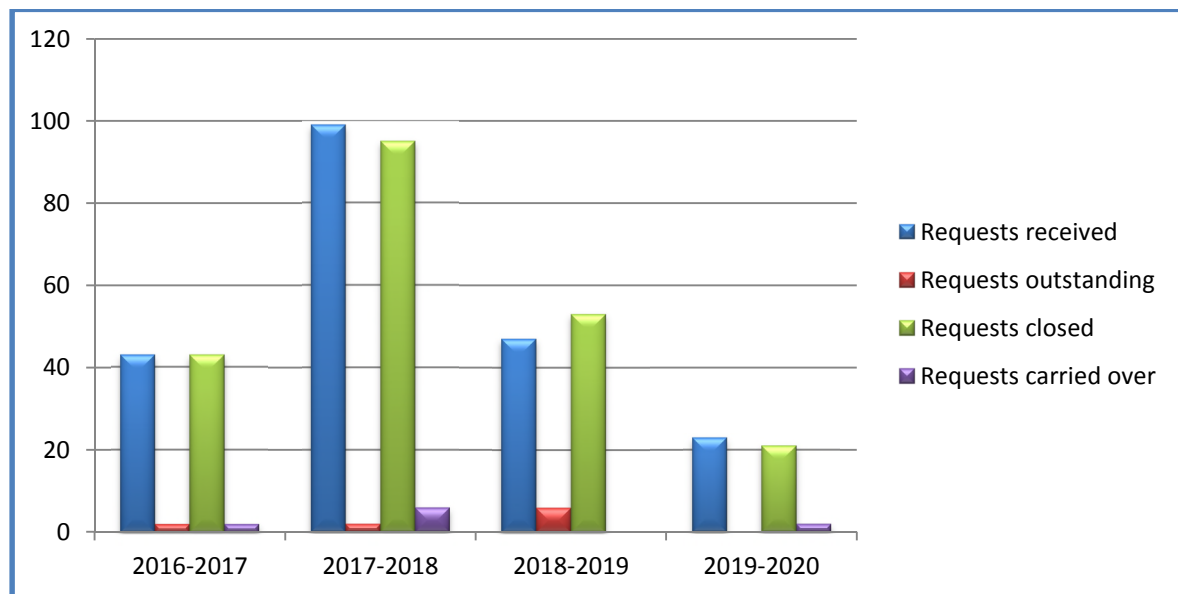
Section of the Act	Exclusion type	Time invoked
Section 70 (1)	Confidence's of the Queen's Privy Council for Canada	1

5.6 - Consultations received from other Government of Canada institutions

During the 2019-2020 fiscal year, the Service received, from other government institutions, 23 consultation requests under the *Privacy Act* involving Service records or matters. There were no requests outstanding from the 2018-2019 fiscal year.

During the 2019-2020 reporting period, the ATIP Section closed 21 privacy consultation requests totaling 636 pages reviewed. 57 per cent of consultation requests were processed in less than 15 days and 43 per cent were closed between 16 and 120 days. There were 2 privacy consultation requests carried over to the next fiscal year.

Figure 5 - Multi-Year trend: Consultations received from other institutions



5.7 – Other requests:

The ATIP Section also acted as a resource for CSIS executives by offering advice and guidance on provisions of the legislation. The ATIP Section provided assistance, over 180 times, on a variety of matters including, but not limited to, releases of information made by CSIS outside the parameters of the *Act*.

Throughout 2019-2020, the ATIP Section continued to receive telephone calls and emails from employees of the Service as well as from the public seeking direction on how to obtain information and/or how to submit a request under the *Privacy Act*. The ATIP Section administration team provided guidance in a professional manner and often directed these individuals to the ATIP Online Request Service website for additional information.

5.8 – Impact of Covid-19 measures:

As indicated in table 1, the on-time compliance rate for this reporting period was slightly impacted by the Government of Canada's measures to stop the spread of the Covid-19 virus. The Service dropped its on-time compliance rate by 1 per cent in the last two weeks of the 2019-2020 fiscal year. Prior to March 14th, 2020, the ATIP Section's on-time compliance rate for requests made under the *Privacy Act* was 96.7 per cent with a 3.3 per cent deemed refusal rate.

On March 14th, 2020, the Service's Business Continuity Plan was activated. As part of the plan, the ATIP Section was deemed non-essential. As a result, privacy requests received between March 14th, 2020 and March 31st, 2020 were neither registered nor processed. The ATIP Section was not able to work remotely due to the handling of classified materials/records and due to technical limitations. While there was no movement on requests during that time, the Chief and the Deputy Chief remained available to provide advice on matters related to the *Privacy Act*.

Of the 63 requests carried over to 2020-2021, 45 remained outstanding from 2019-2020 and 18 were new requests received after March 14th, 2020. The real impact of the measures taken to combat the virus will be presented in the 2020-2021 Annual Report on the Administration of the *Privacy Act*.

6. Training and Awareness

During the 2019-2020 reporting period, ATIP prepared and offered 3 presentations further to the Royal Assent of Bill C-58 (*An Act to amend the Access to Information Act and the Privacy Act and to make consequential amendments to other Acts*) to the Executive, employees of the Policy and Strategic Partnerships Directorate as well as the management team of the Deputy Director Administration and Chief Financial Officer. The ATIP section also provided a presentation to another government of Canada institution on the way it processes complaints. The presentation was well-received and was deemed helpful. Additionally, the ATIP Section conducted awareness sessions through ATIP e-learning narrated slides. The narrated slides form part of the new employee orientation program which is required for all new employees. All other Service employees have the ability to reference the narrative slides at any given time through the e-learning application. The narrated slides provides participants with an overview of the *Act* and the *Access to Information Act*, promotes a better comprehension of individual responsibilities and obligations relating to the *Acts* and offers an greater understanding of the internal ATIP process. During the 2019-2020 fiscal year, 266 Service employees viewed the ATIP online module.

7. Policies, Guidelines, Procedures and Initiatives

There were no policies, guidelines or procedures implemented during this reporting period as a result of new TBS policies and directives or issues raised by the Office of the Privacy Commissioner (OPC) further to the *Privacy Act*.

However, it was decided that the Privacy Advisor position, which had been a part of the ATIP Section since July 2018, would be transferred to the Service's Compliance Unit during the 2020-2021 reporting period. The Privacy Advisor's responsibilities include ensuring compliance with the TBS policies on Privacy Impact Assessments (PIA) and privacy breaches as well as privacy practices. The Privacy Advisor will nevertheless be required to consult the ATIP Section further to s.10 and s.71(6) of the *Privacy Act*.

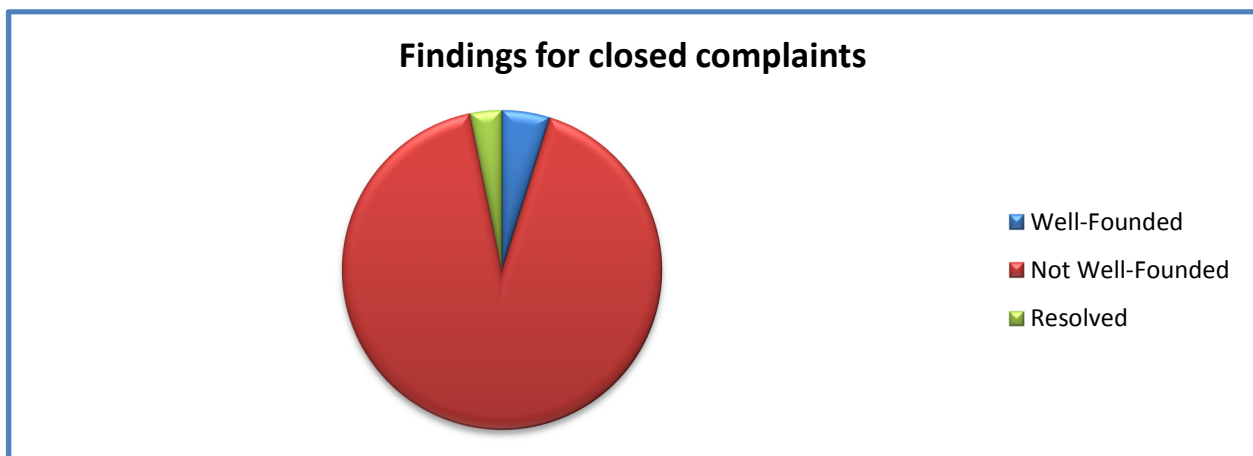
8. Issues and Actions Taken on Complaints or Audits

Section 29 (1) of the *Act* provides requesters with the right to file a complaint with the Office of the Privacy Commissioner (OPC) should they be displeased with the response to their access to information request. Reasons for complaints include the refusal of an institution to disclose personal information, personal information used and disclosed for other purposes, delays in receiving a response, etc. 64 complaints were registered with the OPC during the 2019-2020 fiscal year. This represents 7.5 per cent of the total number of *Privacy Act* requests received throughout the fiscal year.

Table 4. Complaint and investigation notices received

Section of the Act	Number of complaints
Section 31	14
Section 33	33
Section 35	15
Total	64

OPC investigators closed and issued their findings on 64 complaints. They determined that 57 (89 per cent) were not well-founded, 3 were well-founded but resolved immediately and 2 were resolved at the early resolution stage.



CSIS continues to work closely with the OPC in order to resolve complaints in an efficient and timely manner. The Service reviews the outcome of all investigations by the OPC and where appropriate, integrates lessons learned into corporate processes.

There were 2 Court actions filed against CSIS regarding the *Act*. The Court actions remain ongoing.

9. Monitoring Compliance

The unit heads are responsible for monitoring compliance and reporting issues to the chief ATIP. The monitoring is continuously conducted via reports produced by the ATIP Case Management Software. The ATIP Coordinator conveys compliance issues to the DG, Litigation and Disclosure Branch.

10. Material Breaches

There was one material privacy breach reported to the OPC and to the Treasury Board Secretariat of Canada's, Information and Privacy Policy Division during the last week of the 2018-2019 reporting period which is why it was not included in the 2019-2020 statistical report. However, since the OPC received the Material Breach Subject Report on April 11th, 2019, it is included as part of this report. The

breach was due to a technical glitch involving the administration of an employee questionnaire. The breach impacted 53 employees of the Service. The OPC assessed the particulars of the breach, the nature and sensitivity of the information at issue, the number of individuals directly affected by it and the consequences of the breach. The OPC also carefully considered the measures taken by the Service to contain the breach as well as efforts made to prevent the recurrence of a similar breach. Being satisfied with how the Service handled the breach, the OPC closed the matter on July 22nd, 2019. The Service takes the privacy of its employees as well as Canadians seriously and continues to take appropriate measures and put in place proper safeguards to prevent future breaches.

11. Privacy Impact Assessments (PIA)

The TBS Privacy Impact Assessment (PIA) Directive took effect on April 1st, 2010. The PIA is a process that helps determine whether an initiative involving the use and collection of personal information raises privacy risks. It measures, describes and quantifies the risks, and proposes solutions to eliminate or mitigate them to an acceptable level prior to the implementation of new or substantially modified programs or activities.

Since the ATIP section was selected as the CSIS Policy Center for the PIA development and approval process, a Privacy Advisor position was created. This position was staffed in June 2018. In consultation with subject matter experts within the Service, the Privacy Advisor has the responsibility to assess whether modified or new programs /activities have an impact on privacy and warrant the preparation of a PIA based on the TBS Directive on PIAs. When a PIA is required, the Privacy Advisor will initiate the process, determine the appropriate format for the PIA, coordinate the completion of the PIA, seek proper approvals, submit the PIA to the President of TBS and to the OPC and respond to the OPC's observations and/or recommendations. As mentioned above, the Privacy Advisor position will be transferred to another section during the 2020-2021 fiscal year.

During this reporting period:

- 21 consultations with CSIS subject matter experts took place to determine whether a PIA was required for new or modified programs/initiatives/activities;
- No PIAs were approved and sent to the OPC;
- 1 PIA was pending approval at the end of the reporting period;
- 2 PIAs were in process;
- 2 responses to the OPC's recommendations were delivered; and
- 2 PIA summaries were published to the CSIS website: <https://www.canada.ca/en/security-intelligence-service/corporate/transparency/access-to-information-and-privacy/privacy-impact-assessment.html>

For national security reasons, the Service only publishes the summaries of unclassified PIAs.

12. Public Interest Disclosures

No disclosures were made under paragraph 8(2)(m) of the *Privacy Act* during the reporting period.

13. Other

Throughout the 2019-2020 fiscal year, the ATIP Section incurred \$881,540 in salary costs and \$1,845 in other costs associated with the administration of the *Privacy Act*.

Annex A

Privacy Act Delegation Order

Arrêté sur la délégation en vertu de la Loi sur la protection des renseignements personnels

The Minister of Public Safety and Emergency Preparedness, pursuant to section 73(1) of the *Privacy Act**, hereby delegates to the persons holding the positions set out in the schedule hereto to exercise the powers and perform the duties and functions of the Minister as the head of a government institution, that is, the Canadian Security Intelligence Service, under the sections of the *Act* set out in the schedule opposite each position.

En vertu de l'article 73(1) de la *Loi sur la Protection des renseignements personnels**, le Ministre de la Sécurité publique et de la Protection civile délègue aux titulaires des postes mentionnés à l'annexe ci-après, les attributions dont il est, en qualité de responsable d'une institution fédérale, c'est-à-dire, le Service canadien du renseignement de sécurité, investi par les articles de la *Loi* mentionnés en regard de chaque poste.

Schedule

Annexe

<u>Position</u>	<u>Privacy Act and Regulations</u>
<u>Poste</u>	<u>Loi sur la protection des renseignements personnels et règlements</u>
Director of CSIS / Directeur du SCRS	Full Authority / Autorité absolue
Assistant Director, Policy and Strategic Partnerships / Directeur adjoint, Politiques et partenariats stratégiques	Full Authority / Autorité absolue

Director General, Litigation and Disclosure /
Directeur général, Litiges et divulgations

Full Authority / Autorité absolue

Chief, ATIP / Chef, AIPRP

Full Authority / Autorité absolue

Deputy Chief, ATIP / Sous-chef, AIPRP

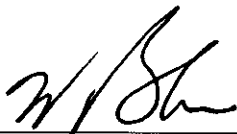
Full Authority / Autorité absolue

Unit Heads, ATIP / Chefs d'équipe, AIPRP

Full Authority / Autorité absolue

Dated, at the City of Ottawa
this 10 day of March 2020.

Daté, en la ville d'Ottawa,
le ____ ième jour de ____ 2020.



Bill Blair, P.C., M.P.
Minister of Public Safety and
Emergency Preparedness

Bill Blair, C.P., député
Ministre de la Sécurité publique
et de la Protection civile

Annex B



Statistical Report on the *Privacy Act*

Name of institution: Canadian Security Intelligence Service (CSIS)

Reporting period: 2019-04-01 to 2020-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	844
Outstanding from previous reporting period	73
Total	917
Closed during reporting period	854
Carried over to next reporting period	63

Section 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	0	0	0	0	0	0	0	0
Disclosed in part	40	71	55	27	4	4	1	202
All exempted	102	75	5	0	0	1	0	183
All excluded	0	0	0	0	0	0	0	0
No records exist	89	85	4	0	0	0	0	178
Request abandoned	31	14	1	0	0	0	0	46
Neither confirmed nor denied	122	121	2	0	0	0	0	245
Total	384	366	67	27	4	5	1	854

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	232	22(1)(a)(i)	347	23(a)	1
19(1)(a)	2	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	4	24(a)	0
19(1)(c)	0	22(1)(b)	404	24(b)	0
19(1)(d)	1	22(1)(c)	2	25	2
19(1)(e)	0	22(2)	0	26	129
19(1)(f)	0	22.1	0	27	5
20	0	22.2	0	27.1	0
21	405	22.3	0	28	0
		22.4	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	1	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

Paper	Electronic	Other
69	133	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
25,427	10,267	676

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	0	0	0	0	0	0	0	0	0	0
Disclosed in part	169	3,372	29	4,208	2	1,174	2	1,513	0	0
All exempted	182	0	1	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	46	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	245	0	0	0	0	0	0	0	0	0
Total	642	3,372	30	4,208	2	1,174	2	1,513	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	157	0	0	0	157
All exempted	6	0	0	0	6
All excluded	0	0	0	0	0
Request abandoned	3	0	0	0	3
Neither confirmed nor denied	22	0	0	0	22
Total	188	0	0	0	188

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	817
Percentage of requests closed within legislated timelines (%)	95.7

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
37	21	11	5	0

2.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	3	16	19
16 to 30 days	1	4	5
31 to 60 days	0	3	3
61 to 120 days	0	4	4
121 to 180 days	0	5	5
181 to 365 days	0	0	0
More than 365 days	0	1	1
Total	4	33	37

2.8 Requests for translation

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

Section 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

Section 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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

Number of requests where an extension was taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
87	0	0	36	0	0	34	17	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	36	0	0	34	17	0
31 days or greater	0	0	0	0	0	0	0	0
Total	0	0	36	0	0	34	17	0

Section 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	23	724	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	23	724	0	0
Closed during the reporting period	21	636	0	0
Carried over to the next reporting period	2	88	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

Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
14	33	15	2	64

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks

9.1 Privacy Impact Assessments

Number of PIA(s) completed	0
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	15	0	0	0

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

Section 11: Resources Related to the Privacy Act

11.1 Costs

Expenditures		Amount
Salaries		\$881,540
Overtime		\$0
Goods and Services		\$1,845
• Professional services contracts	\$0	
• Other	\$1,845	
Total		\$883,385

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	11.50
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	11.50

Note: Enter values to two decimal places.

Annex C

2019-2020 Supplemental Statistical Report – Requests affected by COVID-19 measures

Table 1 - The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Requests Received	Number of requests
Received from 2019-04-01 to 2020-03-13	826
Received from 2020-03-14 to 2020-03-31	18
Total	844

Table 2 - The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Requests closed	Number of requests closed within the legislated timelines	Number of requests closed past the legislated timelines
Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period	817	37
Received from 2020-03-14 to 2020-03-31	0	0
Total	817	37

Table 3 - The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Requests carried over	Number of requests
Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	45
Received from 2020-03-14 to 2020-03-31 and were carried over to the 2020-2021 reporting period	18
Total	63