

Public Health Agency of Canada

Annual Report on the
Access to Information Act and the *Privacy Act*

2019-2020

**TO PROMOTE AND PROTECT THE HEALTH OF CANADIANS THROUGH LEADERSHIP, PARTNERSHIP,
INNOVATION AND ACTION IN PUBLIC HEALTH.**

—Public Health Agency of Canada

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Rapport annuel 2019-2020 sur la *Loi sur l'accès à l'information* et la *Loi sur la protection des renseignements personnels*

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Introduction

The Public Health Agency of Canada is pleased to present to Parliament its consolidated annual report on the administration of Access to Information and Privacy (ATIP) services, in accordance with section 94 of the *Access to Information Act* (ATIA) and section 72 of the *Privacy Act* and section 20 of the *Service Fees Act*. The report describes activities that support compliance with these laws for the fiscal year beginning April 1, 2019 and ending March 31, 2020.

This is the first time that the Public Health Agency of Canada is tabling a report that combines reporting on the delivery of services under the ATIA and *Privacy Act*, while ensuring the requirements of each are clearly laid out. The delivery of these programs are very much intertwined, and thus, in the spirit of transparency, ease of access, efficiency and continuous improvement, an integrated report outlining the Agency's accomplishments in delivering these services to Canadians is presented.

About the Public Health Agency of Canada

Public Health Agency of Canada's mission is to promote and protect the health of Canadians through leadership, partnership, innovation and action in public health.

The role of Public Health Agency of Canada is to:

- Promote health;
- Prevent and control chronic diseases and injuries;
- Prevent and control infectious diseases;
- Prepare for and respond to public health emergencies;
- Serve as a central point for sharing Canada's public health expertise with the rest of the world;
- Apply international research and development to Canada's public health programs; and
- Strengthen intergovernmental collaboration on public health and facilitate national approaches to public health policy and planning.

For more information about Public Health Agency of Canada, please [visit our website](#).

Purpose of the Acts

The ATIA gives Canadian citizens and permanent residents of Canada the right to access information contained in federal government records, subject to certain specific and limited exceptions. The ATIA complements, but does not replace, other means of obtaining government information.

The *Privacy Act* protects an individual's privacy by setting out provisions related to the collection, retention, accuracy, disposal, use and disclosure of personal information. It also gives Canadian citizens and permanent residents of Canada the right of access to information about themselves held by the federal government, with certain specific and limited exceptions.

Organizational Structure

Responsibilities for ATIP services are divided between two Divisions, both housed under the Planning, Integration and Management Services Directorate (PIMSD) of Health Canada's Corporate Services Branch (CSB). ATIP Operations Division manages the processing of requests under both the ATIA and the *Privacy Act*, while the Privacy Management Division is responsible for privacy policy and providing guidance to programs.

Access to Information and Privacy Operations Division

The ATIP Coordinator oversees the development, coordination and implementation of policies, guidelines, systems and procedures that ensure the effective processing of requests made under the ATIA and the *Privacy Act*. In addition, ATIP Operations Division reviews information to support various disclosures such as appropriate sharing of investigation reports and proactive publication under Part 2 of the ATIA, as well as supporting Parliamentary Affairs in the collection and review of records for Parliamentary Motions to Produce Papers. The ATIP Coordinator is also responsible for the implementation of relevant government-wide policies, systems and procedures.

In 2019–2020, ATIP Operations Division utilized 4.25 FTEs to process PHAC ATIP requests, with the support of consultant services (0.34 FTEs), part-time and casual employees (0.14 FTEs), and a student (0.02 FTEs) for a total complement of 4.75 FTEs. This includes staff administering both the ATIA and the *Privacy Act*.

Privacy Management Division

The primary functions of the Privacy Management Division include ensuring compliance of Public Health Agency of Canada's program delivery with the provisions of the *Privacy Act* and the policies and directives of the Treasury Board Secretariat (TBS). Responsibilities include:

- The development of privacy policies, procedures and practices;
- The delivery of privacy training and awareness programs to staff;
- Assessing and reporting on privacy breaches;
- Coordinating the department's input of InfoSource; and
- Providing privacy analysis and advice using a number of tools including Privacy Impact Assessments (PIA) and Privacy Protocols.

In 2019-2020, the Privacy Management Division was made up of 3.00 full-time equivalent (FTE) employees with the support of 0.46 FTEs in consultant services, as well as part-time and casual employees of 0.74 FTEs, for a total resource complement of 4.20 FTEs. These figures include administrative support, management, reporting, monitoring, advisory services and policy resources, which contribute to the overall support of the operations of the application of the *Privacy Act*.

Service Agreement

ATIP Operations Division and Privacy Management Division provide services to both Public Health Agency of Canada and Health Canada, and do so as part of the Shared Services Partnership Agreement. The changes to the ATIA and *Privacy Act* enacted in June 2019 (Bill C-58) did not impact the way these services are delivered to both institutions.

Although ATIP services are provided to both institutions, the statistics and financial data provided in this report are only for Public Health Agency of Canada.

Governance

Initiatives related to access to information and privacy are governed through the Public Health Agency of Canada's Policy-Operations Committee. ATI and privacy matters requiring a higher level of oversight are also brought forward to Public Health Agency of Canada's Executive Committee for strategic direction.

Delegation of Authority

In keeping with Treasury Board Secretariat (TBS) recommendations on best practices, the Delegation Order extends authorities to multiple positions including the President, the Corporate Services Branch's Assistant Deputy Minister, the Director General of Planning Integration and Management Services Directorate, and the ATIP Coordinator. As appropriate, certain administrative authorities are delegated to various senior levels within the ATIP Operations Division and Privacy Management Division to support the effective and efficient administration of the ATIA and the *Privacy Act*. The most recent delegation order, signed by the Minister of Health, is included in this report ([Appendix A](#)).

Performance for 2019-2020

In 2019-2020, Public Health Agency of Canada received 190 requests and responded to 191. In order to ensure that headway is being made on maintaining a low inventory of active requests, in addition to striving to meet legislated timelines, Public Health Agency of Canada's operational goal is to close as many requests as received.

Type of Request	Received	Closed
Access to Information	138	130
Access Informal	33	38
Privacy	19	23
Total	190	191

The following section of the report includes an interpretation and explanation of the data contained in Public Health Agency of Canada's Statistical Report, which summarizes Access to Information (ATI) and Privacy-related activity for the period between April 1, 2019 and March 31, 2020 ([Appendix B – ATI](#) and [Appendix C – Privacy](#)).

Access to Information Act

Informal Requests

Requests can be made for records previously released under the ATIA, which are referred to as ‘Access Informal Requests’. Summaries of previously released ATI requests are posted monthly on the [Open Government](#) website, as part of the Government of Canada’s commitment to openness and transparency. Public Health Agency of Canada processed 38 Access Informal requests in 2019-2020, an increase of 27 over the previous year.

Caseload/Carry Forward

In 2019-2020 Public Health Agency of Canada received 138 new ATI requests, an increase of 39 from the previous year. The ATIP Operations Division has continued to take steps to manage the increasing volume, including hiring additional staff, taking steps to increase employee retention, and adjusting processes to find efficiencies. These measures enabled Public Health Agency of Canada to close almost as many ATI requests as were received, with 130 closed during the year. The Agency was on track to close more than were received, however the abrupt slowdown experienced in March due to COVID-19 measures did not make this possible. Nonetheless, Public Health Agency of Canada managed to close almost as many ATI requests as received, and is carrying forward fewer files than in the previous year.

Access to Information Requests Received & Completed

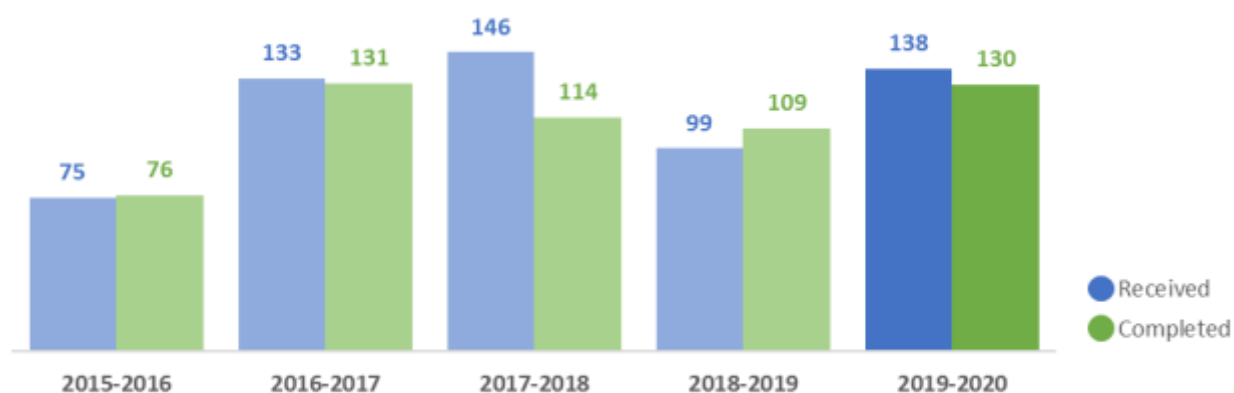


Figure 1 ATI Requests Received and Completed each fiscal year from 2015-2016 to 2019-2020

Key Statistics by Fiscal Year

Fiscal Year	Number of Requests Received	Number of Requests Carried Over	Total Caseload	Number of Requests Closed	# of Pages Reviewed for Closed Files
2015–2016	75	37	112	76	7,350
2016–2017	133	36	169	131	9,627
2017–2018	146	38	184	114	25,844
2018–2019	99	70	169	109	19,784
2019–2020	138	60	198	130	13,177

Source of Requests Under the *Access to Information Act*

Public Health Agency of Canada's requests mostly came from the media and the general public in 2019-2020, which is consistent with previous years. Only a small number of requests came from businesses, organizations and academia.

Proportion of Requests Among Sources

Source	Number of Requests	Proportion of Requests	Change from 2018-2019
Media	51	37%	+10%
Public	50	36%	+3%
Business (Private Sector)	16	12%	+2%
Organizations (e.g. political party, association, union)	8	6%	+2%
Decline to Identify	8	6%	-11%
Academia	5	3%	-2%
Total	138	100%	

Processing Time for Requests

A total of 83 requests (64%) were processed within the statutory deadlines. The majority of files where legislated timelines were not met were due to interference with operations (i.e. workload).

Extensions

The vast majority of extensions (71%) invoked under the ATIA were to conduct consultations on the records, while 29% were due to voluminous records (interference with operations). Of the 130 files closed in 2019–2020, Public Health Agency of Canada invoked 42 extensions under section 9(1) of the ATIA.

Consultations Completed From Other Institutions

In addition to processing its own requests, Public Health Agency of Canada also completes consultations received from other institutions and organizations to consent to the disclosure of the Agency's information. In 2019-2020, Public Health Agency of Canada completed 86 consultations received from other Government of Canada institutions and 4 from other organizations, reviewing 2,351 pages of records. In the majority of cases, Public Health Agency of Canada consented to full disclosure of the records.

Disposition of Completed Requests

Approximately 55% of the requests completed in 2019-2020 were either disclosed in part (43%) or all disclosed (12%). The breakdown of disposition of completed files is as follows:

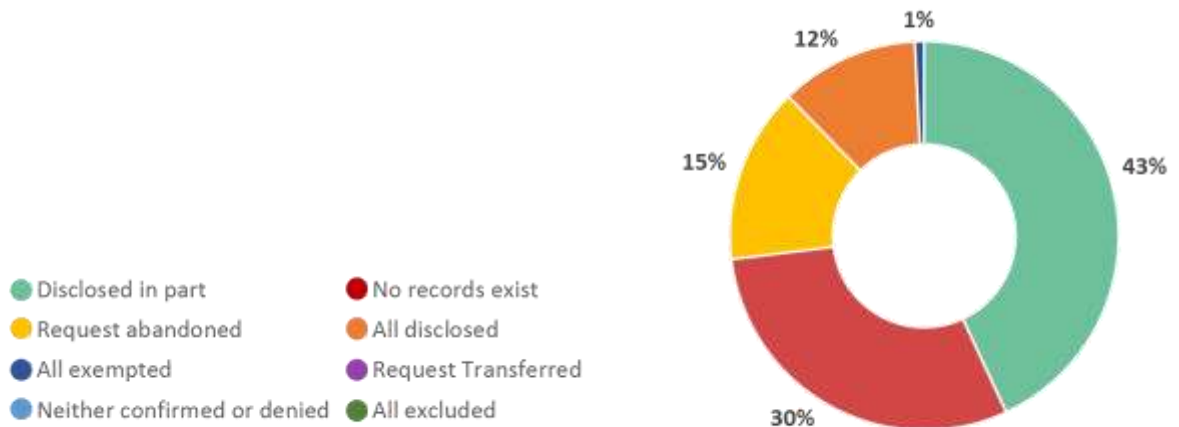


Figure 2 Disposition of Completed Requests

Exemptions Invoked

Sections 13 to 24 of the ATIA provides specific legislated exemptions intended to protect information from disclosure, while section 26 provide a temporary exemption relating to information that will soon be published. In some instances, records may have multiple exemptions applied to them to appropriately safeguard information.

Within the 57 files partially or completely withheld, the large majority (50 requests) of exemptions applied were for section 19(1); this is a mandatory exemption that safeguards personal information. 42 requests had section 21 applied for the protection of information related to government operations. The application of section 20 to protect third party information in 24 requests required consultations to ensure that only proprietary and commercially sensitive information is protected.

Exclusions Cited

The *Access to Information Act* does not apply to published material, material available to the public for purchase, or for public reference (section 68), nor does it apply to confidences of the Queen's Privy Council (section 69). Requests containing proposed exclusions under section 69 require consultation with the Department of Justice, and, in some cases, the Privy Council Office.

In 2019-2020, 5 requests contained exclusions for publicly available material and 6 requests had records pursuant to confidences of the Queen's Privy Council.

Translations

No translations were required to respond to requests in 2019-2020.

Format of Information Released

Of the requests that were fully or partially disclosed, 5 were released in paper format, while the remaining 66 were released as electronic copies. Electronic copies are available through CD or epost™. epost™ is a service offered by Canada Post that provides an accessible platform to share information.

epost™ was introduced in fiscal year 2018–2019 to provide requesters with easier and more timely access to information.

Privacy Act

Caseload/Carry Forward

In 2019-2020, Public Health Agency of Canada received 19 new privacy requests, a decrease from the 29 received in 2018-2019. 23 privacy requests were closed and 5 were carried forward to the 2020-2021 fiscal year, aligned with the previous year carry forward of 2 requests. Much of the health data that PHAC collects is aggregate and therefore doesn't contain personal information related to individuals, which is part of why the number of privacy requests is low.

Privacy Requests Received and Completed

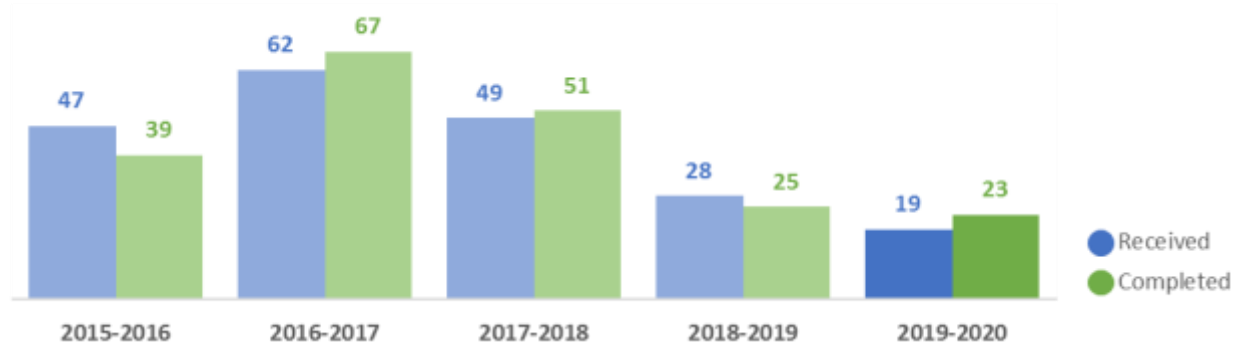


Figure 3 Privacy Requests Received and Completed each fiscal year from 2015-2016 to 2019-2020

Key Statistics by Fiscal Year

Fiscal Year	Number of Requests Received	Number of Requests Carried Over	Total Caseload	Number of Requests Closed	# of Pages Reviewed for Closed Files
2015–2016	47	1	48	39	360
2016–2017	62	9	71	67	1,782
2017–2018	49	4	53	51	245
2018–2019	28	2	30	25	838
2019–2020	19	5	24	23	148

Processing Time for Requests

Public Health Agency of Canada responded to 74% of privacy requests within legislated timelines (30 days plus applicable extension). The majority of those requests closed past the legislated timeline were due to interference with government operations (i.e. workload and voluminous records). In accordance with the TBS Directive on Personal Information Requests and Correction of Personal Information, Public Health Agency of Canada continues to notify requesters in writing of anticipated delays.

Extensions

No extensions were applied to any of the requests completed in 2019-2020.

Consultations Completed From Other Institutions

Public Health Agency of Canada received one consultation from another Government of Canada institution, which was completed during the fiscal year. Full disclosure of the record was recommended.

Exemptions Invoked

Of the 3 exemptions applied to privacy releases in 2019-2020, all were to protect the personal information of individuals other than the requester included in the records.

Exclusions Cited

No exclusions were applied to privacy request releases made in 2019-2020.

Translations

No translations were required to respond to requests in 2019-2020.

Format of Information Released

Of the 5 requests that were fully or partially disclosed, 3 were released in paper format, while the remaining 2 were released as electronic copies. Electronic copies are available through CD or epost™. epost™ is a service offered by Canada Post that provides an accessible platform to share information. Use of epost™ was introduced in fiscal year 2018–2019 to provide requesters with easier and more timely access to information.

Performance During COVID-19

In mid-March 2020, ATIP Operations and Privacy Management Division staff were subject to COVID-19 restrictions, including the immediate closure of government offices. Staff were quickly transitioned to work remotely as part of the federal government's plan to address the COVID-19 pandemic.

Request Processing

Following TBS' Guidance, requesters were notified of reduced capacity and the expectation of delays due to the exceptional measures. Public Health Agency of Canada continued to make best efforts to respond to requests in accordance with operational realities.

Through the end of March 2020, Public Health Agency of Canada's ATIP Operations continued to operate at very limited capacity, processing records that were already retrieved and available electronically through modified means. Staff were advised that only those employees providing critical services were to access the Public Health Agency of Canada network during core business hours and the ATIP software was not to be used at all due to its very large usage of bandwidth. On March 27th, 2020, ATIP Operations staff were advised that they could begin using the ATIP software on the network, but only between the hours of 8 PM and 7 AM.

While many third parties and other governments were unable to accept consultation packages during this time, those packages continued to be prepared so that they were ready to send when external restrictions were lifted or capacity within these institutions increased.

During the time period from March 14 to March 31, 2020 ATIP Operations received 8 new ATI requests and 0 new privacy requests. 1 access to information requests was closed during this time. New requests continued to be sent to branches in order to ensure retention of relevant records and to begin the processing of new requests as much as possible. Public Health Agency of Canada's Statistical Report on Requests Affected by COVID-19 Measures can be found in [Appendix D](#).

Privacy Management Division Advisory Services

As the Privacy Management Division provides critical services to Public Health Agency of Canada, it remained fully operational, with a focus on providing advisory services for many initiatives aimed at responding to the COVID-19 pandemic. This included privacy advice on matters such contracts, digital solutions, the collection, use and disclosure of personal information, as well as research projects.

In order to meet the tight timelines and high demands, Privacy Management Division developed privacy assessments, tools and guidance documents specifically tailored to responding to these files. Privacy advisory services for COVID-19 related files has continued well into fiscal year 2020-2021 and is also expected to be reported in next year's Annual Report.

Public Health Agency of Canada is committed to appropriately handling the personal information in its custody and ensured thorough consideration was given to privacy requirements, especially given the speed with which COVID-19 initiatives were being developed.

Reporting on Fees for the *Service Fees Act*

The *Service Fees Act* requires a responsible authority to report annually to Parliament on the fees collected by the institution.

With respect to fees collected under the *Access to Information Act*, the information below is reported in accordance with the requirements of section 20 of the *Service Fees Act*.

Enabling authority: *Access to Information Act*

Fee amount: The only fee charged is \$5 to submit a request under the *Access to Information Act*.

Total Revenue: The total fee revenue for 2019-2020 was \$515.

Fees waived: In accordance with the Interim Directive on the Administration of the *Access to Information Act*, issued on May 5, 2016, and the changes to the *Access to Information Act* that came into force on June 21, 2019, Public Health Agency of Canada waives all fees prescribed by the Act and Regulations, other than the \$5 application fee set out in paragraph 7(1)(a) of the Regulations.

A total of \$170 was waived by Public Health Agency of Canada in 2019-2020.

Cost of operating the program: Public Health Agency of Canada spent a total of \$355,793 on ATI functions in 2019-2020. Of this total, salaries and overtime costs represent \$279,739 and administration costs were \$76,054. Most of the administration costs were used to retain temporary help to address the volume and complexity of requests.

Costs for Administering the *Privacy Act*

Public Health Agency of Canada spent a total of \$527,088 on privacy functions in 2019-2020.

For the processing of privacy requests, a total of \$62,948 was spent. Of this total, salaries and overtime costs represent \$49,493 and administration costs were \$13,456. Temporary resources to support the processing of privacy requests accounted for \$11,421 of these administration costs.

Privacy Management Division's costs totalled \$464,140 with salaries and overtime representing \$355,442 and administration costs making up \$108,698. This includes \$100,636 to hire temporary resources to support the program.

Training and Awareness

Formal Training

Access to Information Training

An online 'Introduction to ATIP' course is available to all staff via the Canada School of Public Service, and is recommended as a foundation for all departmental employees. In addition, in 2019-2020 Public Health Agency of Canada conducted in-person Access to Information and Privacy Request training for 69 employees. Training is available to groups by request and is tailored for each session to include examples that are relevant to the participants' day-to-day work. Four types of training are available:

- ATI 101 – fundamental principles of the ATIA and *Privacy Act*, Public Health Agency of Canada-specific processes, an overview of key exemptions, and a case study/exercises
- Abridged ATI 101 – a refresher course focussed on Public Health Agency of Canada-specific processes and policies, and updates on recent changes in the legislation
- ATI 102: How to Read a Request Text and Search for Relevant Records – Public Health Agency of Canada-specific procedures with a focus on practical advice for assessing and understanding requests, estimating volume and retrieving and assessing records
- ATI 104: Update on Bill C-58 – a review of Canada's commitment to openness and transparency, the recent changes to legislation through Bill C-58, including proactive publication requirements, and a review of the fundamentals of the ATIA and *Privacy Act*

Courses can also be tailored to the group seeking training, depending on their specific needs.

Privacy Training

During the reporting year, the Public Health Agency of Canada (PHAC) delivered several privacy awareness and training sessions to PHAC management and employees. This included targeted training sessions with the International Health Regulations Ambassadors, the Programs and Partnerships Division, and the Data Partnerships and Innovation Hub. Total number of participants for these sessions was 81.

During fiscal year 2018-2019, the Privacy Management Division, along with colleagues in the joint Health Canada/Public Health Agency of Canada Research Ethics Board (REB) and the PHAC Office of

the Chief Science Officer (OCSO), delivered a privacy, research ethics and scientific integrity workshop to the National Microbiology Lab in Winnipeg. The purpose of this workshop was to ensure that privacy remains a key consideration for the Lab and to devise a more streamlined process for analyzing privacy risks associated with its activities. During this reporting year, the Privacy Management Division, REB, and OCSO delivered a follow-up two-day session to report back on the outcome of these efforts and to reinforce the importance of the Privacy Management Division's role in assessing privacy risks related to research activities. Total number of participants for these sessions was 150.

In addition, the Privacy Management Division continues to increase awareness among employees of their responsibilities under the *Privacy Act* through participation in Agency Events. This included hosting a kiosk at the 2019 PHAC Data Week. Privacy Management Division reached approximately 50 PHAC employees at its kiosk.

Finally, an online learning tool, Privacy Basics and Privacy Impact Assessments, continued to be used in 2019-20, and approximately 28 PHAC employees completed this training. In addition, the Privacy Management Division regularly communicates to all employees on privacy-related matters via the HC/PHAC internal news bulletin with the aim of supporting a culture of strong privacy awareness within the department.

Right to Know Week

In 2019, Canada celebrated Right to Know Week from September 23-28. Public Health Agency of Canada marked this event by taking the opportunity to communicate to employees each day about the importance of access to information and the ways that employees help uphold the 'right to know'. Messages included information about Open Government and what Public Health Agency of Canada is doing to support it, ATIP training available to employees, and guidance for searching encrypted emails.

Policies, Guidelines, Procedures and Initiatives

ATIP Online Request System

In November 2019, Public Health Agency of Canada onboarded to the Government of Canada [Online Request System](#) for Access to Information requests and Privacy requests. Requesters can now submit requests electronically to Government of Canada institutions through one, centralized website, as well as pay the \$5.00 application fee electronically for Access to Information requests, and submit proof of identity for requests for their own information.

Bill C-58

On June 21, 2019 Bill C-58, *An Act to amend the Access to Information Act and the Privacy Act and to make consequential amendments to other Acts*, received Royal Assent and enacted the first changes to the ATIA in many years. This prompted an update to Public Health Agency of Canada's [Delegation Order](#) to align with the revised legislation.

One of the most significant changes was the requirement for Proactive Publication of records such as

briefing note titles, Ministerial and Deputy Minister Transition briefing materials, Minister and Deputy Minister Parliamentary appearances, Question Period Notes, and reports tabled before Parliament. At Public Health Agency of Canada, the implementation of the new proactive publication requirements is led by the Office of Strategic Policy and Planning, while the Office of the Chief Financial Officer continued to lead on publication of contracts and expenses, and Corporate Services Branch led on publication of reclassifications.

The Agency remains committed to supporting TBS's full review of the legislation in the upcoming year.

Privacy Act Modernization

Public Health Agency of Canada has been very engaged in *Privacy Act* Modernization efforts, led by the Department of Justice, helping ensure that an eventual revised, modern *Privacy Act* addresses the realities of the Agency. In particular, Public Health Agency of Canada was consulted as part of the Department of Justice's targeted stakeholder engagement that commenced in summer 2019, and provided feedback on five discussion papers that focused on technical and legal considerations for modernizing the *Privacy Act*.

ATIP Coordinators' Working Group

This year Public Health Agency of Canada's ATIP Coordinator continued to Chair the ATIP Coordinator's Working Group, which meets monthly to discuss common issues and share best practices, strategies and tools. Launched in October 2018, the Working Group is comprised of ATIP Coordinators representing 30 institutions. Notable discussions in 2019-2020 included the coming into force of Bill C-58, investigations by the Office of the Information Commissioner (OIC) and Office of the Privacy Commissioner (OPC), challenges with managing third party consultations and associated complaints, as well as partnering with the Association of Access to Information and Privacy Professionals to launch a pilot training program for federal access to information and privacy analysts.

Data Strategy

During fiscal year 2018-2019, The Clerk of the Privy Council called on all departments, agencies or portfolios to develop a data strategy appropriate to their business lines by September 2019. Public Health Agency of Canada ensured its Data Strategy addressed privacy requirements in each of its key pillars. This will remain a focal point as phases of the data strategy are implemented in the coming years.

Risk-Based Approach to Reviewing Research Initiatives

As a key deliverable of the privacy, research ethics and scientific integrity workshop with the National Microbiology Lab, the Privacy Management Division, in collaboration with the REB, developed a risk-based approach for determining whether a research initiative should undergo a full privacy protocol assessment based on its level of privacy risk. This approach enables the Agency to allocate more resources to assessing research initiatives that have higher risks to privacy, while ensuring it is still meeting its legislative and policy privacy requirements.

Telework

On April 1, 2019, ATIP Operations Division launched a Telework Pilot for employees, providing the option to work remotely up to two days per week. Aligned with the Health Canada/Public Health Agency of Canada Telework Guide, the Pilot put in place parameters for managers to consider when

approving telework agreements, in order to ensure consistency and equity across the Division. With almost 20 employees taking part in the Pilot, and management agreement that it was functioning well, the intention was to end the pilot and make telework part of normal operations as of April 1, 2020. In March 2020, when COVID-19 restrictions forced all employees to begin working remotely, the operationalization was no longer necessary, and employees and managers were well-placed to begin working remotely full time. While the switch to full-time remote work had challenges that the Telework Pilot could not have addressed, the foundation of being able to manage and collaborate virtually had already been laid.

Official Language Learning

Throughout 2019-2020 ATIP Operations Division and Privacy Management Division continued to offer part-time, on-site second language training to staff in order to support bilingual delivery of services. This learning model, which began in 2018, allowed staff to work in small groups with a certified language teacher, as well as using an online learning platform, to increase second language competency. ATIP is a field with a shortage of qualified resources across the Government of Canada, as well as a shortage of bilingual employees. Public Health Agency of Canada is committed to providing bilingual services to the public and is thus working to increase the bilingual capacity in this field.

Summary of Key Issues and Actions Taken on Complaints and Audits

Privacy Management Audit

An internal privacy audit was concluded during fiscal year 2019-2020 on the management of privacy practices at Health Canada and the Public Health Agency of Canada. The audit found that key privacy controls were generally in place and functioned as intended to effectively protect personal information. Specifically, it found that controls were sufficient in the following areas:

- The Public Health Agency of Canada has a defined Privacy Management Framework
- There is an appropriate process in place to respond to privacy breaches
- Privacy Impact Assessments (PIAs) and Privacy Protocols (PP) are prepared and approved by programs, and are reviewed by the Privacy Management Division

The audit found weaknesses in controls in the following areas:

- Without appropriate risk management, the Privacy Management Division was operating with limited organizational information and, as a result, its awareness efforts were mainly focused on the highest risk areas within its own branch, rather than being risk-based across the Public Health Agency of Canada
- While PIAs and PPs were prepared and approved to mitigate privacy risks, the recommendations made by the Privacy Management Division in the assessments were not being monitored by Privacy Management Division
- Although some Privacy Management Division staff had had training on Sex- and Gender-Based

Analysis + (SGBA+), the Privacy Management Division had not documented an analysis of consideration of SGBA+ in its processes

In fiscal year 2019-2020, Privacy Management Division began addressing the recommendations of the Management Action Response Plan in response areas where weaknesses were identified. Work on addressing these areas is expected to continue in fiscal year 2020-2021.

A copy of the full audit report can be found at: <https://www.canada.ca/en/public-health/corporate/transparency/corporate-management-reporting/internal-audits/reports/management-privacy-practices-2019.html>

Complaints Management

Complaints to the Information Commissioner

In 2019–2020, 15 complaints under the ATIA were filed with the Office of the Information Commissioner (OIC) for Public Health Agency of Canada's requests. The passage of Bill C-58 on June 21, 2019 bestowed order-making powers to the OIC for complaints submitted on or after that date. No orders were issued to Public Health Agency of Canada by the OIC in 2019-2020.

Areas of complaint includes deemed refusal (late), time extensions taken, and exemptions applied, in particular related to personal information and third party information. The Department reviews the outcomes of all OIC investigations, and where appropriate, incorporates lessons learned into business processes.

Complaints Submitted to the Privacy Commissioner

There were no (0) complaints received under Section 31 of the *Privacy Act* related to the handling of personal information by Public Health Agency of Canada. There were no (0) notices sent by the OPC to the Agency; these notices provide the opportunity to make formal representations relating to active investigations. There were no (0) Letters of Findings received under Section 35 from the OPC relating to complaints.

Federal Court Appeals

Applications/Appeals Submitted to the Federal Court/Federal Court of Appeal

Access to Information Act

When Public Health Agency of Canada decides to disclose information related to third parties under the *Access to Information Act*, the third party is officially informed and has the opportunity to challenge the disclosure through judicial review. This can happen before the initial publication of the documents (notice under section 28) or following a formal complaint by the OIC and a subsequent recommendation or order to reconsider the publication (notice under section 29).

In 2019–2020, Public Health Agency of Canada received 1 judicial review notification, which was discontinued in early 2020-2021. This case was brought forward by a third party under Section 44 of the *Access to Information Act*.

NewLink Genetics

In February 2020, NewLink Genetics filed for judicial review of Public Health Agency of Canada's decision to release records containing third party information, following a recommendation from the Information Commissioner. The case was discontinued on April 6, 2020.

Privacy Act

No applications or appeals were made to the Federal Court or the Federal Court of Appeal during the 2019–2020 fiscal year.

Monitoring Compliance

ATIP Operations Division produces weekly, monthly and quarterly reports to senior management in order to monitor performance within Public Health Agency of Canada. This includes incoming volume of requests, number of closed requests, and timeliness of retrieval of records.

Similarly, the Privacy Management Division produces quarterly reports on privacy breaches and privacy impact assessments. Privacy Management Division supports compliance by periodically reviewing its privacy policies, procedures and practices.

Other Reporting Requirements Specific to the *Privacy Act*

Material Privacy Breaches

Public Health Agency of Canada reported one (1) material privacy breach during the 2019-2020 fiscal year to the Office of the Privacy Commissioner and the Treasury Board Secretariat. The breach involved an email, containing contextually sensitive personal information that was accidentally sent by carbon copy to recipients instead of by blind carbon copy to prevent recipients from seeing the other email addresses that the message was sent to. Measures were taken to contain the breach including recommendations to incorporate a quality control measures as well as privacy awareness training.

Privacy Impact Assessments

There were no (0) PIAs completed during fiscal year 2019-2020.

Public Interest Disclosures

There were no (0) disclosures made under section 8(2)(m) of the Act and no (0) section 8(5) written notifications made to the Office of the Privacy Commissioner during fiscal year 2019-2020.

Appendix A: *Access to Information Act* and *Privacy Act* – Delegation Order

Delegation Order

Access to Information Act and Privacy Act

I, the Minister of Health, pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby delegate the persons holding the positions set out in the Delegation of Authority Schedule attached hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as head of Public Health Agency of Canada, under the provisions of the Act and related regulations set out in the schedule opposite each position. This delegation supersedes all previous delegation orders.

L'ordonnance de délégation de pouvoirs

Loi sur l'accès à l'information et Loi sur la protection des renseignements personnels

En ma qualité de ministre de la Santé et en vertu de l'article 95 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, je délègue par la présente aux titulaires des postes énoncés à l'annexe de délégation de pouvoirs ci-après, ou aux personnes occupant les dits postes à titre intérimaire, les attributions dont je suis investie, à titre de ministre de l'Agence de la santé publique du Canada, aux termes des dispositions des lois et des règlements connexes mentionnés en regard de chaque poste. Le présent document remplace toute ordonnance de délégation de pouvoirs antérieure.



Minister of Health
Ministre de la Santé

JAN 22 2020

Date

Delegation of Authority Schedule

Access to Information Act

Part 1 and 3

Provision	Description	President	Assistant Deputy Minister, Corporate Services Branch	Director General, PIMSD	Director, ATIP Ops	Deputy Director, ATIP Ops
	All powers, duties and functions under the <i>Access to Information Act</i> , R.S.C. 1985, c. A-1 (prior to and following June 21, 2019) and related regulations (prior to and following June 21, 2019)	Full authority				

Provision	Description	Director, PMD	Manager ATIP Ops	Team Leader ATIP Ops	Senior Analyst ATIP Ops	Analyst ATIP Ops
4(2.1)	Responsibility of government institutions	No	Yes	Yes	Yes	Yes
6.1(1)	Reasons for declining to act on request	No	Yes	No	No	No
6.1(1.3), (1.4),	Notice – suspension, end of suspension	No	Yes	Yes	Yes	No
7	Notice when access requested	No	Yes	Yes	Yes	Yes
8(1)	Transfer of request	No	Yes	Yes	No	No
9 (1)	Extension of time limits	No	Yes	Yes	No	No
9(2)	Notice of extension to Information Commissioner	No	Yes	Yes	Yes	Yes
10	Where access is refused	No	Yes	Yes	No	No
11(2)	Application Fee Waiver	No	Yes	Yes	No	No
12(2)(b)	Language of access	No	Yes	Yes	No	No
12(3)(b)	Access to record in alternative format	No	Yes	Yes	No	No
Exemption Provisions of the Access to Information Act						
13	Information obtained in confidence	No	Yes	No	No	No
14	Federal-provincial affairs	No	Yes	No	No	No
15	International affairs and defence	No	Yes	No	No	No
16	Law enforcement and investigations	No	Yes	Yes	No	No
16.5	<i>Public Servants Disclosure Protection Act</i>	No	Yes	No	No	No
17	Safety of individuals	No	Yes	No	No	No
18	Economic interests of Canada	No	Yes	No	No	No
18.1	Economic interest of certain government institutions	No	Yes	No	No	No
19	Personal information	No	Yes	Yes	No	No
20	Third party information	No	Yes	Yes	No	No
21	Advice, etc.	No	Yes	No	No	No
22	Testing procedures, tests and audits	No	Yes	No	No	No
22.1	Internal Audits	No	Yes	No	No	No
23	Protected information – solicitors, advocates and notaries	No	Yes	Yes	No	No
23.1	Protected information – patents and trade-marks	No	Yes	Yes	No	No
24	Statutory prohibitions against disclosure	No	Yes	Yes	No	No
Other Provisions of the Access to Information Act						
25	Severability	No	Yes	Yes	No	No
26	Refusal of access if information to be published	No	Yes	No	No	No
27(1), (4)	Notice to third parties	No	Yes	Yes	Yes	No
28(1)(b),	Representations of third party and decision	No	Yes	No	No	No
33	Notice to Information Commissioner of notices to third parties	No	Yes	Yes	Yes	No
35(2)(b)	Right to make representations	No	No	No	No	No
37(1)(c)	Notice of actions to implement recommendations of	No	Yes	No	No	No
37(4)	Access to be given to complainant	No	Yes	No	No	No
41(2)	Review by Federal Court – government institution	No	No	No	No	No
43(2)	Service or notice of application to Federal Court for review	No	Yes	Yes	No	No
44(2)	Notice to person who requested record	No	Yes	Yes	No	No
52(2)(b), 52(3)	Special rules for hearings	No	No	No	No	No
94	Annual report – government institutions	No	No	No	No	No
96(3)	Notice of Provision of services related to access to information	No	No	No	No	No
96(5)	Spending authority	No	No	No	No	No
Access to Information Act – Regulations						
6(1)	Transfer of request	No	Yes	No	No	No
8	Method of access	No	Yes	No	No	No
8.1	Limitations in respect of format support	No	Yes	No	No	No

Privacy Act

Provision	Description	President	Assistant Deputy Minister, Corporate Services Branch	Director General, PIMSD	Director, ATIP Ops	Deputy Director, ATIP Ops
	All powers, duties and functions under the Act and Regulations	Full authority				

Provision	Description	Director, PMD	Manager ATIP Ops	Team Leader ATIP Ops	Senior Analyst ATIP Ops	Analyst ATIP Ops
8(2)(j)	Disclosure for research or statistical purposes	Yes	No	No	No	No
8(2)(m)	Disclosure in the public interest or in the interest of the	Yes	No	No	No	No
8(4)	Copies of requests under paragraph 8(2)(e)	Yes	No	No	No	No
8(5)	Notice of disclosure under paragraph 8(2)(m)	Yes	No	No	No	No
9(1)	Record of disclosures to be retained	Yes	No	No	No	No
9(4)	Consistent uses	Yes	No	No	No	No
10	Personal information to be included in personal information	Yes	No	No	No	No
14(a)	Notice where access requested	No	Yes	Yes	Yes	No
14(b)	Giving access to the record	No	Yes	Yes	No	No
15	Extension of time limits	No	Yes	Yes	Yes	No
16	Where access is refused	No	Yes	Yes	No	No
17(2)(b)	Language of access	No	Yes	Yes	No	No
17(3)(b)	Access in an alternative format	No	Yes	Yes	No	No
Exemption Provisions of the Privacy Act						
18(2)	Exempt banks	No	Yes	No	No	No
19	Information obtained in confidence	No	Yes	No	No	No
20	Federal-provincial affairs	No	Yes	No	No	No
21	International affairs and defence	No	Yes	No	No	No
22	Law enforcement and investigations	No	Yes	No	No	No
22.3	<i>Public Servants Disclosure Protection Act</i>	No	Yes	No	No	No
23	Security clearances	No	Yes	No	No	No
24	Individuals sentenced for an offence	No	Yes	No	No	No
25	Safety of individuals	No	Yes	No	No	No
26	Information about another individual /	No	Yes	Yes	No	No
27	Protected information – solicitors, advocates and notaries	No	Yes	Yes	No	No
27.1	Protected information – patents and trade-marks	No	Yes	Yes	No	No
28	Medical records	No	Yes	No	No	No
Other Provisions						
33(2)	Right to make representations	Yes	No	No	No	No
35(1)(b)	Notice of actions to implement recommendations of	Yes	Yes	No	No	No
35(4)	Access to be given to complainant	Yes	Yes	No	No	No
36(3)(b)	Notice of actions to implement recommendations of	Yes	Yes	No	No	No
51(2)(b),(3)	Special rules for hearings	Yes	No	No	No	No
72	Annual report to Parliament	Yes	No	No	No	No
73.1(3)	Notice of Provision of services related to privacy	Yes	No	No	No	No
73.1(5)	Spending authority	Yes	No	No	No	No
Privacy Regulations						
7	Retention of personal information requested under paragraph	Yes	No	No	No	No
9	Examination of information	Yes	Yes	Yes	Yes	Yes
11(2),11(4)	Notification concerning corrections	Yes	Yes	Yes	Yes	Yes
13(1)	Disclosure of personal information relating to physical or mental	Yes	Yes	Yes	No	No
14	Examination in presence of medical practitioner or psychologist	Yes	Yes	Yes	No	No

Legend

Yes	Delegated
No	No Delegation

Appendix B: Statistical Report on the *Access to Information Act*

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

Section 1: Requests Under the *Access to Information Act*

1.1 Number of Requests

Category	Number of requests
Received during reporting period	138
Outstanding from previous reporting period	60
Total	198
Closed during reporting period	130
Carried over to next reporting period	68

1.2 Sources of Requests

Source	Number of requests
Media	51
Academia	5
Business (private sector)	16
Organization	8
Public	50
Decline to Identify	8
Total	138

1.3 Informal Requests

Completion Time	Number of Requests
1 to 15 days	23
16 to 30 days	0
31 to 60 days	1
61 to 120 days	4
121 to 180 days	2
181 to 365 days	0
More than 365 days	8
Total	38

Note: All requests previously recorded as “treated informally” will now be accounted for in this section only.

Section 2: Decline to act on vexatious, made in bad faith or abuse of right requests

Category	Number of Requests
Outstanding from previous reporting period	0
Sent during reporting period	0
Total	0
Approved by the Information Commissioner during reporting period	0
Declined by the Information Commissioner during reporting period	0
Carried over to next reporting period	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of requests	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	Total
All disclosed	1	8	3	2	0	1	0	15
Disclosed in part	3	7	6	14	7	7	12	56
All exempted	1	0	0	0	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	19	16	1	1	1	1	0	39
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	13	3	1	1	0	0	1	19
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Decline to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0
Total	37	34	11	18	8	9	13	130

3.2 Exemptions

Section	Number of requests
13(1)(a)	1
13(1)(b)	1
13(1)(c)	6
13(1)(d)	0
13(1)(e)	0
14	5
14(a)	2
14(b)	0
15(1)	1
15(1) - International Affairs	2
15(1) - Defence of Canada	0
15(1) - Subversive Activities	0
16(1)(a)(i)	0
16(1)(a)(ii)	0
16(1)(a)(iii)	0
16(1)(b)	0
16(1)(c)	0
16(1)(d)	0
16(2)	0
16(2)(a)	0
16(2)(b)	0
16(2)(c)	14
16(3)	0
16.1(1)(a)	0
16.1(1)(b)	0
16.1(1)(c)	0

Section	Number of requests
16.1(1)(d)	0
16.2(1)	0
16.3	0
16.31	0
16.4(1)(a)	0
16.4(1)(b)	0
16.5	0
15.6	0
17	0
18(a)	0
18(b)	1
18(c)	1
18(d)	1
18.1(1)(a)	0
18.1(1)(b)	0
18.1(1)(c)	0
18.1(1)(d)	0
19(1)	50
20(1)(a)	0
20(1)(b)	12
20(1)(b.1)	0
20(1)(c)	10
20(1)(d)	2
20.1	0
20.2	0
20.4	0
21(1)(a)	21
21(1)(b)	17
21(1)(c)	2
21(1)(d)	2
22	1
22.1(1)	0
23	8
23.1	0
24(1)	0
26	1

3.3 Exclusions

Section	Number of requests
68(a)	5
68(b)	0
68(c)	0
68.1	0
68.2(a)	0
68.2(b)	0
69(1)	3
69(1)(a)	0
69(1)(b)	0
69(1)(c)	0
69(1)(d)	0
69(1)(e)	0
69(1)(f)	0
69(1)(g) re (a)	3
69(1)(g) re (b)	0
69(1)(g) re (c)	0
69(1)(g) re (d)	0
69(1)(g) re (e)	0
69(1)(g) re (f)	0
69.1(1)	0

3.4 Format of Information Released

Paper	Electronic	Other
5	66	0

3.5 Complexity

3.5.1 Relevant Pages Processed and Disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
13,177	9,065	91

3.5.2 Relevant Pages Processed and Disclosed by Size of Requests

Disposition	Less than 100 pages processed		101 to 500 pages processed		501 to 1,000 pages processed		1,001 to 5,000 pages processed		More than 5,000 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	13	230	2	301	0	0	0	0	0	0
Disclosed in part	29	679	22	4,265	1	791	4	2,799	0	0
All exempted	1	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	19	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	62	909	24	4,566	1	791	4	2,799	0	0

3.5.3 Other Complexities

Disposition	Consultation Required	Assessment of fees	Legal Advice Sought	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	14	0	2	8	24
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	14	0	2	8	24

3.6 Closed Requests

3.6.1 Number of Requests Closed Within Legislated Timelines

Category	Requests Closed Within Legislated Timelines
Number of requests closed within legislated timelines	83
Percentage of requests closed within legislated timelines (%)	63.8

3.7 Deemed Refusals

3.7.1 Reasons for Not Meeting Legislated Timelines

Total Number of requests closed past the statutory deadline	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
47	17	9	3	18

3.7.2 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 timeline where an extension was taken	Total
1 to 15 days	5	1	6
16 to 30 days	0	4	4
31 to 60 days	4	3	7
61 to 120 days	3	4	7
121 to 180 days	1	6	7
181 to 365 days	1	3	4
More than 365 days	3	9	12
Total	17	30	47

3.8 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 4: Extension

4.1 Reasons for Extensions and Disposition of Requests

Disposition of Requests Where an Extension was Taken	9(1)(a) Interference with Operations	9(1)(b) Consultation: Section 69	9(1)(b) Consultation: Other	9(1)(c) Third Party Notice
All disclosed	0	0	4	0
Disclosed in part	12	0	25	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	1	0
Total	12	0	30	0

4.2 Length of Extensions

Length of Extensions	9(1)(a) Interference with Operations	9(1)(b) Consultation: Section 69	9(1)(b) Consultation: Other	9(1)(c) Third Party Notice
30 days or less	6	0	13	0
31 to 60 days	1	0	14	0
61 to 120 days	4	0	2	0
121 to 180 days	1	0	1	0
181 to 365 days	0	0	0	0
365 days or more	0	0	0	0
Total	12	0	30	0

Section 5: Fees

Fee type	Fee collected		Fee waived or refunded	
	Number of requests	Amount	Number of requests	Amount
Application	103	\$515	32	\$160
Other fees	0	\$0	2	\$10
Total	103	\$515	34	\$170

Section 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations Received from Other Government of Canada Institutions and Organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during reporting period	84	2,402	4	43
Outstanding from the previous reporting period	7	112	0	0
Total	91	2,514	4	43
Closed during the reporting period	86	2,308	4	43
Carried over to next reporting period	5	206	0	0

6.2 Recommendations and Completion Time for Consultations Received from Other Government of Canada Institutions

Recommendation	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	Total
Disclose entirely	29	32	8	2	0	0	0	71
Disclose in part	3	3	0	2	0	0	0	8
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	4	1	0	1	0	0	1	7
Total	36	36	8	5	0	0	1	86

6.3 Recommendations and Completion Time for Consultations Received from Other Organizations

Recommendation	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	Total
Disclose entirely	1	1	2	0	0	0	0	4
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	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	1	2	0	0	0	0	4

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of days	Fewer than 100 pages processed		101 to 500 pages processed		501 to 1,000 pages processed		1,001 to 5,000 pages processed		More than 5,000 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	1	0	0	0	0	0	0	0	0	0
16 to 30	3	40	0	0	0	0	0	0	0	0
31 to 60	2	1	0	0	0	0	0	0	0	0
61 to 120	1	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	7	41	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of days	Fewer than 100 pages processed		101 to 500 pages processed		501 to 1,000 pages processed		1,001 to 5,000 pages processed		More than 5,000 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	1	4	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	1	4	0	0	0	0	0	0	0	0

Section 8: Complaints and Investigations

Section 32 Notice of intention to investigate	Subsection 30(5) Ceased to investigate	Section 35 Formal representations	Section 37 Reports of finding received	Section 37 Reports of finding containing recommendations issued by the Information Commissioner	Section 37 Reports of finding containing orders issued by the Information Commissioner
15	0	5	7	1	0

Section 9: Court Action

9.1 Court Actions on Complaints Received Before June 21, 2019 and On-going

Section 41 (before June 21, 2019)	Section 42	Section 44
0	0	0

9.2 Court Actions on Complaints Received After June 21, 2019 (Section 41)

Complainant (1)	Institution (2)	Third Party (3)	Privacy Commissioner (4)	Total
0	0	1	0	1

Section 10: Resources Related to the Access to Information Act

10.1 Costs

Expenditures	Amount
Salaries	\$275,944
Overtime	\$3,796
Goods and Services	\$76,053
Professional services contracts	\$64,554
Other	\$11,499
Total	\$355,793

10.2 Human resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	3.61
Part-time and casual employees	0.12
Regional staff	0.00
Consultants and agency personnel	0.29
Students	0.02
Total	4.04

Appendix C: Statistical Report on the *Privacy Act*

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

Section 1: Requests Under the *Privacy Act*

1.1 Number of Requests

Category	Number of requests
Received during reporting period	19
Outstanding from previous reporting period	5
Total	24
Closed during reporting period	23
Carried over to next reporting period	1

Section 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of requests	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	Total
All disclosed	0	2	0	0	0	0	0	2
Disclosed in part	0	0	1	1	0	0	1	3
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	6	1	0	0	0	0	0	7
Request abandoned	8	0	0	0	0	1	2	11
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	14	3	1	1	0	1	3	23

2.2 Exemptions

Section	Number of requests
18(2)	0
19(1)(a)	0
19(1)(b)	0
19(1)(c)	0
19(1)(d)	0
19(1)(e)	0
19(1)(f)	0
20	0
21	0
22(1)(a)(i)	0
22(1)(a)(ii)	0
22(1)(a)(iii)	0
22(1)(b)	0
22(1)(c)	0
22(2)	0

Section	Number of requests
22.1	0
22.2	0
22.3	0
22.4	0
23(a)	0
23(b)	0
24(a)	0
24(b)	0
25	0
26	3
27	0
27.1	0
28	0

2.3 Exclusions

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

2.4 Format of Information Released

Paper	Electronic	Other
3	2	0

2.5 Complexity

2.5.1 Relevant Pages Processed and Disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
148	133	16

2.5.2 Relevant Pages Processed and Disclosed by Size of Requests

Disposition	Less than 100 pages processed		101 to 500 pages processed		501 to 1,000 pages processed		1,001 to 5,000 pages processed		More than 5,000 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	2	15	0	0	0	0	0	0	0	0
Disclosed in part	3	118	0	0	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	11	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	16	133	0	0	0	0	0	0	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	0	0	0	1	1
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	1	1

2.6 Closed Requests

2.6.1 Number of Requests Closed Within Legislated Timelines

Category	Requests Closed Within Legislated Timelines
Number of requests closed within legislated timelines	17
Percentage of requests closed within legislated timelines (%)	73.9

2.7 Deemed Refusals

2.7.1 Reasons for Not Meeting Legislated Timelines

Total Number of requests closed past the statutory deadline	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
6	2	0	0	4

2.7.2 Requests Closed Beyond Legislated Timelines (including any extension taken)

Number of days past deadline	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	1	0	1
16 to 30 days	0	0	0
31 to 60 days	1	0	1
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	2	0	2
More than 365 days	2	0	2
Total	6	0	6

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

Reason for Extension	Number of Requests Where an Extension was Taken
15(a)(i) Interference with Operations: Further Review Required to Determine Exemptions	0
15(a)(i) Interference with Operations: Large Volume of Pages	0
15(a)(i) Interference with Operations: Large Volume of Requests	0
15(a)(i) Interference with Operations: Documents are Difficult to Obtain	0
15(a)(iii) Consultation: Cabinet Confidence (Section 70)	0
15(a)(iii) Consultation: External	0
15(a)(iii) Consultation: Internal	0
15(b) Translation Purposes or Conversion	0
Total	0

5.2 Length of Extensions

Reason for Extension	1 to 15 days	16 to 30 days	31 days or greater	Total
15(a)(i) Interference with Operations: Further Review Required to Determine Exemptions	0	0	N/A	0
15(a)(i) Interference with Operations: Large Volume of Pages	0	0	N/A	0
15(a)(i) Interference with Operations: Large Volume of Requests	0	0	N/A	0
15(a)(i) Interference with Operations: Documents are Difficult to Obtain	0	0	N/A	0
15(a)(iii) Consultation: Cabinet Confidence (Section 70)	0	0	N/A	0
15(a)(iii) Consultation: External	0	0	N/A	0
15(a)(iii) Consultation: Internal	0	0	N/A	0
15(b) Translation Purposes or Conversion	0	0	0	0
Total	0	0	0	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 reporting period	1	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	1	0	0	0
Closed during the reporting period	1	0	0	0
Carried over to next reporting period	0	0	0	0

6.2 Recommendations and Completion Time for Consultations Received from Other Government of Canada Institutions

Recommendation	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	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

Recommendation	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	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

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of days	Fewer than 100 pages processed		101 to 500 pages processed		501 to 1,000 pages processed		1,001 to 5,000 pages processed		More than 5,000 pages processed	
	Number of requests	Pages disclosed	Number of requests	Pages disclosed	Number of requests	Pages disclosed	Number of requests	Pages disclosed	Number of requests	Pages disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of days	Fewer than 100 pages processed		101 to 500 pages processed		501 to 1,000 pages processed		1,001 to 5,000 pages processed		More than 5,000 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 Investigation Notices Received

Section 31	Section 33	Section 35	Court Action	Total
0	0	0	0	0

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

9.1 Privacy Impact Assessments

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

Active	Created	Terminated	Modified
14	0	0	6

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	1
Number of material privacy breaches reported to OPC	1

Section 11: Resources Related to the *Privacy Act*

11.1 Costs

Expenditures	Amount
Salaries	\$403,066
Overtime	\$1,869
Goods and Services	\$122,153
Professional services contracts	\$112,057
Other	\$10,096
Total	\$527,088

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	3.64
Part-time and casual employees	0.76
Regional staff	0.00
Consultants and agency personnel	0.51
Students	0.00
Total	4.91

Appendix D: 2019-2020 Supplemental Statistical Report – Requests Affected by COVID-19 Measures

In addition to completing the forms for the Statistical Reports on the ATIA and *Privacy Act* for 2019-2020, institutions are asked to complete this Supplemental Report to help identify the impact of COVID-19 measures on institutional performance for 2019-2020 and going forward. The data requirements are set out in the tables below.

Supplemental Statistical Report on the *Access to Information Act*

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.

Table 1 – Requests Received

Timeperiod	Numer of Requests
Received from 2019-04-01 to 2020-03-13	130
Received from 2020-03-14 to 2020-03-31	8
Total	138

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.

Table 2 – Requests Closed

Timeperiod	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 periods	82	47
Received from 2020-03-14 to 2020-03-31	1	0
Total	83	47

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.

Table 3 – Requests Carried Over

Timeperiod	Number of Requests
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	61
Requests received from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	7
Total	68

Supplemental Statistical Report on the *Privacy Act*

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.

Table 4 – Requests Received

Timeperiod	Number of requests
Received from 2019-04-01 to 2020-03-13	19
Received from 2020-03-14 to 2020-03-31	0
Total	19

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.

Table 5 – Requests Closed

Timeperiod	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 periods	17	6
Received from 2020-03-14 to 2020-03-31	0	0
Total	17	6

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.

Table 6 – Requests Carried Over

Timeperiod	Number of requests
Requests from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	1
Requests from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	0
Total	1