



## **2018-2019 Annual Report on the *Privacy Act***

**For Non-Public Property and  
Staff of the Non-Public Funds, Canadian Forces**

**Canada** 

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## Part I – Introduction

The *Privacy Act* (Revised Statutes of Canada, 1985, Chapter P-21) was proclaimed on July 1, 1983. The Act was amended as a result of the royal assent of the *Federal Accountability Act* on December 12, 2006. Certain provisions came into force on December 12, 2006, and others took effect on April 1, 2007, and September 1, 2007.

The *Privacy Act* gives Canadian citizens, permanent residents and individuals present in Canada a right of access to information about themselves held by the government, subject to specific and limited exceptions. The Act also provides individuals the right to a reasonable expectation of privacy, including a basic right to exercise control over the collection, use and disclosure of their personal information.

Section 72 of the *Privacy Act* requires that the head of every federal government institution prepare for submission to Parliament an annual report on the administration of the Act within their institution during each fiscal year.

This annual report provides a summary of the management and administration of the *Privacy Act* within the Canadian Forces Morale and Welfare Services (CFMWS) for the fiscal year 2018-2019, for Non-Public Property (NPP) and the Staff of the Non-Public Funds (NPF), Canadian Forces.

### 1. Mandate of the Canadian Forces Morale and Welfare Services

#### 1.1 Background

The *National Defence Act* (Sections 2 and 38 – 41) vests Non-Public Property (NPP) with the Chief of the Defence Staff (CDS), Base / Wing Commanders and Unit Commanding Officers to be used for the benefit of serving and former Canadian Armed Forces (CAF) personnel and their families.

The CDS has delegated the Managing Director of NPP with the responsibility for the daily administration of NPP. Under the present administrative structure, the Managing Director of NPP responsibility is borne by the Chief Executive Officer of the Staff of the Non-Public Funds (NPF), Canadian Forces.

The Staff of the NPF, Canadian Forces is a Separate Agency within the public administration of the Government of Canada and included in Schedule V: Separate Agencies to the *Financial Administration Act*.

The collective NPP activities, including those of the Staff of the NPF, Canadian Forces and those delegated to NPP by the Department of National Defence (DND) through Alternative Service Delivery and other tasking mechanisms, are managed by the administrative construct known as the Canadian Forces Morale and Welfare Services (CFMWS).

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## 1.2. Responsibilities

CFMWS is responsible for administering NPP on behalf of the CDS and for delivering selected public morale and welfare programs, services, and activities to eligible members and their families on behalf of the Chief of Military Personnel. Our mission is to enhance the morale and welfare of the military community, thus contributing to the operational readiness and effectiveness of the Canadian Armed Forces (CAF).

With over 5,000 Staff of the NPF, Canadian Forces employees on bases, wings, units, and at headquarters in Ottawa, CFMWS operates with a fundamental principle in mind: the customer comes first. In partnership with bases, wings, and units, we ensure that our customers, the CAF Regular and Reserve Force members, retired and former CAF members, military families, DND employees, NPF employees, Royal Canadian Mounted Police (RCMP) and Canadian Coast Guard personnel receive the morale and welfare programs, services, and activities they deserve.

CFMWS operates through seven (7) divisions:

- Personnel Support Programs (PSP),
- Military Family Services (MFS),
- Commercial Services (includes CANEX and SISIP Financials),
- Corporate Services (includes CFOne Membership and Support Our Troops Fund),
- Finance,
- Information Services, and
- Human Resources.

## 2. Structure of the Access to Information and Privacy Program

Prior to 2017-2018, access to information and privacy (ATIP) activities related to NPP and the Staff of the NPF, Canadian Forces were managed by DND's ATIP Office. Following the Minister's approval of the NPP ATIP designation order in February 2017, and since the Staff of the NPF, Canadian Forces is a separate agency, CFMWS established its own ATIP Office, which began to operate in April 2017.

The National Manager Access to Information and Privacy (NM ATIP) administers the provisions of the *Privacy Act* within the CFMWS for NPP and the Staff of the NPF, Canadian Forces.

The NM ATIP reports to the Director Corporate Services who, in turn, reports to the Vice-President Corporate Services (VP CorpSvcs). The NM ATIP is responsible for managing all activities related to the CFMWS ATIP Program, in accordance with the NPP ATIP designation order and the provisions of the Act, Regulations, directives, policies and guidelines.

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The administration of the Act by the NM ATIP is also facilitated at the division levels of CFMWS. Each division has an ATIP point of contact who coordinates the collection of information and provides guidance to division employees on the application of the Act, as well as related CFMWS policies and procedures.

### **3. Designation order**

Under section 3 of the Act, the Minister is designated as the head of the government institution for purposes of the administration of the Act. Pursuant to section 73, the Minister may delegate any of his powers, duties or functions under the Act by signing an order authorizing one or more officers or employees of the institution, who are at the appropriate level, to exercise or perform the powers, duties or functions of the head, specified in the order.

Within CFMWS, the NPP ATIP designation order is based on a centralized process with the NM ATIP having full delegated authority under the Act. Full authority under the Act is also delegated to the Managing Director NPP / CEO, Staff of the NPF, Canadian Forces and the VP CorpSrvc who are responsible for the ATIP program.

The NPP ATIP designation order signed by the Minister of National Defence is attached at Annex A.

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## Part II – Key activities and accomplishments

### 1. Training and awareness

Given the complex nature of the *Privacy Act*, the NM ATIP provides guidance and advice to managers and employees at all levels of CFMWS on a regular basis.

During the 2018-2019 fiscal year, three (3) employees completed the free online course entitled *Access to Information and Privacy Fundamentals* (1015) that is available on GCcampus.

### 2. Policies and procedures

For the reference of all employees, corporate policies are available on the CFMWS website.

The *Policy on the Access to Information and Privacy (ATIP) Program* outlines the NPP ATIP designation order and sets out the definitions as well as the roles and responsibilities of all the stakeholders within NPP organizations. The objective of the Policy is to establish consistent practices and procedures for the processing of ATIP requests in order to ensure compliance and enhance the effective application of the *Access to Information Act* and the *Privacy Act* and their Regulations.

The *Policy on Privacy Practices* was developed to establish effective privacy management practices in order to ensure that personal information under the control of NPP entities is managed in a manner that is consistent with the *Privacy Act*, the *Privacy Regulations*, and related TBS policy instruments.

The *Privacy Breach Protocol* outlines the steps to be followed by management and staff in the event of any actual or suspected breach of privacy. The guidance provided in the protocol ensures that when a privacy breach occurs, it is quickly controlled and similar breaches are prevented from occurring.

There was no change made to the above policies in 2018-2019.

### 3. Monitoring compliance

CFMWS timeliness and compliance under the Act are closely monitored by the NM ATIP and issues are reported to the VP CorpSvcs as required.

In the 2018-2019 fiscal year, CFMWS strived to maintain a high performance and attained a 91.6 percent compliance rate for responding to privacy requests within the legislated timelines.

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#### **4. Material privacy breaches**

A privacy breach involves improper or unauthorized collection, use, disclosure, retention or disposal of personal information. A privacy breach may occur within an institution or off-site and may be the result of inadvertent errors or malicious actions by employees, third parties, partners in information-sharing agreements or intruders.

A breach is deemed "material" if the breach involves sensitive personal information and could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals.

CFMWS reported one material privacy breach to the Office of the Privacy Commissioner (OPC) and to TBS during the reporting period, which is summarised below.

The CANEX.ca ecommerce website was compromised between 14-21 November 2018 by a malicious "form jacking" attack that redirected customers' credit card and other personal information, such as login, contact and financial information, to an unknown third party located in Lithuania. Steps were taken to contain and isolate the incident, including but not limited to security verification and removal of the malicious script, deactivation of the compromised administrative account, and limiting access to approved administrative accounts.

It was determined that up to 319 clients who had logged on, entered contact information, and/or made purchases were potentially affected by this privacy breach. In addition, there was an unknown number of individuals who may have started a transaction, opened a check out window and entered a credit card number, but who had not completed their purchase. There was no way to identify these individuals.

All of the 319 potentially affected individuals were notified by email and by telephone (call/message). Also, CFMWS put a notice on the CANEX page of its website as well as a link to that notice on CANEX.ca website to inform customers of the malicious attack and advising them to change their password for CANEX.ca and on any of their online accounts in an effort to further protect themselves.

#### **5. Personal information banks**

In accordance with section 10 of the *Privacy Act*, all personal information under the control of the institution that is used for an administrative purpose, or that is retrievable by name or personal identifier has to be described in personal information banks (PIBs).

Also, as required by the TBS Directive on Privacy Practices and Directive on Privacy Impact Assessment (PIA), any new or substantially modified PIB has to be approved by TBS before implementing any new or substantially modified program or activity.



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In the 2018-2019 fiscal year, TBS registered all standard banks applicable to the NPP and the Staff of the NPF, CF as well as the following PIBs:

- CF Personnel Assistance Fund (CFPAF) – CFMWS PPE 802
- Financial Counselling – CFMWS PPE 803
- Financial Planning – CFMWS PPE 804
- Insurance SISIP – CFMWS PPE 808

CFMWS submitted the following new PIB to TBS for approval:

- Military Family Services Program / Veteran Family Program (MFSP / VFP), CFMWS PPE 825

CFMWS does not have any exempt banks regarding NPP and the Staff of the NPF, Canadian Forces.

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## Part III – Highlights of the statistical report

Government institutions complete statistical reporting forms on the administration of the Act, as prescribed by the Treasury Board of Canada Secretariat (TBS), since 1983. The 2018-2019 statistical report on the *Privacy Act* is attached at Annex B. This is the second report prepared by CFMWS on NPP ATIP activities.

### 1. Requests under the *Privacy Act*

The NM ATIP processes all requests received by CFMWS pursuant to the *Privacy Act*. Each request is first reviewed for clarity and then assigned to one or more divisions of CFMWS that become responsible for locating and retrieving the records containing the information sought.

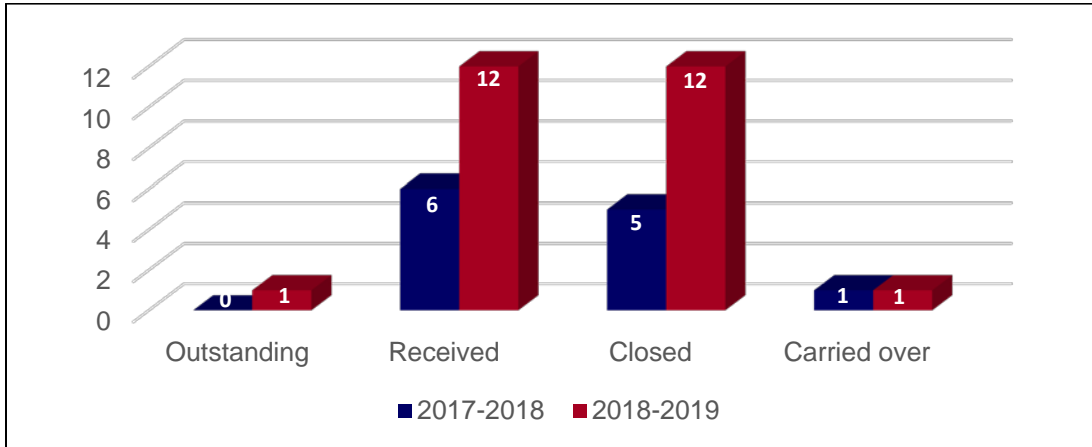
The CFMWS divisions review their relevant records and provide recommendations to the NM ATIP on any sensitivity related to their disclosure. Where necessary, the NM ATIP also undertakes consultations with other organizations before making a decision on disclosure. The NM ATIP then notifies the requester and provides access to all of the records that can be disclosed.

#### 1.1. Number of requests

In addition to the request outstanding from the previous fiscal year, CFMWS received 12 new privacy requests, for 13 requests in progress in 2018-2019. This represents a 100 percent increase compared with the previous reporting period. The majority of the requests received were for employment-related records.

Of the 13 requests in progress, 12 requests (92 percent) were completed in 2018-2019, representing a 140 percent increase compared with the previous reporting period. The remaining request (8 percent) was carried over to the next fiscal year. Chart I provides an overview of the volume of requests processed by CFMWS over the past two fiscal years.

**Chart I: Volume of Access to Information Requests**

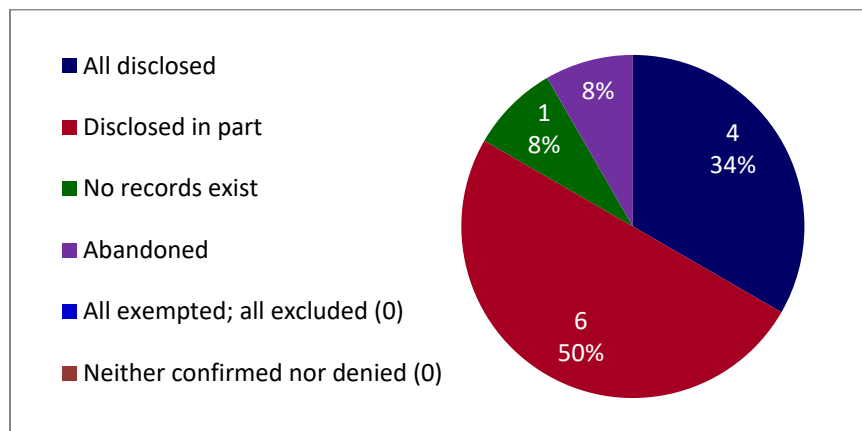


**2. Requests closed during the reporting period**

**2.1. Disposition and completion time**

Of the 12 completed, information was released in whole or in part for 10 requests (83 percent), there was no record found for one (1) request (8 percent) and the other one (8 percent) was abandoned by the requester. The average processing time for all requests completed was 34 days, which is 8 more days than the previous period. Chart II provides an overview of the disposition of the privacy requests closed by CFMWS during the fiscal year.

**Chart II: Disposition of privacy requests closed**



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## 2.2. Exemptions and exclusions

An individual's right of access to his/her personal information under the *Privacy Act* is limited by a number of exemptions specified in sections 18 through 28 of the legislation.

Pursuant to section 69 and 70, the Act does not apply to material that is published or available for purchase, library or museum material preserved solely for public record, material deposited with the Library and Archives Canada, as well as records considered to be confidences of the Queen's Privy Council of Canada.

Annex B shows the sections of the Act invoked to refuse access. For clarity purposes, if five different exemptions and/or exclusions were applied in one request, each relevant section is reported for a total of five. If the same exemption or exclusion was used several times in the same request, it is reported only once.

In 2018-2019, the majority of the records processed by CFMWS contained personal information about individuals other than the requester that was protected in accordance with section 26 of the Act. One request contained information subject to solicitor-client privilege pursuant to section 27 of the Act. There was no exclusion pursuant to sections 69 and 70 of the Act during the reporting period.

## 2.3. Format of information released

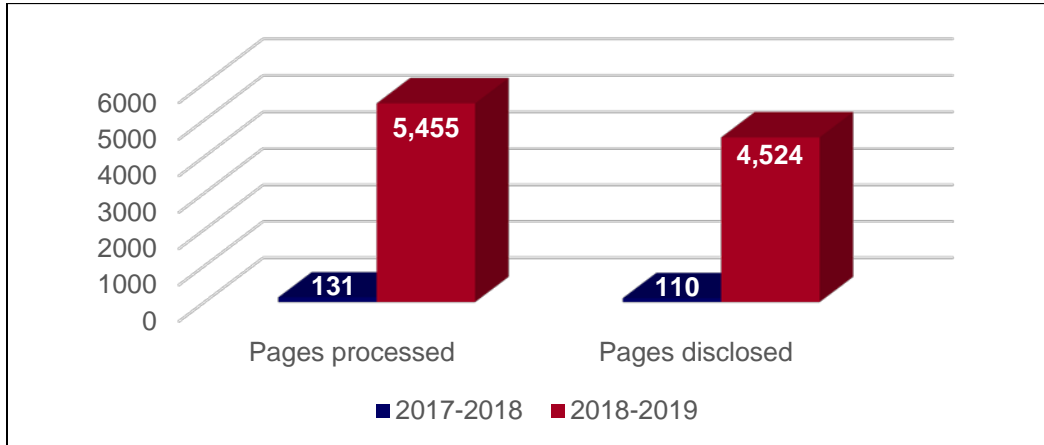
In order to provide quick and efficient client service and to minimize costs as well as the environmental footprint related to printing and the use of paper, CFMWS sends its correspondence by email as well as the records (secured by password), when possible. Otherwise, the information is put on CD or printed on paper and sent by regular mail.

Of the 10 requests in which information was released (*all disclosed* or *disclosed in part*), records were provided in the form of paper copies in five (5) requests (50 percent), whereas the five (5) other requests (50 percent) were in electronic format. There was no case where access was provided in other formats.

## 2.4. Complexity

CFMWS processed 5,455 pages and released 4,524 pages during the reporting period, which represents a substantial increase compared with the previous fiscal year. While on average the files contained 495 pages for review, one (1) case had over 800 pages and two (2) others had more than 1000 pages. Chart III provides the number of pages processed and disclosed by CFMWS over the past two (2) fiscal years.

**Chart IV: Number of pages processed and disclosed**



Aside from the volume of records, there was no consultation or other complexities.

## 2.5 Deemed refusals

One (1) request was closed two (2) days past the extended deadline due to the large volume of records to be reviewed.

## 2.6. Requests for translation

There was no request for the translation of information from one official language to another.

## 3. Disclosures pursuant to subsections 8(2) and 8(5) of the Act

During 2018-2019, CFMWS did not make any disclosures of personal information to investigative bodies in accordance with paragraph 8(2)(e) of the Act.

There was no disclosure made in the public interest under paragraph 8(2)(m) of the Act and therefore no need to notify the OPC pursuant to subsection 8(5) of the Act.

## 4. Requests for correction of personal information and notations

There was no request for the correction of personal information or for notations to be placed on a file.

## 5. Extensions

Of the 12 requests closed during the fiscal year, five requests (42 percent) needed to be extended in accordance with section 15(a)(i) of the Act due to the volume of records and meeting the original time limit would have unreasonably interfered with the operations of the institution.

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## 6. Consultations from other government institutions and organizations

CFMWS did not receive any consultations during the reporting period.

## 7. Consultations on Cabinet confidences

There was no consultation undertaken with Legal Services or the Privy Council Office on Cabinet confidences.

## 8. Complaints and investigations

Table I provides the breakdown of complaints made to the Office of the Privacy Commissioner of Canada and of requests for judicial review filed with the Federal Court of Canada, for which CFMWS was informed of over the past two fiscal years.

**Table I: Complaints and requests for judicial review**

Reporting period	Complaints	Judicial reviews
2017-2018	0	0
2018-2019	1	0

### 8.1. Complaints received from the Office of the Privacy Commissioner of Canada

In 2018-2019, the OPC notified CFMWS of one (1) complaint related to a privacy incident involving the inadvertent disclosure of personal information that had already been resolved internally. Given the actions taken by CFMWS in this regard, the OPC closed the file at the early resolution stage and no further action was required.

### 8.2. Requests for judicial review

There was no request made to the Federal Court of Canada seeking a judicial review.

## 9. Privacy impact assessments

In accordance with the TBS Directive on Privacy Impact Assessment (PIA), a PIA must be initiated for a program or activity in the following circumstances:

- when personal information is used for or is intended to be used as part of a decision-making process that directly affects the individual;
- upon substantial modifications to existing programs or activities where personal information is used or intended to be used for an administrative purpose; and
- when contracting out or transferring a program or activities to another level of government or the private sector results in substantial modifications to the program or activities.

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During the 2018-2019 fiscal year, the following PIA was completed and sent to the OPC and TBS:

- [Military Family Services Program / Veteran Family Program \(MFSP / VFP\)](#) — The VFP offers transition-focused core programming and extended MFSP to medically released Veterans and their families through Military Family Resource Centres (MFRCs) across Canada. In order to support consistent and reliable case management and data collection across the MFRCs and the MFSP Family Information Line (FIL), CFMWS implemented the Penelope Case Management Software, a business solution provided by Athena Software. As the system is centralized under CFMWS, a PIA has been undertaken to demonstrate due diligence and support informed decision-making during the development and future development of the project from a privacy perspective. The PIA summary is posted on the CFMWS website.

#### **10. Resources related to the *Privacy Act***

The total costs associated with the administration of the *Privacy Act* amounted to \$54,947 for the fiscal year 2018-2019. This was mainly covering half of the salary and employer costs of the NM ATIP, a full time employee of the Staff of the NPF, Canadian Forces, and the other half is included in the *Access to Information Act* report.

**Annex A**  
**Designation Order**

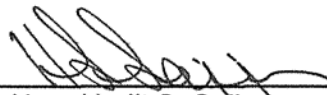


Pursuant to section 73 of the *Access to Information Act* and the *Privacy Act* (the "Acts"), The Minister of National Defence, as the head of a government institution under these Acts, hereby designates the persons holding the following positions or the persons occupying those positions on an acting basis, to exercise all of the powers and perform the duties and functions of the head of a government institution under these Acts concerning non-public property and related or assigned services, programs and operations\*:

- (a) The Managing Director NPP/CEO of the Staff of the Non-Public Funds, Canadian Forces;
- (b) The Chief of Staff and Vice President Corporate Services; and
- (c) The National Manager Access to Information and Privacy Program

\*For greater certainty, this includes all non-public property vested in the commanders of units and other elements and in the Chief of the Defence Staff established under section 38 to 41 of the National Defence Act; all activities of the Staff of the Non-Public Funds, Canadian Forces; and all non-public property services, programs and operations including those public Alternative Service Delivery functions assigned to be executed under the non-public property framework.

Approved

  
\_\_\_\_\_  
The Hon. Harjit S. Sajjan, PC, OMM, MSM, CD, MP  
Minister of National Defence

21 Feb 17  
\_\_\_\_\_  
Date

**Annex B**  
**Statistical report**  
**on the *Privacy Act***



## Statistical Report on the *Privacy Act*

Name of institution: Non-Public Property and Staff of the Non-Public Funds, Canadian Forces

Reporting period: 2018-04-01 to 2019-03-31

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

	Number of Requests
Received during reporting period	12
Outstanding from previous reporting period	1
<b>Total</b>	<b>13</b>
Closed during reporting period	12
Carried over to next reporting period	1

### 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	2	2	0	0	0	0	0	4
Disclosed in part	0	1	4	1	0	0	0	6
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	1	0	0	0	0	0	1
Request abandoned	1	0	0	0	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>4</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>12</b>

## 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)	0	25	0
19(1)(e)	0	22(2)	0	26	6
19(1)(f)	0	22.1	0	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)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

## 2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	3	1	0
Disclosed in part	2	4	0
<b>Total</b>	5	5	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	99	99	4
Disclosed in part	5,356	4,425	6
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	1
Neither confirmed nor denied	0	0	0
<b>Total</b>	5455	4524	11

## 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	4	99	0	0	0	0	0	0	0	0
Disclosed in part	1	42	2	262	1	826	2	3,295	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	1	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>6</b>	<b>141</b>	<b>2</b>	<b>262</b>	<b>1</b>	<b>826</b>	<b>2</b>	<b>3295</b>	<b>0</b>	<b>0</b>

## 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	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 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
1	1	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	1	1
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
<b>Total</b>	0	1	1

## 2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
<b>Total</b>	0	0	0

## Part 3: Disclosures Under Subsections 8(2) and 8(5)

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

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

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
<b>Total</b>	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	5	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
<b>Total</b>	5	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	1	0	0	0
16 to 30 days	4	0	0	0
<b>Total</b>	5	0	0	0

## Part 6: Consultations Received From Other Institutions and Organizations

### 6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

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

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	
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
<b>Total</b>	0	0	0	0	0	0	0	0

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

Recommendation	Number of days required to complete consultation 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	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
<b>Total</b>	0	0	0	0	0	0	0	0

## Part 7: Completion Time of Consultations on 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
<b>Total</b>	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
<b>Total</b>	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
1	0	0	0	0

## Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	1
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## Part 10: Resources Related to the *Privacy Act*

### 10.1 Costs

Expenditures	Amount
Salaries	\$54,947
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
<b>Total</b>	<b>\$54,947</b>

### 10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.50
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
<b>Total</b>	<b>0.50</b>

**Note:** Enter values to two decimal places.

## New Exemptions

<i>Privacy Act</i>	
<b>Section</b>	<b>Number of requests</b>
22.4 National Security and Intelligence Committee	0
27.1 Patent or Trademark privilege	0