



Office of the
Privacy Commissioner
of Canada

2016-2017 Annual Report to Parliament on the *Privacy Act*

September 2017

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Introduction

The *Privacy Act* (PA) came into effect on July 1, 1983. The Act imposes obligations on federal government departments and agencies to respect the privacy rights of individuals by limiting the collection, use and disclosure of personal information. The Act also gives individuals the right of access to their personal information and the right to request the correction of that information.

When the *Federal Accountability Act* received Royal Assent on December 12, 2006, the Office of the Privacy Commissioner (OPC) was added to the Schedule of the *Privacy Act* along with other Agents of Parliament. Therefore, while not initially subject to the Act, the OPC became so on April 1, 2007.

Section 72 of the Act requires that the head of every federal government institution submit an annual report to Parliament on the administration of the Act within their institutions during the fiscal year.

The OPC is pleased to submit its tenth Annual Report which describes how we fulfilled our responsibilities under the *Privacy Act* in 2016–2017.

Mandate and Mission of the OPC

The mandate of the OPC is to oversee compliance with both the *Privacy Act* (PA), which covers the personal information handling practices of federal government departments and agencies, and the *Personal Information Protection and Electronic Documents Act* (PIPEDA), Canada's federal private-sector privacy law.

The OPC's mission is to protect and promote the privacy rights of individuals.

The Commissioner works independently from any other part of the government to investigate privacy complaints from individuals with respect to the federal public sector and certain aspects of the private sector. In public sector matters, individuals may complain to the Commissioner about any matter specified in section 29 of the PA.

For matters relating to personal information in the private sector, the Commissioner may investigate complaints under section 11 of PIPEDA except in the provinces that have adopted substantially similar privacy legislation, namely Quebec, British Columbia, and Alberta. Ontario, New Brunswick and Newfoundland and Labrador now fall into this category with respect to personal health information held by health information custodians under their respective health sector privacy laws. However, even in those provinces with substantially similar legislation, and elsewhere in Canada, PIPEDA continues to apply to personal information collected, used or disclosed by all federal works, undertakings and businesses, including personal information about their employees. PIPEDA also applies to all personal data that flows across provincial or national borders, in the course of commercial activities.

The Commissioner focuses on resolving complaints through negotiation and persuasion, using mediation and conciliation if appropriate. However, if voluntary cooperation is not forthcoming, the Commissioner has the power to summon witnesses, administer oaths and compel the production of evidence. In cases that remain unresolved, particularly under PIPEDA, the complainant or the Commissioner may take the matter to Federal Court and seek a court order to rectify the situation.

As a public advocate for the privacy rights of Canadians, the Commissioner carries out the following activities:

- Investigating complaints and issuing reports with recommendations to federal government institutions and private-sector organizations to remedy situations, as appropriate;
- Pursuing legal action before federal courts where appropriate to resolve outstanding matters;
- Assessing compliance with obligations contained in the PA and PIPEDA through the conduct of independent audit and review activities;
- Advising on, and reviewing, Privacy Impact Assessments (PIAs) of new and existing government initiatives;
- Providing legal and policy analyses and expertise to help guide Parliament's review of evolving legislation to ensure respect for individuals' right to privacy;
- Responding to inquiries from parliamentarians, individual Canadians and organizations seeking information and guidance, and taking proactive steps to inform them of emerging privacy issues;
- Promoting privacy awareness and compliance, and fostering understanding of privacy rights and obligations through proactive engagement with federal government institutions, private-sector organizations, industry associations, legal community, academia, professional associations, and other stakeholders;
- Preparing and disseminating public education materials, positions on evolving legislation, regulations and policies, guidance documents and fact sheets for use by the general public, federal government institutions and private sector organizations;
- Conducting research and monitoring trends in technological advances and privacy practices, identifying systemic privacy issues that need to be addressed by federal government institutions and private sector organizations and promoting integration of best practices; and
- Working with privacy stakeholders from other jurisdictions in Canada and on the international scene to address global privacy issues that result from ever increasing transborder data flows.

Organizational Structure

The Privacy Commissioner is an Officer of Parliament who reports directly to the House of Commons and the Senate. The Commissioner may be assisted by an Assistant Commissioner, who has delegated responsibilities under both the PA and PIPEDA. At the time of writing this report, the position has been vacant since December 2013.

The OPC is structured in the following way:

Executive Secretariat

The Executive Secretariat ensures effective liaison and coordination with internal and external stakeholders and provides strategic advice so that the Commissioner and Assistant Commissioner are able to carry out their mandate to protect and promote privacy rights of individuals.

Privacy Act Investigations Branch

The PA Investigations Branch receives and investigates complaints from individuals who claim a breach of the PA, or complaints that are initiated by the Commissioner. The Branch also receives notifications of breaches from federal government organizations, and receives and reviews public interest disclosures made by them.

PIPEDA Investigations Branch

The PIPEDA Investigations Branch is divided between Ottawa and Toronto. In Ottawa, the Branch receives and investigates complaints of national scope by individuals or initiated by the Commissioner, from anywhere in Canada. In Toronto, the Branch investigates complaints particularly from the Greater Toronto Area (GTA) and coordinates public education and stakeholder outreach activities in the GTA.

Audit and Review Branch

The Audit and Review Branch audits organizations to assess their compliance with the requirements set out in the two federal privacy laws. The Branch also analyses and provides recommendations on Privacy Impact Assessments (PIAs) submitted to the OPC pursuant to the Treasury Board Secretariat (TBS) *Directive on Privacy Impact Assessment*.

Communications Branch

The Communications Branch focuses on providing strategic advice and support for communications and public education activities for the OPC. In addition, the Branch plans and implements a variety of public education and communications activities through media monitoring and analysis, public opinion polling, media relations, publications, special events, outreach activities and the OPC website. The Branch is also responsible for the OPC's Information Centre, which responds to requests for information from the public and organizations regarding privacy rights and responsibilities.

Legal Services, Policy, Research and Technology Analysis Branch

The Legal Services, Policy, Research and Technology Analysis Branch (LSPRTA) provides strategic legal and policy advice and conducts research on emerging privacy issues in Canada and internationally. More specifically, the Branch provides strategic legal advice to the Commissioners and various Branch Heads on the interpretation and application of the PA and PIPEDA in investigations and audits, as well as general legal counsel on a broad range of corporate and communication matters. LSPRTA represents the OPC in litigation matters before the courts and in negotiations with other parties both nationally and internationally. It reviews and analyzes legislative bills, government programs, public and private sector initiatives and provides strategic advice to the Commissioners on appropriate policy positions to protect and advance privacy rights in Canada. The Branch prepares for, represents and supports the Office in appearances before Parliament and in its relations with parliamentarians. Its analysts conduct applied research on the privacy implications of emerging societal and technological issues to support and inform the development of OPC policy guidance and best practices for relevant stakeholders. The Branch administers the OPC Research Contributions Program, which was launched in 2004, to advance knowledge and understanding of privacy issues and to promote enhanced

protection of personal information. LSPRTA also identifies and analyzes technological trends and developments in electronic platforms and digital media; conducts research to assess the impact of technology on the protection of personal information in the digital world and provides strategic analysis and guidance on complex, varied and sensitive technological issues involving breaches in the security of government and commercial systems that store personal information.

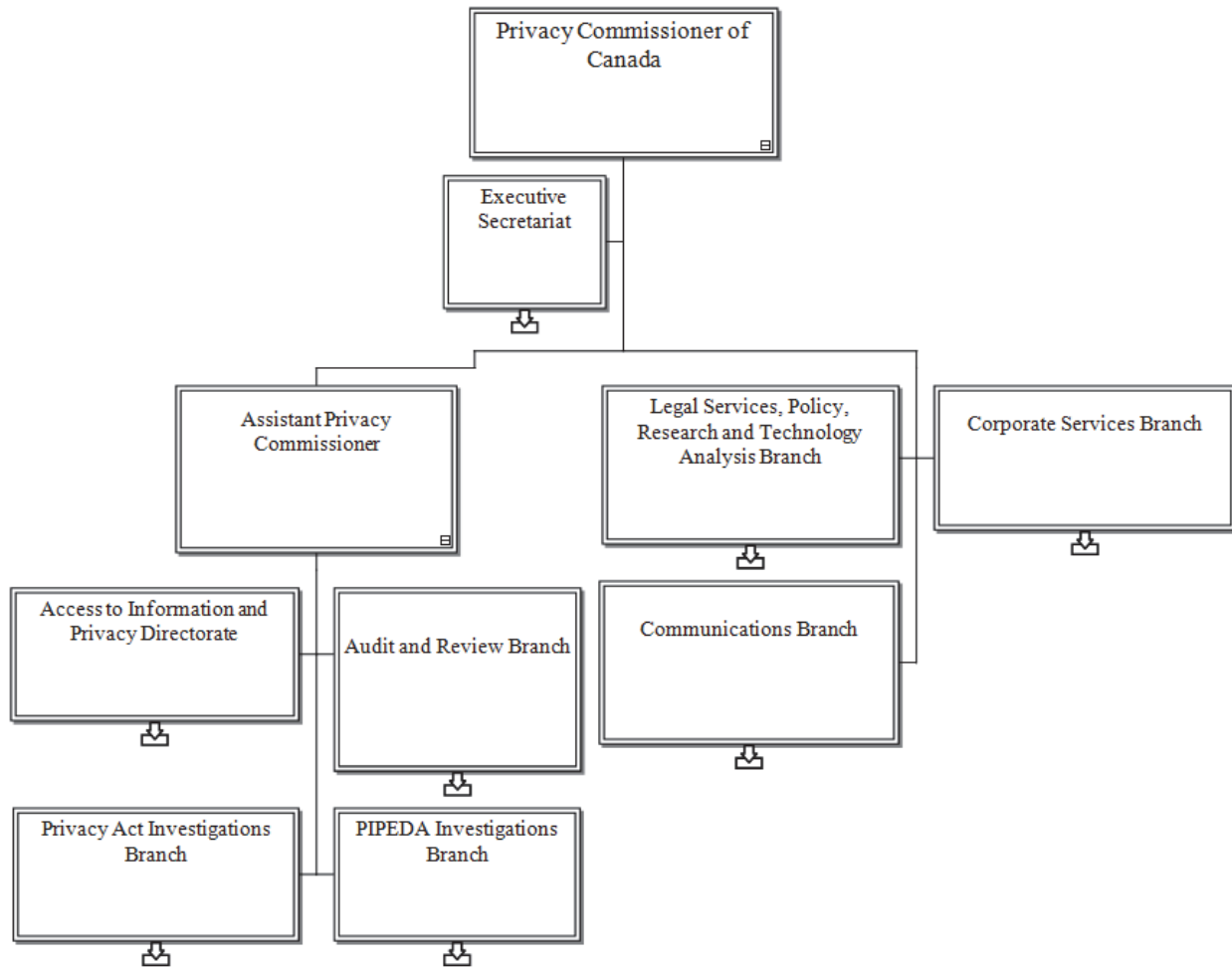
Corporate Services Branch

The Corporate Services Branch provides managers and staff with advice and integrated administrative services in corporate planning, resource management, financial management, information management, information technology, human resources management and general administration.

Access to Information and Privacy Directorate

The Access to Information and Privacy (ATIP) Directorate is responsible for responding to formal requests for information from the public pursuant to the Access to Information Act and the Privacy Act. The ATIP Directorate is also responsible for developing internal policies and ensuring compliance relative to these acts.

Office of the Privacy Commissioner of Canada



The ATIP Directorate is headed by a Director who is supported by two senior analysts.

Under section 73 of the PA, the Privacy Commissioner, as the head of the OPC, the Privacy Commissioner's authority has been delegated to the ATIP Director with respect to the application of the Act and its Regulations. With respect to public interest disclosures under section 8(2)(m) of the Act, the Commissioner's authority has been maintained. A copy of the Delegation Order is attached as Appendix A.

The ATIP Director also serves as the OPC's Chief Privacy Officer.

Privacy Commissioner, Ad Hoc / Complaint Mechanism

Given the silence of the *Federal Accountability Act* with respect to an independent mechanism under which PA complaints against the OPC would be investigated, the Office has developed an alternative mechanism to investigate OPC actions with respect to its administration of the Act.

For this purpose, the Commissioner's powers, duties and functions as set out in sections 29 through 35 and section 42 of the Act have been delegated to a Privacy Commissioner, Ad Hoc in order to investigate PA complaints lodged against the OPC.

The current Privacy Commissioner, Ad Hoc is Mr. David Loukidelis, Q.C. Mr. Loukidelis was British Columbia's Information and Privacy Commissioner from 1999 to 2010 and was British Columbia's Deputy Attorney General and Deputy Minister of Justice from 2010 to 2012. He was also Registrar of Lobbyists for British Columbia from 2003 to 2010. His experience in privacy and freedom of information dates back more than 20 years.

ATIP Directorate Activities

Training employees

In the reporting fiscal year, seven ATIP training sessions were offered to 32 OPC employees, including new employees and those returning from extended leave or temporary assignments elsewhere. The ATIP Directorate also provides trainings sessions as needed.

Contributing to decision making

The ATIP Director plays a collaborative role in the planning, development and updating of OPC policies, procedures and directives. The ATIP Director also sits on the OPC's key strategic decision-making committees. The OPC's recognition of the importance to integrate the ATIP Director in its core decision-making committees has ensured that the *Privacy Act* is respected.

In addition, the ATIP Director serves as chair of the Privacy Accountability Working Group. This group comprises representatives from every OPC branch. Its purpose and key activities are to:

- Promote a culture of privacy protection and awareness across the organization;
- Ensure accountability for the handling of personal information across the OPC and that the Office's internally-led initiatives are held to the same privacy-protective standards it expects of the organizations and institutions that it regulates;
- Review recommendations that the OPC makes externally for internal applicability and compliance; and
- Ensure that all initiatives involving collection, use and disclosure of personal information within the OPC are brought to the attention of the organization's Chief Privacy Officer.

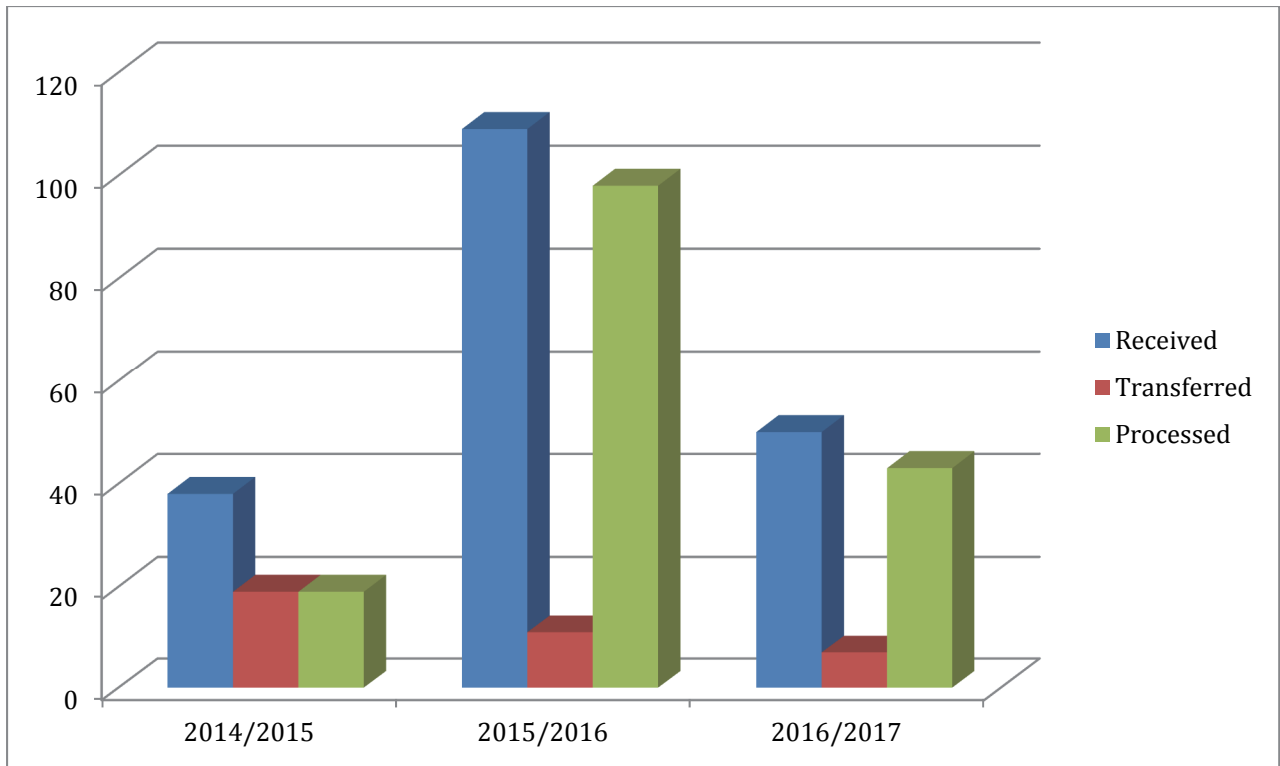
ATIP Directorate – Staff changes

In the reporting fiscal year, there were a number of staff changes within the ATIP Directorate, including the hiring of a full time senior ATIP analyst, a casual employee and an employee on assignment to assist with the processing of access requests. It is anticipated that in the next reporting year, additional staff changes will take place, including the hiring of a full time employee.

Privacy Act Statistical Interpretation

The OPC received 50 formal requests under the PA for the fiscal year and closed 47, which included three that were carried over to the next reporting year. However, in almost half of the requests closed—27 (57%) of them—no records were found (10 requests) or were abandoned (10 requests) or were transferred (seven requests). With the consent of the requestors, six of the seven requests were re-directed for processing to the relevant institutions, namely, the Canada Border Services Agency, the Correctional Service of Canada and the Royal Canadian Mounted Police. The last one was re-directed internally.

Requests under the *Privacy Act*



During the reporting period, the OPC processed 43 PA requests for personal information under its control. This accounted for 12,229 pages of information processed. While this represents significantly fewer requests than the previous reporting year, this decrease is explained by the fact that 62 of the 89 requests received in the previous fiscal year, or almost 70% of them, were from the same requestor.

Three of the requests received were carried over to the next reporting year. The OPC also closed one request that had been carried forward from 2015–2016. In sum, the OPC processed 38 requests for personal information under its control in 2016–2017. In all cases, the requests were submitted by the individuals to whom the personal information was attributed.

In three cases, the OPC was required to claim extensions of time limits. In the three cases, the volume of records that required processing was quite large, and finalizing those requests within the original 30-day

timeframe would have unreasonably interfered with the operations of the OPC. With respect to the 43 requests processed in 2016–2017:

- In six instances, the information was disclosed entirely;
- Information was partially disclosed in 10 instances;
- In 17 instances, no records existed that responded to the requests;
- Information was exempted entirely in three instances;
- In 11 instances, the requests were abandoned by the requester.

Of the 43 requests processed in the reporting year, 22 were for the contents of PA or PIPEDA investigation files. Section 22.1 of the PA prohibits the OPC from releasing information it obtained during the course of its investigations or audits even after the matter and all related proceedings have been concluded. However, the OPC cannot refuse to disclose information it created during the course of an investigation or audit, once they and any related proceedings are completed — and subject to any applicable exemptions. This exemption was applied in 11 cases during the reporting period. With respect to other exemptions, section 26 was claimed in eight cases and section 27 in one case.

It is quite common for the OPC to receive broad requests seeking access to all the personal information held by the Government of Canada. In most cases, the OPC does not have any of the requested personal information under its control. In such cases, requesters are advised to consult [Info Source : Sources of Federal Government and Employee Information](#) for a detailed listing of the personal information holdings of each federal organization and to submit requests to those most likely to have the personal information to which they seek access.

At no point during the reporting period were requests received for correction of personal information held within the OPC.

Finally, the OPC received and responded to two consultations from other institutions: the Royal Canadian Mounted Police and the Treasury Board Secretariat.

Privacy Act complaints and court action against the OPC

During the reporting year, the OPC was the respondent in five complaints under the PA; with the exception of one complaint that had been carried over from the previous year, all were new complaints. The Privacy Commissioner, Ad Hoc issued five findings during this fiscal year. Two complaints were deemed not well-founded (including the complaint that had been carried over from the previous year), one was well-founded and two others well-founded resolved.

Report on the TBS Directive on Privacy Impact Assessment (PIA)

The *Directive on Privacy Impact Assessment*, which came into effect on April 1, 2010, requires that TBS monitor compliance with the Directive. Given this responsibility, institutions are asked to include pertinent statistics in their annual reports on the administration of the PA.

No PIAs were finalized in this reporting year.

Data Sharing Activities

The OPC did not undertake any personal data sharing activities this reporting year.

Disclosures of Personal Information

The OPC disclosed no personal information under sections 8(2) (e), (m) or 8(2) (5) of the PA during this fiscal reporting year.

Material Privacy Breach

No material privacy breaches occurred within the OPC during this fiscal reporting year.

Privacy-Related Policy Instruments

In light of the staff changes within the ATIP Directorate, no privacy policy instrument work was completed during the fiscal reporting year.

The ATIP Director is a member of the OPC's Policy Development Committee. In that role, policies, directives and guidelines have been and continue to be reviewed to ensure that the PA is respected.

For additional information on the OPC's activities, please visit www.priv.gc.ca

Additional copies of this report may be obtained from:

Director, Access to Information and Privacy
Office of the Privacy Commissioner of Canada
30 Victoria Street, 1st Floor
Gatineau, Québec K1A 1H3

Appendix A – Privacy Act Delegation Order

Privacy Act Delegation Order

The Interim Privacy Commissioner of Canada, as the head of the government institution, hereby designates pursuant to section 73 of the *Privacy Act*, the person holding the position set out below, or the person occupying on an acting basis that position, to exercise the powers, duties or functions of the Privacy Commissioner as specified below and as more fully described in Annex A:

Position	Sections of <i>Privacy Act</i>
Director, ATIP	<u>Act</u> : 8(2)(j), 8(4) and (5), 9(1) and (4), 10, 14, 15, 17(2)(b) and (3)(b), 18 to 28, 31, 33(2), 35(1) and (4), 36(3), 37(3), 51(2)(b) and (3), 70, 72(1) <u>Regulations</u> : 9, 11(2) and (4), 13(1), 14

This delegation of authority supersedes any previous delegation of the powers, duties and functions set out herein.

Dated at the City of Ottawa, this 9 day of January, 2014


Chantal Berrier
Interim Privacy Commissioner of Canada

Officium 7777-25-1228

Privacy Act

- 8(2)(j) Disclose personal information for research purposes
- 8(2)(m) Disclose personal information in the public interest or in the interest of the individual
- 8(4) Retain copy of 8(2)(e) requests and disclosed records
- 8(5) Notify Privacy Commissioner of 8(2)(m) disclosures
- 9(1) Retain record of use
- 9(4) Notify Privacy Commissioner of consistent use and amend index
- 10 Include personal information in personal information banks
- 14 Respond to request for access within 30 days; give access or give notice
- 15 Extend time limit for responding to request for access
- 17(2)(b) Decide whether to translate requested information
- 17(3)(b) Decide whether to give access in an alternative format
- 18(2) May refuse to disclose information contained in an exempt bank
- 19(1) Shall refuse to disclose information obtained in confidence from another government
- 19(2) May disclose any information referred to in 19(1) if the other government consents to the disclosure or makes the information public
- 20 May refuse to disclose information injurious to the conduct of federal-provincial affairs
- 21 May refuse to disclose information injurious to international affairs or defence
- 22 Series of discretionary exemptions related to law enforcement and investigations; and policing services for provinces or municipalities.
- 22.1(1) In force April 1, 2007 - Privacy Commissioner shall refuse to disclose information obtained or created in the course of an investigation conducted by the Commissioner
- 22.1(2) In force April 1, 2007 - Privacy Commissioner shall not refuse under 22.1(1) to disclose any information created by the Commissioner in the course of an investigation conducted by the Commissioner once the investigation and related proceedings are concluded
- 23 May refuse to disclose information prepared by an investigative body for security clearances

- 24 May refuse to disclose information collected by the Correctional Service of Canada or the National Parole Board while individual was under sentence if conditions in section are met
- 25 May refuse to disclose information which could threaten the safety of individuals
- 26 May refuse to disclose information about another individual, and shall refuse to disclose such information where disclosure is prohibited under section 8
- 27 May refuse to disclose information subject to solicitor-client privilege
- 28 May refuse to disclose information relating to the individual's physical or mental health where disclosure is contrary to best interests of the individual
- 31 Receive notice of investigation by Privacy Commissioner
- 33(2) Right to make representations to the Privacy Commissioner during an investigation
- 35(1) Receive Privacy Commissioner's report of findings of the investigation and give notice of action taken
- 35(4) Give complainant access to information after 35(1)(b) notice
- 36(3) Receive Privacy Commissioner's report of findings of investigation of exempt bank
- 37(3) Receive report of Privacy Commissioner's findings after compliance investigation
- 51(2)(b) Request that section 51 hearing be held in the National Capital Region
- 51(3) Request and be given right to make representations in section 51 hearings
- 70 Refuse to provide information that is excluded from the Act as a cabinet confidence
- 72(1) Prepare annual report to Parliament

Privacy Regulations

- 9 Provide reasonable facilities to examine information
- 11(2) and (4) Procedures for correction or notation of information
- 13(1) Disclosure of information relating to physical or mental health to qualified practitioner or psychologist
- 14 Require individual to examine information in presence of qualified practitioner or psychologist

Appendix B – Statistical Report

Statistical Report on the *Privacy Act*

Name of institution: Office of the Privacy Commissioner of Canada

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

PART 1 – Requests under the *Privacy Act*

	Number of Requests
Received during reporting period	50
Outstanding from previous reporting period	0
Total	50
Closed during reporting period	47
Carried over to next reporting period	3

PART 2 – Requests closed during the reporting period

2.1 Disposition and completion time

Disposition of requests	Completion Time							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	
All disclosed	5	1	0	0	0	0	0	6
Disclosed in part	2	5	2	1	0	0	0	10
All exempted	1	2	0	0	0	0	0	3
All excluded	0	0	0	0	0	0	0	0
No records exist	16	1	0	0	0	0	0	17
Request abandoned	10	1	0	0	0	0	0	11
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	34	10	2	1	0	0	0	47

2.2 Exemptions

Section	Number of requests	Section	Number of requests	Section	Number of requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	1	25	0
19(1)(e)	0	22(2)	0	26	8
19(1)(f)	0	22.1	11	27	1
20	0	22.2	0	28	0
21	0	22.3	0		

2.3 Exclusions

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

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	6	0	0
Disclosed in part	9	1	0
Total	15	1	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	244	149	6
Disclosed in part	9,531	1,587	10
All exempted	2,454	0	3

All excluded	0	0	0
Request abandoned	0	0	11
Neither confirmed nor denied	0	0	0
Total	12,229	1,736	30

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	6	149	0	0	0	0	0	0	0	0
Disclosed in part	8	778	1	127	1	682	0	0	1	0
All exempted	3	0	1	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
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	28	927	1	127	1	682	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	7	0	7
All exempted	1	0	1	0	2
All excluded	0	0	0	0	0
Abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	1	0	8	0	9

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of requests closed past the statutory deadline	Principal Reason			
	Workload	External consultation	Internal consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of days past deadline	Number of requests past deadline where no extension was taken	Number of requests past deadline where an extension was taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.7 Requests for translation

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

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Paragraph 8(5)	Total
0	0	0	0

PART 4 – Requests for correction of personal information and notations

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

PART 5 – Extensions**5.1 Reasons for extensions and disposition of requests**

Disposition of requests where an extension was taken	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation or conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	3	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	3	0	0	0

5.2 Length of extensions

Length of extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	3	0	0	0
Total	3	0	0	0

PART 6 – Consultations received from other institutions and organizations

6.1 Consultations received from other government institutions and organizations

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during the reporting period	2	34	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	2	34	0	0
Closed during the reporting period	2	34	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other government institutions

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	
Disclose entirely	1	0	0	0	0	0	0	1
Disclose in part	1	0	0	0	0	0	0	1
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	2	0	0	0	0	0	0	2

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	
Disclose entirely	0	0	0	0	0	0	0	0
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	0	0	0	0	0	0	0	0

PART 7 – Completion Time of Consultations with Cabinet Confidences

7.1 Requests with Legal Services

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

7.2 Requests with Privy Council Office

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

PART 8 – Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
4	5	5	0	14

PART 9 – Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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PART 10 – Resources related to the *Privacy Act***10.1 Costs**

Expenditures		Amount
Salaries		\$79,684
Overtime		\$0
Goods and Services		\$10,528
Professional services contracts	\$9,940	
Other	\$588	
Total		\$90,212

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.70
Part-time and casual employees	0.25
Regional staff	0.00
Consultants and agency personnel	0.05
Students	0.00
Total	1.00