



The National Battlefields  
Commission

Commission des champs  
de bataille nationaux



# Annual reports 2023-24

ON *PRIVACY ACT*

National Battlefields Commission | July 2024 |



## **ANNUAL REPORT ON THE *PRIVACY ACT*, 2023-24**

### **INTRODUCTION**

The *Privacy Act* relates to individuals' right to access and correct personal information the Government of Canada holds about them or the Government's collection, use and disclosure of their personal information in the course of providing services (e.g., old age pensions or employment insurance).

The National Battlefields Commission (NBC) is an institution subject to the *Privacy Act* and, pursuant to section 72 of the Act, it is required to submit to Parliament an annual report on the administration of this Act within the institution.

The NBC is an agency of the Government of Canada and is part of the portfolio of the Minister of Canadian Heritage. Created in 1908 under the *Act respecting the National Battlefields at Quebec City*, SC 1908, c 57, the NBC, in accordance with its mandate, is responsible for the administration, management, conservation and promotion of Battlefields Park (located in Quebec City), and manages funds allocated for this purpose.

### **ORGANIZATIONAL STRUCTURE**

Requests are sent to the General Management, which looks after personal files and ensures that requests are processed within the legal time frames, in consultation with the Secretary-Director General, who processes them within the time frames prescribed by the Act.

The NBC has not entered into or been a party to any contract for the provision of services pursuant to article 73.1 of the Act.

### **DELEGATION ORDER**

As Access to Information and Privacy Coordinator, the Secretary-Director General is fully empowered to administer the *Privacy Act*, as appears from a signed copy of the Delegation Order attached to this report. The head of the NBC has not delegated her powers and responsibilities under the Act.



## PERFORMANCE FOR 2023-24

As demonstrated in the statistical report, no application was received during the reporting period.

The table below shows the multi-year trends in the number of privacy requests received and completed:

Period	Number of requests received during the period	Number of requests processed during the period
2023-24	0	0
2022-23	0	0
2021-22	0	0
2020-21	0	0
2019-20	1	1

No applications or complaints are active and pending from a previous reporting period.

The form for the statistical report on the *Privacy Act*, submitted the Treasury Board Secretariat, is attached.

## TRAINING AND AWARENESS

“Access to Information in the Government of Canada” (COR503-FR) and the “Access to Information and Privacy Fundamentals (COR502-FR) were attended by one participant.

## POLICIES, GUIDELINES AND PROCEDURES

In 2023-24, the NBC maintained its directive on the protection of personal information, which consists of inserting a confidentiality notice at the bottom of transmitted e-mails. It also continued its practice of including confidentiality clauses in its agreements.

The NBC has not developed any new policies, guidelines or procedures during this reporting period.

## INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

No initiatives or projects have been developed.

## SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

In the context where the NBC did not receive any complaints during the reporting period, no specific issues were raised.



## MATERIAL PRIVACY BREACHES

No material privacy breaches were reported to the Office of the Privacy Commissioner and the Treasury Board of Canada Secretariat in 2023-24.

## PRIVACY IMPACT ASSESSMENTS

The NBC did not conduct any privacy impact assessment during the reporting period.

## PUBLIC INTEREST DISCLOSURES

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

## MONITORING COMPLIANCE

Follow-up on processing times is normally carried out by General Management, on a weekly basis when requests are being processed. The Secretary-Director General is then informed of the follow-up given to requests.

For the 2023-24 reporting period, given the lack of requests, no monitoring or control was carried out during processing, in particular to ensure compliance with deadlines.

The ad hoc and divergent nature of the requests received during other reporting periods did not suggest any similarities that would allow the requested information to be grouped together for the purpose of being made available to the public by other means.

In the event of a request, the General Management level is informed.

Appendix A

The National Battlefields Commission		Spending Authority																						Other Authorities											
Delegated Financial Signing Authorities Chart		Expenditure Initiation Section 32 FAA - Commitment Authority													Section 34 FAA Contract Performance																				
Position Title	Area Of Authority	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31			
Chairman	Commission	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F				
Secretary	Commission	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F				
Assistant Secretary	Commission	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F				
Financial Services Agent	Commission	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F				
Pay & Benefits Assistant	Commission																																		
Material Management Officer & Accountant Assistant	Commission																																		
Surety Service Chief	Service																																		
Maintenance Service Officer	Service																																		
Green Environment Officer	Service																																		
Cultural and Technical Service Officer	Service																																		
Customer's Service Officer	Service																																		
Communication Officer	Service																																		
Executive Assistant	Service																																		
RECOMMENDED BY:		APPROVED BY: <i>John Turner</i> Minister of Canadian Heritage, Status of Women and Official Languages																																	

NOTES : *See below*

Chart must be read in conjunction with the Notes to the Delegated Financial Signing Authorities Chart and Appendix A, which defines terms/conditions and financial limitations to the Delegated Financial Signing Authorities Chart.

~ (F) means that the position has been delegated full authorities subject to specific authorities and dollar limitations as described in Appendix A for the corresponding column.

~ amounts are specified e.g. 2 = \$2,000, these amounts cannot be exceeded. In addition, a blank cell means that no authority has been granted.

## Statistical Report on the *Privacy Act*

Name of institution: National Battlefields Commission  
Reporting period: 2023-04-01 to 2024-03-31

### Section 1: Requests Under the *Privacy Act*

#### 1.1 Number of requests received

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting periods	0
• Outstanding from previous reporting period	0
• Outstanding from more than one reporting period	0
Total	0
Closed during reporting period	0
Carried over to next reporting period	0
• Carried over within legislated timeline	0
• Carried over beyond legislated timeline	0

#### 1.2 Channels of requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

## 2.1 Number of informal requests

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting periods	0
• Outstanding from previous reporting period	0
• Outstanding from more than one reporting period	0
<b>Total</b>	<b>0</b>
Closed during reporting period	0
Carried over to next reporting period	0

## 2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
<b>Total</b>	<b>0</b>

### 2.3 Completion time of informal requests

## 2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

## Section 3. Requests Closed During the Reporting Period

### 3.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	0 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
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

### 3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
8(2)	0	22(1)(a)(i)	0	23(a)	0
9(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
9(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
9(1)(c)	0	22(1)(b)	0	24(b)	0
9(1)(d)	0	22(1)(c)	0	25	0
9(1)(e)	0	22(2)	0	26	0
9(1)(f)	0	22.1	0	27	0
9(1)(g)	0	22.2	0	27.1	0
9(1)(h)	0	22.3	0	28	0
	22.4		0		

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

### **3.4 Format of information released**

Paper	Electronic					Other
	E-record	Data set	Video	Audio		
0	0	0	0	0	0	0

### 3.5 Complexity

### 3.5.1 Relevant pages processed and disclosed for paper, e-record and dataset formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	0

### 3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

**3.5.3 Relevant minutes processed and disclosed for audio formats**

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

**3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests**

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

**3.5.5 Relevant minutes processed and disclosed for video formats**

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

### 3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

### 3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	Enregistré dans ce PC
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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

### 3.6 Closed requests

#### 3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

### 3.7 Deemed refusals

#### 3.7.1 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
0	0	0	0	0

#### 3.7.2 Request 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 timeline 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



## 6.2 Length of extensions

Length of Extensions	Further review required to determine exemptions	15(a)(i) Interference with operations			15 (a)(ii) Consultation			15(b) Translation purposes or conversion
		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	0	0	0	0	0	0
31 days or greater								0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## Section 7: Consultations Received From Other Institutions and Organizations

### 7.1 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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Closed during the reporting period	0	0	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

#### **7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada**

**Section 8: Completion Time of Consultations on Cabinet Confidences**
**8.1 Requests with Legal Services**

Number of Days	Fewer Than 100 Pages Processed		100-500 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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**8.2 Requests with Privy Council Office**

Number of Days	Fewer Than 100 Pages Processed		100-500 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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Section 9: Complaints and Investigations Notices Received**

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

**10.1 Privacy Impact Assessments**

Number of PIAs completed	0
Number of PIAs modified	0

**10.2 Institution-specific and Central Personal Information Banks**

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	0	0	0
Central	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Section 11: Privacy Breaches****11.1 Material Privacy Breaches reported**

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

**11.2 Non-Material Privacy Breaches**

Number of non-material privacy breaches	0
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**Section 12: Resources Related to the Privacy Act****12.1 Allocated Costs**

Expenditures		Amount
Salaries		\$0
Overtime		\$0
Goods and Services		\$0
- Professional services contracts	\$0	
- Other	\$0	
<b>Total</b>		<b>\$0</b>

**12.2 Human Resources**

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.000
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
<b>Total</b>	<b>0.000</b>

Note: Enter values to three decimal places

## Supplemental Statistical Report on the Access to Information Act and the Privacy Act

Name of institution: National Battlefields Commission

Reporting period: 2023-04-01 to 2024-03-31

### Section 1: Open Requests and Complaints Under the Access to Information Act

1.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
Total	0	0	0

Row 11, Col. 3 of Section 1.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the Access to Information Act

1.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	0

## 2.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

Row 11, Col. 3 of Section 2.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

**2.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.**

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
<b>Total</b>	<b>0</b>

**Section 3: Social Insurance Number**

Has your institution begun a new collection or a new consistent use of the SIN in 2023-24?

Yes

**Section 4: Universal Access under the Privacy Act**

How many requests were received from foreign nationals outside of Canada in 2023-24?

0

Row 1, Col. 1 of Section 4 must be equal to or less than Row 1, Col. 1 of Section 11 of the 2023-24 Statistical Report on the Privacy Act

Canada