

ANNUAL REPORT

Administration of the  
*Access to Information Act*  
and *the Privacy Act*

2020-2021



Veterans Affairs  
Canada

Anciens Combattants  
Canada



Canada

The Honourable Lawrence MacAulay  
Minister of Veterans Affairs and Associate Minister of National Defense

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## Introduction

The Government of Canada recognizes the public's right of access to information under the control of government institutions through the provisions of the *Access to Information Act*. At the same time, the Government also recognizes the public's right to the protection of their personal information under the control of government institutions through the provisions of the *Privacy Act*. Together these two pieces of legislation provide the framework for how government institutions collect, hold, use and retain information provided to them

At Veterans Affairs Canada (VAC), we value our clients' contributions to the development of Canada as a nation, and honour the sacrifices they have made in the defence of freedom and the pursuit of world peace. As an expression of Canada's gratitude to our Veterans, we strive to exemplify the high principles they have defended, and to be as open and transparent as possible, which shows that we are accountable and responsible for our actions and accept the consequences of our decisions.

We demonstrate our commitment to openness and transparency with our Veterans and their families, and Canadians, by:

- giving access to government information and personal information by responding to formal requests through the *Access to Information Act* and the *Privacy Act*;
- publishing information on our external departmental page;
- disclosing information on Open Government; and
- sharing information about our Department through the online catalogue of information (formerly known as "Info Source").

Veterans and their families entrust us with their personal information every time they apply for, and access our programs, services and benefits. Protecting their personal information is a priority and we are committed to the proper handling and use of this information.

## COVID-19 and Operational Changes in 2020-21

On March 15, 2020, the Office of the Chief Human Resources Officer issued guidance asking employees to work remotely in response to COVID-19. At that time, no VAC ATIP Operations staff were working from home. Since that time, VAC has equipped and enabled employees to work remotely so that we could continue to provide services to Veterans and their families in the midst of this global pandemic.

Ensuring the health, safety and well-being of Veterans and their families, and our employees, has been a priority during the COVID-19 pandemic.

During the COVID-19 pandemic, VAC ATIP Operations had to rapidly and unexpectedly transition from the office to working from home. In this transition, employees were challenged with unpredictable network and system connectivity, particularly at the beginning. Technological solutions were found to allow users to login into the ATIP processing software through application virtualization to increase performance and in certain circumstances to remote into their desktop in the office to assist with importing documents. These advancements allowed our office to continue to process requests. It also allowed us to continue our work of guiding and advising our employees on the proper use, handling and storage of information, which became ever more important given remote work.

We also continued to promote awareness and training on access to information and privacy among employees in our Department by meeting requests for training and publishing informational pieces for employees via the intranet on such items as right to know, the Access to Information Review and process maps for proactive publication.

Finally, we continued our work with colleagues at the Office of the Information Commissioner and the Office of the Privacy Commissioner to track and respond to complaints filed on requests we had processed under the Acts.

## Veterans Affairs Canada

### Who we are

Canada's development as an independent country with a unique identity stems partly from its achievements in times of war. VAC exists to assist and help those whose courageous efforts gave us this legacy and contributed to our growth as a nation.

The [Department of Veterans Affairs Act](#) provides authority to the Minister of Veterans Affairs to administer Acts of Parliament and orders in council, as are not by law assigned to any other federal department or any Minister, for the care, treatment and re-establishment in civil life of Veterans and the care of their dependents and survivors, and such other matters as the Governor in Council may assign.

Our mandate is to support the well-being of Veterans and their families, and to promote recognition and remembrance of the achievements and sacrifices of those who served Canada in times of war, military conflict and peace. To achieve this mandate, the Department focuses on its four main roles:

- Provide leadership as a champion of Veterans, and administer and coordinate needed benefits and services; whether through the Government of Canada or in partnership with provincial and community programs and non-governmental organizations.
- Help Veterans access the supports and services they need, from all levels of government and the community at large, and maintain a leadership role in the care and support of all Veterans and their families.
- Listen to the suggestions of Veterans, their representatives and stakeholders to guide work and research, and strive to design and deliver programs that meet the modern and changing needs of Veterans and their families.
- Engage Canadians of all ages in paying tribute to Veterans and those who died in service, ensuring that the legacy of their tremendous contributions to peace and freedom is preserved for generations to come.

Our Department fulfills its mandate and role through the delivery of programs such as disability benefits, financial benefits, rehabilitation, pension advocacy, education, and training supports. The Department also works to commemorate the achievements and sacrifices of Canadians during periods of war, military conflict and peace. We serve a highly diverse group, reflecting the remarkable breadth of Canada's contributions to world peace, including:

- Veterans - Armed Forces and Merchant Navy Veterans who served during the First World War, Second World War or Korean War; Former and current members of the Canadian Forces, including those who served in Special Duty Areas and in peacekeeping; and
- Allied Veterans who have served with one of the Allied forces during the Second World War or the Korean War; and have lived in Canada for at least 10 years or lived in Canada prior to enlisting.

- Others - Civilians who are entitled to benefits because of their war time services; former and, in certain cases, serving members of the Royal Canadian Mounted Police; and Survivors and dependents of the previous groups.

Our Department also assists members of the public who request information regarding departmental programs, services and activities.

## Our Organizational Structure

The Veterans Affairs Portfolio consists of:

- the Department of Veterans Affairs, which reports to the [Minister of Veterans Affairs](#);
- the [Veterans Review and Appeal Board](#), which reports to Parliament through the Minister of Veterans Affairs; and
- the [Office of the Veterans Ombudsman](#), a special advisor to the [Minister of Veterans Affairs](#);

The Department is made up of four branches and two divisions which report to the [Deputy Minister of Veterans Affairs Canada](#). These branches are: Service Delivery; Strategic Policy and Commemoration; Chief Financial Officer and Corporate Services; and Strategic Oversight and Communications. And the divisions are: Audit and Evaluation; and Bureau of Pensions Advocates.

## Our Report to Parliament

This year's annual report is a combined report on our administration of the *Access to Information Act* and the *Privacy Act*. We changed the format of our report because these Acts work together to build public trust and transparency in government. As such, we believe that combining these reports allows us to provide a more thorough and comprehensive narrative on how we did in our job of administering the overall framework for accessibility and protection of information. The report covers the period from April 1, 2020, to March 31, 2021, and provides a summary of our activities and performance.

This report has been prepared and tabled in Parliament in accordance with s.94 of the *Access to Information Act*, s.20 of the *Service Fees Act*, and s. 72 of the *Privacy Act*.

The report for the Office of the Veterans Ombudsman on their administration of the *Access to Information Act* and the *Privacy Act* is attached to this report as Annex A. A separate report is tabled by the Veterans Review and Appeal Board.

## Access to Information and Privacy at VAC

The ATIP Office is part of the Chief Financial Officer and Corporate Services Branch. This branch is responsible for supporting VAC in meeting Government of Canada requirements in areas such as financial stewardship, corporate reporting and key accountabilities. The ATIP Office at VAC administers the *Access to Information Act* and the *Privacy Act*.

## Purpose of the Acts

The purpose of the *Access to Information Act* is to foster accountability and transparency of government institutions by providing Canadian citizens, permanent residents, and all individuals and corporations present in Canada with a right of access to records under the control of government institutions. The Act

gives limited and specific exceptions, and more importantly, provides for an independent review of decisions made by government institutions on the disclosure of information under Part I of the Act. Part II of the Act is concerned with the proactive publication of government information and requires government institutions to proactively publish information of interest to the public. VAC is committed to publishing information and ensuring that it is understandable to all Canadians by following official languages and accessibility standards.

Privacy is a fundamental right in Canada. The *Privacy Act* operates to protect Canadians with respect to their personal information held by the Government of Canada. The Act provides Canadian citizens and permanent residents with the general right to access, and to seek correction of their personal information that is held by the federal government. The Act also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information. Personal information may only be used for the purposes allowed by the *Privacy Act*, and may only be disclosed in accordance with the legislation. This Act complements other departmental legislation and procedures for the collection, use and disclosure of personal information.

### The Work of the ATIP Office

Our ATIP Office is led by a Director, who acts as the ATIP Coordinator for the Department. The Office, located in Charlottetown, Prince Edward Island, consists of an ATIP Operations Unit and a Privacy and IM Policy and Governance Unit.

The ATIP Operations Unit is led by a Manager and is made up of four teams:

- Client Service team - responds to calls, provides database administration and the distribution of cases (4 FTE)
- Privacy team - processes both formal and informal requests for personal information under the *Privacy Act*; carries out consults with other government departments and third parties; and resolves complaints from oversight bodies (10 FTE)
- Access team - processes both formal and informal requests for government information under the *Access to Information Act*; carries out consults with other government departments and third parties; and resolves complaints from oversight bodies (6 FTE)
- Program Policy team – provide strategic functional advice, guidance and support to ATIP Operations, VAC management and VAC employees in all aspects of ATIP; reviews parliamentary written questions; and reviews and processes proactive disclosures requirements (2 FTE)

The Privacy and IM Policy and Governance Unit provides training, guidance, and recommendations to ensure privacy compliance. This unit coordinates privacy impact assessments, privacy breach investigations, and Office of the Privacy Commissioner complaints. This group is also responsible for IM policy and awareness, which oversees sound information management practices, including acting as the central contact for Open Government (7 FTEs).

### Delegation Orders

Responsibilities for administering the *Access to Information Act* and the *Privacy Act* are delegated by the Minister of Veterans Affairs to VAC officials through a delegation order. Treasury Board Secretariat (TBS) has recommended that government institutions draft orders that are relevant to the size, the mandate and the culture of their institution. As such, VAC's delegation orders reflect our organizational structure and the nature of our work. Authorities have been given to a number of leadership positions in our

Department, including the Deputy Minister, the Assistant Deputy Minister of Corporate Services, the Director General of Information Technology, Information Management and Administration, and the Director of Privacy and Information Management (who also serves as the department's ATIP Coordinator). Our orders also ensure that appropriate administrative authorities have been delegated to the ATIP officials responsible for effectively and efficiently administering the Acts.

The most recent delegation orders for the *Access to Information Act* and the *Privacy Act*, which reflect legislative amendments resulting from Bill C-58, were signed by the Minister of Veterans Affairs in March 2021. They are included in this report to Parliament (attached as Annex B and C).

## Performance 2020-21

During the reporting period of April 1, 2020 to March 31, 2021, VAC responded to 1,583 requests, which resulted in our ATIP Office processing 442,358 pages.

Overview of the requests completed during the reporting period			
Type of request	Total requests closed during the reporting period	Total Pages Processed	Total Pages Disclosed
Access to information Formal	126	61,796	51,121
Access to Information Informal	171	20,153	16,386
Privacy Formal	1,286	360,409	291,782
Total	1,583	442,358	359,289

What follows in this report is an overview of our Department's performance on its administration of the Acts by providing an interpretation and an explanation of the data found in our reports to TBS, [2020-21 Statistical Report on the \*Access to Information Act\*](#) (attached as Annex D) and [2020-21 Statistical Report on the \*Privacy Act\*](#) (attached as Annex E).

### Access to Information Act

The ATIP Office processes formal and informal requests for government information.

#### Formal Requests

A formal request is a written request made under the *Access to Information Act* to the government institution that controls the record. There is a \$5.00 application fee, and the Department has 30 calendar days to respond. If extensions are required, applicants are notified in writing. The following provides key statistics for our performance on processing these formal requests over a number of reporting years.

Key Statistical Data for Formal Access Requests by Fiscal Year							
Fiscal year	Number of requests received	Number of requests carried over from previous reporting period	Total caseload	Number of requests closed	Number of pages reviewed for closed files	Number of pages disclosed	Number of requests carried over to next reporting period
2020-21	115	36	151	126	61,796	51,121	25
2019-20	211	38	249	213	68,564	53,545	36
2018-19	364	23	387	349	133,605	110,231	38
2017-18	331	54	385	362	119,761	108,649	23

Between April 1, 2020 and March 31, 2021, VAC received 115 formal requests for information under the *Access to Information Act*. On April 1, 2020, VAC carried forward 36 formal requests from the previous fiscal year. Combined with the 115 new formal requests received, a total of 151 requests required action by the Department during the 2020–2021 fiscal year. Of the 151 requests requiring action, 126 requests were completed.

We received fewer requests in this reporting year than last year, however, we continued to process a similar volume of pages to the 2019-2020 fiscal year. VAC sees this as a significant accomplishment given operational challenges due to the pandemic. We are interested in seeing whether or not a new trend may be emerging, specifically, whether there will continue to be a decrease in the number of requests which doesn't necessarily impact the volume of pages we process.

At the end of the 2020–2021 fiscal year, VAC carried forward 25 outstanding formal requests into the 2021–2021 fiscal year.

When pages are not disclosed, it is based on exemptions and exclusions.

**Sources of Formal Requests**

We received 68 requests from the general public, which represents 59% of our requests. The remaining requests came from the media (14), businesses (15), organizations (1) and academia (5). There were also 12 requesters that declined to identify.

### Completion Times

We completed 77.8% of our requests within the legislated timeline. In our statistical report to TBS, we cited interference with operations as being the main reason for not meeting the legislated timelines. However, it should be stated here that the operations of government were unprecedentedly affected during the reporting period due to COVID-19. During this transition time, the Government of Canada prioritized virtual network access to those employees responsible for processing COVID-19-related payments to Canadians. Our Department used this transition time to connect all employees to the Virtual Private Network so that they could access VAC systems.

Although the ATIP Office successfully gained remote access to the request processing software, we continued to need an employee to enter the office for those activities that could not be performed remotely, such as scanning paper records into the redaction software for processing, and mailing out records for requests.

### Extensions

During the reporting period, we received 20 requests requiring extensions. The reasons for the extensions were varied. Of the requests, ten involved a large volume of records which interfered with our operations. Nine of the requests involved records with Confidences of the Queen's Privy Council which required consultation with the Department of Justice. And one case involved records belonging to a third party which required consultation for proprietary reasons.

### Consultations Received from Other Government of Canada Institutions and Organizations

VAC received 23 requests (totaling 449 pages) for consultation from other Government of Canada institutions during the reporting period. We completed 20 of these requests, which resulted in processing 368 pages. Three of these requests were carried forward into the next reporting year.

### Disposition of Completed Requests

Approximately 84% of the requests completed were either disclosed in full, or disclosed in part. The following provides a breakdown of the disposition of completed requests.

Disposition of Requests	Requests Completed
All disclosed	56
Disclosed in part	50
Request abandoned	6
No records exist	13
All exempted	0
All excluded	1
Request transferred	0
Neither confirmed nor denied	0
Total	126

### Exemptions Invoked

Sections 13 to 24 of the Act provide specific exemptions for a government institution to withhold certain information when there is an identifiable need to do so. As a result, institutions can apply these

exemptions to records in order to withhold information in whole or in part. A record is disclosed in part when an exemption(s) is applied to appropriately safeguard information.

VAC cited 136 exemptions under the Act. The most common exemptions were section 19(1) which is a mandatory exemption to protect personal information (43 instances); section 16(2) for purposes of security (32 instances); and section 20 which protects third party information (16 instances).

### Exclusions Cited

The *Access to Information Act* does not apply to published material, material available for purchase by the public, material at Library and Archives of Canada or confidences of the Queen’s Privy Council of Canada (s. 69). Requests containing proposed exclusions under s. 69 require consultation with the Department of Justice and, in some cases, the Privy Council Office. During the reporting period, 25 requests contained information subject to Cabinet confidence.

### Translation

VAC did not receive any requests requiring translation during the 2020-2021 reporting period.

### Format of Access Formal Information Released

Of the formal requests processed, 20 were released in paper format, while the remaining 106 were released as electronic copies. Electronic copies are provided by CD or e-post. In summer 2020 VAC identified a need to be able to return documents electronically. ATIP Operations worked with Canada Post, procurement, and IT to introduce e-post as a solution and beginning in December 2020, VAC began using e-post to provide requesters with easier and more timely access to information. E-post is a service offered by Canada Post that provides an accessible, secure platform to share information. In 2020-2021, 10 requests were released by e-post.

### Informal Requests

An informal request for information is a request that is not made or processed under the Act. Fees are not charged, there are no deadlines for responding, and the requestor has no statutory right of complaint. Summaries of the formal requests are published monthly on the Open Government webpage and many Informal requests can be for records that were processed as a formal request, or can be a new request. The ATIP Office also processes some requests for personal information informally. For example, if a family member is looking for information about a Veteran deceased 20 years, this request is processed as an informal privacy request.

<b>Key Statistical Data for Informal Access Requests by Fiscal Year</b>				
<b>Fiscal year</b>	<b>Number of requests received</b>	<b>Number of requests closed</b>	<b>Number of pages reviewed for closed files</b>	<b>Number of pages disclosed</b>
2020-21	264	171	20,153	16,386

## Privacy Act

The ATIP Office processes formal requests for records containing personal information.

### Formal Requests

A formal request is a written request made under the *Privacy Act* to the government institution that controls the record. There is no application fee and the Department has 30 calendar days to respond. If extensions are required, applicants are notified in writing. The majority of requests are from Veterans seeking the records that Veterans Affairs Canada holds such as details of their applications and medical records. In addition, requests are received from current and former Veterans Affairs Canada employees who want to obtain their personal information. The following provides key statistics for our performance on processing these requests over a number of reporting years.

Key Statistical Data for Formal Privacy Requests by Fiscal Year							
Fiscal year	Number of requests received	Number of requests carried over from previous reporting period	Total caseload	Number of requests closed	Number of pages reviewed for closed files	Number of pages disclosed	Number of requests carried over to next reporting period
2020-21	1301	181	1482	1286	360,409	291,782	196
2019-20	1071	120	1191	1010	345,767	285,797	181
2018-19	948	93	1041	922	289,348	245,377	119
2017-18	941	99	1040	952	374,292	346,931	93

Between April 1, 2020, and March 31, 2021, the Department received 1301 formal requests for information under the *Privacy Act*, which represents an increase of 18% from 2019-2020 when VAC received 1071 requests. The number of requests we receive each year has been steadily increasing over the last several years. With the most significant increase occurring during this reporting period.

On April 1, 2020, VAC carried forward 181 formal requests from the previous year. Combined with the 1301 requests received in 2020–2021, a total of 1,482 requests were active during the 2020–2021 fiscal year. The Department completed 1286 formal requests during the reporting period, compared with 1010 formal requests completed in the previous year.

At the end of the 2019-2020 fiscal year, VAC carried forward 196 formal privacy requests into the 2021–2022 fiscal year.

### Completion Times

We completed 840 requests (65.3%) within the legislated timeline. In our statistical report to TBS, we cited interference with operations as being the main reason for not meeting the legislated timelines. However, it should be stated here that the operations of government were unprecedentedly affected during the reporting period due to COVID-19. During this transition time, the Government of Canada prioritized virtual network access to those employees responsible for processing COVID-19-related payments to Canadians. Our Department used this transition time to connect all employees to the Virtual Private Network so that they could access VAC systems.

Although the ATIP Office successfully gained remote access to the request processing software, we continued to need an employee to enter the office for those activities that could not be performed remotely, such as scanning paper records into the redaction software for processing, and mailing out records for requests.

### Extensions

During the reporting period, we received 48 requests requiring extensions. The majority of requests, 45, required a review of a large volume of pages and 3 were for external consultations. Under *the Privacy Act*, 30 days is the largest extension that can be granted.

### Consultations Received from Other Government of Canada Institutions and Organizations

VAC did not receive any requests for consultations from other government institutions or organizations during the reporting period.

### Disposition of Completed Requests

Approximately 93% of the requests completed were either disclosed in full, or disclosed in part. The following provides a breakdown of the disposition of completed requests.

Disposition of Requests	Requests completed
Disclosed in part	850
All disclosed	347
Request abandoned	42
No records exist	44
All exempted	0
All excluded	3
Neither confirmed nor denied	0
Total	1286

### Exemptions Invoked

Canadians have a right of access to their personal information. The *Privacy Act*, however, identifies specific exemptions for which the need for confidentiality of certain information is recognized. An exemption is a provision under the *Act* that authorizes the non-disclosure of certain personal information in response to a privacy request. We applied exemptions to 848 requests. The most frequently applied exemption was section 26, which allows for information to be withheld that relates to any individual other than the individual who made the request. This exemption ensures that the personal information of anyone, other than the requester, is protected. VAC invoked 837 exemptions under section 26 in 2020-2021.

### Exclusions Cited

Sections 69 and 70 of the *Privacy Act* set out exclusions. An exclusion is information to which the *Act* does not apply. Examples of exclusions include published material, material available for purchase by the public, material placed in the Library and Archives of Canada or confidences of the Queen's Privy Council for Canada. No exclusions were applied by VAC under sections 69 and 70.

## Translation

VAC did not receive any requests requiring translation during the 2020-2021 reporting period.

## Format of Information Released

Of the formal requests processed, 589 were released in paper format, 681 were released as electronic copies, while 16 were released both electronically and by paper. Electronic copies are provided by CD or epost. In December 2020, epost was utilized to provide requesters with easier and more timely access to information. Epost is a service offered by Canada Post that provides an accessible platform to share information. In 2020-2021, 31 requests were released by epost.

## Corrections and Notations

Under the *Privacy Act*, individuals are entitled to request correction and notation of personal information when they believe there is an error or an omission. We did not receive any requests for corrections and notations during the reporting period.

## Privacy Breaches

During the 2020-2021 fiscal year, 70 privacy breaches impacting 108 individuals were confirmed by VAC. A privacy breach involves sensitive personal information that could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals. This represents a 30% decrease compared to 2019-2020 when 99 breaches were confirmed and impacting 136 individuals. There was one material privacy breach to report in 2020-2021, impacting two individuals, compared to one material privacy breach in 2019-2020 impacting 25 individuals.

VAC treats every breach as a serious matter, and requires employees to report privacy incidents as soon as possible. In accordance with the Treasury Board Secretariat Directive on Privacy Practices and the Guidelines for Privacy Breaches, VAC reports only material privacy breaches to the Office of the Privacy Commissioner and the Treasury Board Secretariat. VAC's practice is consistent with other government institutions and Treasury Board Secretariat guidance.

## Privacy Impact Assessment

The purpose of a Privacy Impact Assessment (PIA) is to ensure that privacy implications or risks are appropriately identified, assessed and resolved before a new or substantially modified program or activity involving personal information is implemented.

In accordance with the Treasury Board Secretariat's Directive on Privacy Impact Assessment, the Department conducts Privacy Impact Assessments (PIAs) for new or substantially modified programs or activities involving personal information, including when services are contracted to another party. Initiatives are assessed and, when possible privacy concerns are identified, and mitigation strategies are developed to eliminate or lower the risk(s).

In recent years, VAC has seen less activity requiring PIAs, but has been using "Privacy, Information Management and Information Technology Security Needs Determination Reports" more and more to identify vulnerabilities in instances where PIAs are not required. These reports assess security, privacy, and information management risks on new initiatives, projects, and IT systems, allowing to mitigate any risks prior to implementation. During the 2020-2021 reporting period, 54 "Privacy, Information

Management and Information Technology Security Needs Determination Reports” were completed on various initiatives.

Moving forward, VAC is working towards digitization of the process to better document risks, track recommended mitigations, follow-up on recommended mitigation measures, and monitor and track compliance. As part of the “Strategic Partnership on Stewardship”, this process will allow VAC to move towards a “privacy by design approach”, providing upfront considerations. In addition, PIAs (existing and new) will be integrated into the Information and Data Strategy, to map data elements and build VAC’s Data Dictionary.

VAC did not submit any new PIAs to the Office of the Privacy Commissioner (OPC) nor the Treasury Board Secretariat (TBS).

### Public Interest Disclosures

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual’s consent. Paragraph 8(2)(m) allows institutions to release personal information if either the public interest in disclosure clearly outweighs any invasion of privacy that could result from disclosure, or if the disclosure would clearly benefit the individual to whom the information relates. VAC had no disclosures of personal information pursuant to paragraph 8(2)(m), during the 2019-2020 reporting period.

## Human Resources and Operational Costs

### Reporting on Fees for the *Service Fees Act*

VAC collects fees for formal requests under the *Access to Information Act*. As a result of the *Service Fees Act*, all government institutions that charge fees for services must report annually to Parliament on monies collected. This includes fees for access to information requests. The information below is reported in accordance with the requirements of section 20 of the *Service Fees Act*.

#### 2020-2021 Fees

Enabling Authority	<i>Access to Information Act</i> , Section 11
Fee amount	\$5 application fee
Total revenue	\$520
Fees waived	In accordance with the <i>Interim Directive on the Administration of the Access to Information Act</i> , issued on May 5, 2016, VAC waives all fees prescribed by the <i>Act</i> and <i>Regulations</i> , other than the \$5 application fee set out in paragraph 7(1)(a) of the <i>Regulations</i> . In 2020-2021, VAC waived application fees totaling \$55. An example of when fees are waived would be when a request is complex and covers three different topics. In order to respond in a timely manner, the request is split into three different requests but the requester is only charged for one request; the fees for the other two requests are waived.
Cost of operating the program	\$797,576

### Costs for Administering the *Access to Information Act*

To effectively manage workload, a number of employees in the VAC ATIP Office are involved in both the administration of the *Access to Information Act* and the *Privacy Act*. Six full-time employees (FTEs) were dedicated primarily to processing requests under the administration of the *Access to Information Act* in 2020-2021. These same FTEs were also responsible for processing complex privacy requests and proactive publication materials.

The VAC ATIP Office spent a total of \$797,576 to administer the *Access to Information Act* during the reporting period, of which \$763,371 was spent on salaries, \$22,701 for other administrative costs (operations and maintenance expenditures), and \$11,504 for overtime costs incurred in 2020-2021.

### Costs for Administering the *Privacy Act*

A total of 10 full-time FTEs were dedicated primarily to processing requests under the administration of the *Privacy Act* in 2020-2021. To effectively manage workload, a number of employees in the VAC ATIP Office are involved in both the administration of the *Access to Information Act* and the *Privacy Act*. 7 FTEs in the Privacy and IM Policy and Governance Unit coordinated privacy impact assessments, privacy breach investigations, training, guidance, and recommendations to ensure privacy compliance.

The VAC ATIP Office spent a total of \$1,671,182 to administer the *Privacy Act* during the reporting period, of which \$1,601,361 was spent on salaries, \$58,375 for other administrative costs, and \$11,446 on overtime costs were incurred in 2020-2021.

The costs identified above for administering the *Access to Information Act* and *Privacy Act* pertain only to expenses directly related to the VAC ATIP Office. They do not include time spent by program areas in the branches to compile and review records for access requests.

## Training and Awareness

Continued emphasis was placed on awareness training for departmental staff during 2020-2021. During this fiscal year, twelve sessions providing privacy awareness training were offered, six being an abridged introduction for new employees, and another six was customized to particular program areas. Four sessions were also offered to provide an overview of ATIP tailored to the specific program area. The following describes the training activities related to access to information and privacy with respective participants and sessions for each:

- **Condensed Privacy 101 Sessions**  
**230 Participants in 6 Sessions (4 English sessions and 2 French sessions)**  
Condensed Privacy 101 provides new employees with basic privacy principles they will need to be aware of in their new role as a public service employee. These include a brief overview of the need-to-know principle, as well as identifying privacy incidents and how to report them.
- **Privacy 101 Sessions**  
**185 Participants in 6 Sessions (5 English sessions and 1 French session)**  
These more customized sessions focus on promoting awareness of VAC's Privacy and Information Management Directorate role, explaining the legislative framework, defining what "personal information" means, familiarizing participants with Personal Information Banks and how they apply to their everyday work, reviewing consent and when it is needed, and lastly providing guidance on

what privacy breaches are and best practices to avoid them. In 2020-21, sessions were delivered various program areas including nurses, occupational therapists, Veteran Service Agents, and contractors. These sessions could include new employees (therefore a continuation of what was received in the Condenses Privacy 101 session), or represented a refresher for other employees.

- **ATIP 101 Training:**

- **140 Participants in 4 sessions (4 English)**

- These sessions provided employees with basic information about access to information and privacy, and their role as a public service employee. Subjects covered included: information sharing, improving retrieval processes and general education on ATIP and the legislation.

## Policies, Guidelines, Procedures and Initiatives

### Participating in the Review of Access to Information

In November 2020, the Treasury Board of Canada Secretariat invited government institutions to contribute to the [Review of Access to Information](#). We participated in this review by providing departmental feedback on three broad streams of exploration:

- Reviewing the legislative framework
- Finding opportunities to improve proactive publication to make information openly available
- Assessing processes and systems to improve service and reduce delays

Participating in this review was an important opportunity for our Department to give feedback on the access to information regime. Being open and transparent with Veterans and their families is important to the work we do.

### Publishing Information of Interest to Veterans, their Families and Canadians

We work to ensure that the information that is important to our Veterans and their families is available and easily found. One way we do this is our Department makes information available by way of the Open Government portal ([open.canada.ca](http://open.canada.ca)). This portal is a central repository for all federal institutions to publish their data and information for the public. Publishing information and meeting statutory deadlines for proactive publication is a shared responsibility at VAC.

Department	ATIP Office
Finance <ul style="list-style-type: none"> <li>— Contracts over \$10,000 (30 days after the quarter for Q1-Q3, 60 days after the quarter for Q4)</li> <li>— Grants and contributions over \$25,000 (30 days after the quarter)</li> <li>— Travel and hospitality expenses incurred by senior officials (30 days after the end of the month)</li> <li>— Minister’s Office expenses (all ministers’ offices expenses paid out of the Consolidated Revenue Fund, within 120 days after the end of the fiscal year)</li> </ul>	<ul style="list-style-type: none"> <li>— Briefing note titles and reference numbers (30 days after the end of the month received)</li> <li>— Package of briefing materials for new or incoming Ministers and Deputy Heads (120 days after appointment)</li> <li>— Question Period Notes (30 days after last sitting day in January and December)</li> <li>— Package of briefing materials for Ministers and Deputy Heads appearing before a committee of Parliament (120 days after appearance)<sup>1</sup></li> </ul>

<sup>1</sup> The packages of briefing materials for Ministers and Deputy Heads are published on our external webpage.

#### Human Resources

- Reclassification of positions (30 days after the end of the quarter in which there is a reclassification of an occupied position)

As illustrated above, proactively publishing information and meeting statutory deadlines is a shared responsibility at VAC, therefore, the ATIP Office prepared a series of process maps to assist departmental officials in identifying the various steps and requirements when publishing information of interest to Canadians.

### Updating VAC's Delegation Orders

Delegation orders seldom change, however, recent amendments to the *Access to Information Act* and the *Privacy Act* resulted in legislative changes which prompted the ATIP Office to review its delegation orders to ensure that they aligned with the amendments. We engaged the expertise of the Department of Justice and that of other government institutions in order to carry out a thorough review of our orders. These orders were updated in 2020-21 and were signed by the Minister of Veterans Affairs in March 2021.

### Enhancing Internal Services

The ATIP Office provides services to internal clients, such as audit and evaluation. We are engaged in reviewing documents for reasons such as the protection of small numbers and reviewing for sensitivities based on the intent of the Act for documents being published for the public or shared with third parties.

We work with program areas to ensure privacy principles are adhered to in relation to any information handling required to support the delivery of Departmental programs and services. We also provide advice, recommendations and assistance in sharing of information with other government institutions to support common objectives (e.g. CERB payments).

### Taking a Strategic Approach to Operations

During the reporting period, the Program Policy Team (which is comprised of two analysts) was created to provide additional support to the ATIP Operations teams. In its first year of inception, a key objective of this newly created unit was to create an organized space where the ATIP Operations Officers could find the documents and tools they require to do their job. This also included leading the development and in some instances implementation of internal procedures and guidance documents required by ATIP Operations employees (Access, Privacy and Client Services Unit) and for use by VAC employees. During the reporting period the team completed work on:

- Process maps for proactive publication
- Guidance on processing proactive publication requests
- Forms for the retrieval of records for Access to Information Requests
- Employee engagement articles on Right to Know Week and the Review of Access to Information
- Procedures manual for Privacy Unit
- Digitizing template letters
- Internal Checklists for processing and reviewing Access to Information and Privacy Requests

This work is ongoing and in the future we hope to continue to build on the success we have seen with the procedures and guidance documents we have created to date. Some of the work we are planning in the next reporting year includes:

- Procedure manual for Access Unit
- Procedures manual for employees responding to Access and Privacy requests
- Guidance for access retrievals
- Reporting dashboard for workload management
- Updated letters for requestors
- Guidance on the principles of severability
- Guidance on HR retrieval process
- Guidance on solicitor-client privilege
- Guidance on processing complex employee privacy requests (labour relations)

### Privacy, Information Management and Governance

The concept of “privacy by design” continues to be applied in initiatives to ensure that risks are eliminated or appropriately mitigated through the design process. By performing an assessment of privacy and information management risks on new initiatives, projects, and IT systems using personal information, VAC was able to mitigate privacy risks prior to implementation. During the 2020-2021 reporting period, 54 “Privacy, Information Management and Information Technology Security Needs Determination Reports” were completed on various initiatives.

## Summary of Key Issues and Actions Taken on Complaints or Audits

### *Complaints to the Privacy Commissioner*

Requesters are entitled to file a complaint with the Office of the Privacy Commissioner of Canada regarding the processing of their request. The Privacy Commissioner of Canada is an Officer of Parliament who receives complaints and independently investigates them.

VAC received 8 complaints which were filed with the Office of the Privacy Commissioner in relation to privacy requests. Six complaints were closed (3 were not well-founded, 1 was resolved, 1 was well-founded, and 1 was well-founded and resolved without recommendations).

### *Complaints to the Information Commissioner*

If a requester believes that government institutions have not respected their rights under the Act, they can complain to the Office of the Information Commissioner. The Information Commissioner is an Officer of Parliament who receives complaints and independently investigates them.

VAC received 6 complaints which were filed with the Office of the Information Commissioner in relation to access requests. Five complaints were closed (3 were not well-founded and two were resolved).

### *Audits*

There were no audits completed during the reporting period.

## Monitoring and Compliance

The ATIP Office produces monthly reports for senior management in order to monitor performance at VAC. These reports include data on privacy breaches, timeliness of retrieval of records, number of closed cases and number of cases and pages released. The VAC ATIP Office reviews the status of requests to

monitor deadlines, allocate resources and escalate outstanding retrievals. We are committed to improving completion times by undertaking more comprehensive reporting on our performance and our compliance with legislative requirements.

## Closing Remarks

We work to provide Veterans, their families and Canadians with the information they want and we strive to find ways to be faster and more efficient in this endeavour. For this reason, we are always looking for ways to improve so that we can provide better service to Canadians. This means looking at our challenges, and finding opportunities for improvement. We are committed to improving completion times by undertaking more comprehensive reporting, building internal capacity and expertise, reallocating resources as necessary, upgrading processing software, and working with program areas on information management practices.

Veterans and their families entrust us with their personal information every time they apply for and access our programs, services and benefits. We use this information to deliver services, programs and benefits to our clients. Protecting their personal information is a priority and we are committed to the proper handling and use of this information. We also look to a privacy-by-design approach when considering new initiatives. This means taking into account privacy from the very beginning. Accounting for privacy in the design phase of a new system and/or program provides opportunities to identify challenges in the implementation stage.

As we work in a new and evolving operational environment, we remain committed to providing the best possible service to Veterans, their families and Canadians, and we continue to look for ways to do better in this endeavor.

## Annex A – Office of the Veterans Ombudsman Annual Reports

# Office of the Veterans Ombud Access to Information and Privacy

## **Introduction:**

Accessing information is an essential element of our system of democracy, and a means for the Government of Canada to be open and transparent. The *Access to Information Act* is an important tool for Canadians to obtain information held by the Government of Canada. The *Act* provides the right of access to records under the control of a government institution, subject to some exceptions. The *Act* complements other methods for obtaining government information and does not limit in any way the access to government information that is normally available to the public upon request.

This annual report on the administration to the *Access to Information Act* describes how the Office of the Veterans Ombud fulfilled their responsibilities under the *Access to Information Act* during the fiscal year April 1, 2020 to March 31, 2021. This report is prepared and tabled in Parliament in accordance with section 72 of the *Access to Information Act*.

The mandate of the OVO is to:

- Review and address complaints by Veterans and other individuals served by VAC and their representatives arising from the application of the provisions of the *Veterans Bill of Rights*;
- Identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department's behalf that impact negatively on Veterans and other individuals served by VAC;
- Review and address complaints by Veterans and other individuals served by VAC and their representatives related to programs and services provided or administered by the Department or by third parties on the Department's behalf, including decisions related to the programs and services for which there is no right of appeal to the Veterans Review and Appeal Board;
- Review systemic issues related to the Veterans Review and Appeal Board; and,
- Facilitate access by stakeholders to programs and services by providing them with information and referrals.

## **Organizational Structure:**

The Veterans Ombud, Deputy Ombud and Executive Director, Legal Advisor, and Director – Corporate Services and Charlottetown Operations have full authority for the OVO to exercise the powers, duties, and functions of the Minister as the Head of Veterans Affairs under the provisions of the *Acts* and related regulations. Although four positions have been delegated full authority, the Director – Corporate Services and Charlottetown Operations, is responsible for management of the Access to Information and Privacy Unit function within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both acts are met. Processing of requests is centralized within the unit. The Unit consists of the Director - Corporate Services and Charlottetown Operations, Knowledge Management Coordinator and Internal Services Project Officer. These staff members were assigned to the administration of both acts on a part time (as required) basis during the 2020-21 reporting period, which represents 0.30 of a FTE.

The main activities of the OVO ATIP Unit include:

- Processing OVO requests for information submitted under the *Access to Information Act* and *The Privacy Act*, including consulting with other federal departments and third parties with respect to ATIP requests received;
- Developing OVO policies, procedures, guidelines and processes in support of Access to Information and Privacy and central agency requirements;
- Monitoring legislative and regulatory changes that impact ATIP;
- Providing awareness and training on ATIP to ensure that OVO employees understand their roles and responsibilities;
- Monitoring OVO compliance with both acts, regulations and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament on the administration of the *Acts*;
- Leading the development of Privacy Impact Assessments (PIAs) for the OVO;
- Working closely with VAC for the resolution of any complaints against OVO which have been submitted to the Information Commissioner of Canada and the Privacy Commissioner of Canada;
- Providing centralized management of privacy breaches within the OVO;
- Providing advice, guidance and training to OVO staff on ATIP issues;
- Analyzing and responding to OVO privacy and access to information policy issues;
- Reviewing new and amended OVO forms and processes that impact the collection of personal information
- Developing appropriate Privacy Notice Statements for the OVO; and,
- Evaluating OVO contracts and Memoranda of Understanding.

### **Delegation Order:**

The responsibilities associated with the administration of the *Access to Information Act* are delegated to departmental and OVO officials through a delegation order.

### **Highlights of the Statistical Report 2020-21:**

- All requests were responded to within the legislative timelines
- There were 0 consultations with other institutions
- There were no extensions of timelines

The completed statistical report for 2020-21 is included.

### **Training and Awareness:**

OVO staff took part in Departmental ATIP training and OVO ATIP Refresher training.

### **Policies, Guidelines, Procedures and Initiatives**

The OVO continues to work on an Open Government action plan and will continue the transition to having more information available on the Open Government portal. The OVO has completed the required steps to be part of ATIP Online Request Services (AORS) where users can submit ATIP requests online and view past ATI requests by subject.

The OVO also maintained and monitored current Access to Information policies, guidelines and procedures during the 2020-21 reporting period.

### **Summary of Key Issues and Actions Taken on Complaints or Audits:**

In the 2020-21 reporting period, OVO received no complaints in relation to Access to Information. No complaints were carried over from 2019-20. The OVO had no audits or investigations concluded during the reporting period.

### **Monitoring Compliance:**

The OVO uses a tracking spreadsheet to monitor the processing of requests for access to information on a weekly basis when requests are being processed. This tracking spreadsheet is maintained by the Knowledge Management Coordinator. Any anticipated issues with processing are escalated to the Director – Corporate Services and Charlottetown Operations.

### **Reporting on Access to Information fees for the purposes of the *Service Fees Act***

- Enabling authority: Access to Information Act
- Fee Amount: \$0.00
- Total Revenue: \$0.00
- Fees Waived: All fees were waived for the 2020 to 2021 fiscal period.
- Cost to operate program \$19896

## Office of the Veterans Ombud Access to Information and Privacy Unit

### Introduction:

The Office of the Veterans Ombud (OVO) takes the responsibility to protect the privacy of Veterans and their families very seriously. Privacy is a fundamental right in Canada. The *Privacy Act* operates to protect Canadians with respect to their personal information held by the Government of Canada.

The *Act* provides Canadian citizens and permanent residents with the general right to access and seek correction of their personal information that is held by the federal government. Under the *Privacy Act*, “personal information” is defined as “information about an identifiable individual that is recorded in any form.” Examples include information about national or ethnic origin, colour, religion, age or marital status of an individual; education or medical, criminal, financial or employment history of an individual; and, any identifying number, symbol or other particular identifier assigned to an individual.

The *Act* also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information. Personal information may only be used for the purposes allowed by the *Privacy Act*, and may only be disclosed in accordance with the legislation.

This annual report on the administration to the *Privacy Act* describes how the Office of the Veterans Ombud fulfilled their responsibilities under the *Privacy Act* during the fiscal year April 1, 2020 to March 31, 2021. This report is prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*.

The mandate of the OVO is to:

- Review and address complaints by Veterans and other individuals served by VAC and their representatives arising from the application of the provisions of the *Veterans Bill of Rights*;
- Identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department’s behalf that impact negatively on Veterans and other individuals served by VAC;
- Review and address complaints by Veterans and other individuals served by VAC and their representatives related to programs and services provided or administered by the Department or by third parties on the Department’s behalf, including decisions related to the programs and services for which there is no right of appeal to the Veterans Review and Appeal Board;
- Review systemic issues related to the Veterans Review and Appeal Board; and,
- Facilitate access by stakeholders to programs and services by providing them with information and referrals.

## **Organizational Structure:**

The Veterans Ombud, Deputy Ombud and Executive Director, Legal Advisor, and Director – Corporate Services and Charlottetown Operations have full authority for the OVO to exercise the powers, duties, and functions of the Minister as the Head of Veterans Affairs under the provisions of the *Acts* and related regulations. Although four positions have been delegated full authority, the Director – Corporate Services and Charlottetown Operations, is responsible for management of the Access to Information and Privacy Unit function within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both acts are met. Processing of requests is centralized within the unit. The Unit consists of the Director - Corporate Services and Charlottetown Operations, Knowledge Management Coordinator and Internal Services Project Officer. These staff members were assigned to the administration of both acts on a part time (as required) basis during the 2020-21 reporting period, which represents 0.26 of a FTE.

The main activities of the OVO ATIP Unit include:

- Processing OVO requests for information submitted under the *Access to Information Act* and *The Privacy Act*, including consulting with other federal departments and third parties with respect to ATIP requests received;
- Developing OVO policies, procedures, guidelines and processes in support of Access to Information and Privacy and central agency requirements;
- Monitoring legislative and regulatory changes that impact ATIP;
- Providing awareness and training on ATIP to ensure that OVO employees understand their roles and responsibilities;
- Monitoring OVO compliance with both acts, regulations and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament on the administration of the *Acts*;
- Leading the development of Privacy Impact Assessments (PIAs) for the OVO;
- Working closely with VAC for the resolution of any complaints against OVO which have been submitted to the Information Commissioner of Canada and the Privacy Commissioner of Canada;
- Providing centralized management of privacy breaches within the OVO;
- Providing advice, guidance and training to OVO staff on ATIP issues;
- Analyzing and responding to OVO privacy and access to information policy issues;
- Reviewing new and amended OVO forms and processes that impact the collection of personal information
- Developing appropriate Privacy Notice Statements for the OVO; and,
- Evaluating OVO contracts and Memoranda of Understanding.

### **Delegation Order:**

The responsibilities associated with the administration of the *Privacy Act* are delegated to departmental and OVO officials through a delegation order.

### **Highlights of the Statistical Report 2020-21:**

- All requests were responded to within the legislated timelines
- There were no extensions of timelines
- There was no consultation with other institutions

The completed statistical report for 2020-21 is included.

### **Training and Awareness:**

OVO staff took part in Departmental ATIP training and OVO ATIP Refresher training.

### **Policies, Guidelines, Procedures and Initiatives**

The OVO continues to work on an Open Government action plan and will continue the transition to having more information available on the Open Government portal. The OVO has completed the required steps to be part of ATIP Online Request Services (AORS) where users can submit ATIP requests online and view past ATI requests by subject.

The OVO also maintained and monitored current Access to Information policies, guidelines and procedures during the 2020-21 reporting period.

### **Summary of Key Issues and Actions Taken on Complaints or Audits:**

In the 2020-21 reporting period, OVO received no complaints in relation to privacy requests. No complaints were carried over from 2019-20. The OVO had no audits or investigations concluded during the reporting period.

### **Monitoring Compliance:**

The OVO uses a tracking spreadsheet to monitor the processing of requests for access to information on a weekly basis when requests are being processed. This tracking spreadsheet is maintained by the Knowledge Management Coordinator. Any anticipated issues with processing are escalated to the Director – Corporate Services and Charlottetown Operations.

**Material Privacy Breaches:**

There were no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the reporting period.

**Privacy Impact Assessments:**

There were no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the reporting period.

**Public Interest Disclosures:**

There were no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the reporting period.



## Statistical Report on the Access to Information Act

Name of institution: Office of the Veterans Ombud

Reporting period: 2020/04/01 to 2021/03/31

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

#### 1.1 Number of requests

	Number of Requests
Received during reporting period	6
Outstanding from previous reporting period	0
<b>Total</b>	<b>6</b>
Closed during reporting period	6
Carried over to next reporting period	0

#### 1.2 Sources of requests

Source	Number of Requests
Media	4
Academia	0
Business (private sector)	0
Organization	0
Public	2
Decline to Identify	0
<b>Total</b>	<b>6</b>

#### 1.3 Informal requests

Completion Time							
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
0	0	0	0	0	0	0	0

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

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

	Number of Requests
Outstanding from previous reporting period	0
Sent during reporting period	0
<b>Total</b>	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	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	3	0	0	0	0	0	3
Disclosed in part	0	2	0	0	0	0	0	2
All exempted	1	0	0	0	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Decline to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0
<b>Total</b>	1	5	0	0	0	0	0	6

### 3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	0	16(2)	0	18(a)	0	20.1	0
13(1)(b)	0	16(2)(a)	0	18(b)	0	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	0	18(d)	0	21(1)(a)	1
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	0
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	0
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	0	21(1)(d)	0
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	0
15(1)	0	16.1(1)(d)	0	19(1)	3	22.1(1)	0
15(1) - I.A.*	0	16.2(1)	0	20(1)(a)	0	23	0
15(1) - Def.*	0	16.3	0	20(1)(b)	0	23.1	0
15(1) - S.A.*	0	16.31	0	20(1)(b.1)	0	24(1)	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	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
Declined to act with the approval of the Information Commissioner	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

### 3.6 Closed requests

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

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	6
Percentage of requests closed within legislated timelines (%)	100

### 3.7 Deemed refusals

#### 3.7.1 Reasons for not meeting legislated timelines

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

### 3.7.2 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	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
<b>Total</b>	0	0	0

### 3.8 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

## Section 4: Extensions

### 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		9(1)(c) Third-Party Notice
		Section 69	Other	
All disclosed	0	0	0	0
Disclosed in part	0	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
Decline to act with the approval of the Information Commissioner	0	0	0	0
<b>Total</b>	0	0	0	0

### 4.2 Length of extensions

Length of Extensions	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
30 days or less	0	0	0	0
31 to 60 days	0	0	0	0
61 to 120 days	0	0	0	0
121 to 180 days	0	0	0	0
181 to 365 days	0	0	0	0
365 days or more	0	0	0	0
<b>Total</b>	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 orders issued by the Information Commissioner
0	0	0	0	0	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 (after June 21, 2019)				
Complainant (1)	Institution (2)	Third Party (3)	Privacy Commissioner (4)	Total
0	0	0	0	0

## Section 10: Resources Related to the Access to Information Act

### 10.1 Costs

Expenditures	Amount
Salaries	\$19,896
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
<b>Total</b>	<b>\$19,896</b>

### 10.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	0.300
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
<b>Total</b>	<b>0.300</b>

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

## Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombud  
 Reporting period: 2020/04/01 to 2021/03/31

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

#### 1.1 Number of requests

	Number of Requests
Received during reporting period	7
Outstanding from previous reporting period	0
<b>Total</b>	<b>7</b>
Closed during reporting period	6
Carried over to next reporting period	1

### Section 2: Requests Closed During the Reporting Period

#### 2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	6	0	0	0	0	0	6
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>

TBS/SCT 350-63



#### 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	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

### 2.3 Exclusions

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

Paper	Electronic	Other
0	6	0

### 2.5 Complexity

#### 2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
1001	1001	6

#### 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	5	280	0	0	1	721	0	0	0	0
Disclosed in part	0	0	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	0	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>	5	280	0	0	1	721	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	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 Closed requests

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

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	6
Percentage of requests closed within legislated timelines (%)	100

### 2.7 Deemed refusals

#### 2.7.1 Reasons for not meeting legislated timelines

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







16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>									

**Section 8: Complaints and Investigations 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**

Personal Information Banks	Active	Created	Terminated	Modified
	0	0	0	0

**Section 10: Material Privacy Breaches**

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

**Section 11: Resources Related to the Privacy Act**

**11.1 Costs**

Expenditures	Amount
Salaries	\$16,553
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
<b>Total</b>	<b>\$16,553</b>

**11.2 Human Resources**

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.260
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
<b>Total</b>	<b>0.260</b>

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

## Annex B - Delegation Order – *Access to Information Act*



*Access to Information Act*  
Delegation Order

*Loi sur l'accès à l'information*  
Ordonnance de délégation

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I, Lawrence MacAulay, Minister of Veterans Affairs Canada, do hereby delegate, pursuant to section 95 of the *Access to Information Act*, the officers or employees of Veterans Affairs Canada who hold the positions set out in the attached Delegation Orders to exercise or perform the powers, duties, or functions that have been given to me as head of a government institution under the provisions of the *Access to Information Act* as set out in the Delegation Order.

This designation replaces all previous delegation orders.

Je soussigné, Lawrence MacAulay, ministre d'Anciens Combattants Canada, délègue par la présente, conformément à l'article 95 de la *Loi sur l'accès à l'information*, les dirigeants ou les employés d'Anciens Combattants Canada qui occupent les postes indiqués dans les Ordonnances de délégation ci-jointe pour exercer les pouvoirs et les fonctions qui m'ont été conférés en tant que responsable d'une institution fédérale en vertu des dispositions de la *Loi sur l'accès à l'information*, comme indiqué dans Ordonnance de délégation.

Cette désignation remplace tous les arrêtés de délégation antérieurs.

The Minister of Veterans Affairs Canada  
Ministre, Anciens Combattants Canada

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Lawrence MacAulay  
Minister of Veterans Affairs  
Ministère des Anciens Combattants

Signed in Ottawa, Ontario, Canada this 25<sup>th</sup> day of March, 2021  
Signé à Ottawa, Ontario, Canada ce 25<sup>e</sup> jour de mars 2021

## Delegation Order - Access to Information Act and Regulations

The Minister of Veterans Affairs, pursuant to section 95 of the *Access to Information Act* (the Act), hereby delegates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the Act and the *Access to Information Act Regulations* (the Regulations) set out in the schedule opposite each position. This designation replaces all previous delegation orders.

All powers, duties and functions under the *Access to Information Act*, R.S.C. 1985, c. A-1 (prior to and following June 21, 2019) and related regulations (prior to and following June 21, 2019)

### *Access to Information Act* – Delegation Order

<b>Description</b>	<b>Section</b>	<b>Delegated Authority</b>
Responsibility of government institutions	4(2.1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Directors General</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> <li>• Officer, Access to Information and Privacy</li> </ul>
Reasons for declining to act on request	6.1(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Notice - suspension	6.1(1.3)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> </ul>

		<ul style="list-style-type: none"> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Notice – end of suspension	6.1(1.4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Notice (written notice for declining to act on a request)	6.1(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Notice where access requested / Giving access to record	7	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> <li>• Officer, Access to Information and Privacy</li> </ul>
Transfer of request to another government institution	8(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> </ul>

		<ul style="list-style-type: none"> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Extension of time limits	9	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Notice where access refused	10	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Application fee waiver	11(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> </ul>

		<ul style="list-style-type: none"> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Language of access	12(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> <li>• Officer, Access to Information and Privacy</li> </ul>
Access in an alternative format	12(3)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Information obtained in confidence	13	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> </ul>

		<ul style="list-style-type: none"> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Federal-provincial affairs	14	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – International affairs and defence	15	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Law enforcement and investigations	16	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

		<ul style="list-style-type: none"> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – <i>Public Servants Disclosure Protection Act</i>	16.5	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Refuse access – Safety of individuals	17	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Economic interests of Canada	18	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access –	18.1	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> </ul>

Economic interest of certain government institutions		<ul style="list-style-type: none"> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Personal information	19	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Third party information	20	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Operations of Government	21	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> </ul>

		<ul style="list-style-type: none"> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Testing procedures, tests and audits	22	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Internal audits	22.1	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Protected information – solicitors, advocates, and notaries	23	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> </ul>

		<ul style="list-style-type: none"> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Protected information- patents and trademarks	23.1	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse access – Statutory prohibitions against disclosure	24	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Severability	25	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

		<ul style="list-style-type: none"> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refusal of access if information to be published	26	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Notice to third parties	27(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Third party notification – Extension of time limit	27(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>

Third party notification – Notice of decision	28(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Third party notification – Waive representations in writing	28(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Third party notification – Disclosure of record	28(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Advising Information Commissioner of third party involvement	33	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

		<ul style="list-style-type: none"> <li>• Manager, Access to Information and Privacy</li> </ul>
Right to make representations	35(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Access to be given to complainant	37(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Review by Federal Court – government institution	41(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Review by Federal Court – government institution- Respondents	41(5)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> </ul>

		<ul style="list-style-type: none"> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Notice to third party (application to Federal Court)	43(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Service or notice	43(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Notice to person who requested record	44(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Special rules for hearings	52(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

Ex parte representations (Federal Court)	52(3)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Annual report to Parliament	94	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

*Access to Information Regulations – Delegated Authorities*

Description	Section	Delegated authority
Transfer of request	6(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>

		<ul style="list-style-type: none"> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Search and preparation of fees	7(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Production and programming	7(3)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>

Providing access to records	8	<ul style="list-style-type: none"><li>• Deputy Minister</li><li>• Associate Deputy Minister</li><li>• Assistant Deputy Minister, Corporate Services</li><li>• Director General, Information Technology, Information Management and Administration</li><li>• Director, Privacy and Information Management</li></ul>
Limitations in respect of format	8.1	<ul style="list-style-type: none"><li>• Deputy Minister</li><li>• Assistant Deputy Minister, Corporate Services</li><li>• Director General, Information Technology, Information Management and Administration</li><li>• Directors General</li><li>• Director, Privacy and Information Management</li></ul>

## Annex C – Delegation Order – *Privacy Act*



*Privacy Act*  
Delegation Order

*Loi sur la protection des renseignements  
personnels*  
Ordonnance de délégation

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I, Lawrence MacAulay, Minister of Veterans Affairs Canada, do hereby designate, Pursuant to section 73 of the *Privacy Act*, the officers or employees of Veterans Affairs Canada who hold the positions set out in the attached Delegation Orders to exercise or perform the powers, duties, or functions that have been given to me as head of a government institution under the provisions of the *Privacy Act* as set out in the Delegation Order.

This designation replaces all previous delegation orders.

Je soussigné, Lawrence MacAulay, ministre d'Anciens Combattants Canada, désigne par la présente, conformément à l'article 73 de la *Loi sur la protection des renseignements personnels*, les dirigeants ou les employés d'Anciens Combattants Canada qui occupent les postes indiqués dans les Ordonnances de délégation ci-jointe pour exercer les pouvoirs et les fonctions qui m'ont été conférés en tant que responsable d'une institution fédérale en vertu des dispositions de la *Loi sur la protection des renseignements personnels*, comme indiqué dans l'Ordonnance de délégation.

Cette désignation remplace tous les arrêtés de délégation antérieurs.

The Minister of Veterans Affairs Canada  
Ministre, Anciens Combattants Canada

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Lawrence MacAulay  
Minister of Veterans Affairs  
Ministère des Anciens Combattants

Signed in Ottawa, Ontario, Canada this 25<sup>th</sup> day of March, 2021  
Signé à Ottawa, Ontario, Canada ce 25<sup>e</sup> jour de mars 2021

## Delegation Order - Privacy Act

The Minister of Veterans Affairs, pursuant to section 73 of the *Privacy Act*, hereby delegates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the *Act* and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

*All powers, duties and functions under the Privacy Act (prior to and following June 21, 2019) and related regulations (prior to and following June 21, 2019)*

<b>Description</b>	<b>Section</b>	<b>Delegated Authority</b>
Disclosure for research or statistical purposes	8(2)(j)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Directors General</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> <li>• Manager, Safety and Security Services</li> <li>• Manager, Litigation Coordination Unit</li> <li>• Case Manager, Field Operations Division</li> </ul>
Disclosure in the public interest or in the interest of the individual	8(2)(m)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Retention of a record of requests and disclosed records to investigative bodies under section 8(2)(e) of the <i>Privacy Act</i>	8(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> </ul>

		<ul style="list-style-type: none"> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Notice of disclosure under paragraph 8(2)(m)	8(5)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Record of disclosures to be retained	9(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Directors General</li> <li>• Director, Privacy and Information Management</li> </ul>
Notification of the Privacy Commissioner of any new consistent uses of personal information and ensure use is included in next statement of consistent uses set forth in the Index	9(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Personal information to be included in personal information banks	10	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

		<ul style="list-style-type: none"> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Notice where access requested	14(a)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Giving access to the record	14(b)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> <li>• Officer, Access to Information and Privacy</li> </ul>
Extension of the 30 day time limit to respond to a privacy request	15	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

		<ul style="list-style-type: none"> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> <li>• Officer, Access to Information and Privacy</li> </ul>
Decision on whether to translate a response to a privacy request in one of the two official languages	17(2)(b)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> <li>• Officer, Access to Information and Privacy</li> </ul>
Decision on whether to convert personal information to an alternate format	17(3)(b)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Decision to refuse to disclose personal information contained in an exempt bank	18(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

		<ul style="list-style-type: none"> <li>• Manager, Access to Information and Privacy</li> </ul>
Personal information obtained in confidence	19	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse to disclose personal information that may be injurious to federal-provincial affairs	20	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse to disclose personal information that may be injurious to international affairs or the defence of Canada or one of its allies	21	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>

<p>Refuse to disclose personal information prepared by an investigative body, information injurious to the enforcement of a law, or information injurious to the security of penal institutions</p>	<p>22</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
<p>Refuse to disclose personal information created for the <i>Public Servants Disclosure Protection Act</i></p>	<p>22.3</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
<p>Refuse to disclose personal information prepared by an investigative body for security clearance</p>	<p>23</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
<p>Refuse to disclose personal information that was collected by the Canadian Penitentiary Service, the National Parole Service or the National Parole Board while the individual was</p>	<p>24</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> </ul>

<p>under sentence if the conditions in the section are met</p>		<ul style="list-style-type: none"> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
<p>Refuse to disclose personal information which could threaten the safety of individuals</p>	<p>25</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
<p>Refuse to disclose personal information about another individual and shall refuse to disclose such information where disclosure is prohibited under section 8</p>	<p>26</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
<p>Refuse to disclose personal information that is subject to solicitor-client privilege</p>	<p>27</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

		<ul style="list-style-type: none"> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Refuse to disclose personal information relating to the individual's physical or mental health where the disclosure is contrary to the best interests of the individual	28	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Receive notice of investigation by the Privacy Commissioner	31	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Right to make representations to the Privacy Commissioner during an investigation	33(2)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>

		<ul style="list-style-type: none"> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Receive Privacy Commissioner's report of findings of an investigation and give notice of action taken	35(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Provision of addition personal information to a complainant after receiving a 35(1)(b) notice	35(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Receive Privacy Commissioner's report of findings of investigation of exempt bank	36(3)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>

<p>Receive report of Privacy Commissioner's findings after compliance investigation</p>	<p>37(3)</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
<p>Request that a court hearing, undertaken with respect to certain sections of the Act, be held in the National Capital Region</p>	<p>51(2)(b)</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
<p>Request and be given right to make representations in section 51 hearings</p>	<p>51(3)</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
<p>Prepare annual report to Parliament</p>	<p>72(1)</p>	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Minister, Corporate Services</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

Privacy Regulations – Delegated Authorities

Description	Section	Delegated authority
Retention of personal information requested under paragraph 8(2)(e)	7	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Allow examination of the documents (Reading Room)	9	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> <li>• Team Leader, Access to Information and Privacy</li> </ul>
Notification concerning corrections	11(2),(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Correction refused, notation placed on file	11(4)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Director General, Information Technology, Information</li> </ul>

		<p>Management and Administration</p> <ul style="list-style-type: none"> <li>• Director, Privacy and Information Management</li> <li>• Manager, Access to Information and Privacy</li> </ul>
Disclosure to a medical practitioner or psychologist	13(1)	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>
Examination in presence of medical practitioner or psychologist	14	<ul style="list-style-type: none"> <li>• Deputy Minister</li> <li>• Associate Deputy Minister</li> <li>• Assistant Deputy Ministers</li> <li>• Director General, Information Technology, Information Management and Administration</li> <li>• Director, Privacy and Information Management</li> </ul>

## Annex D – Statistical Report on the *Access to Information Act*



## Statistical Report on the Access to Information Act

Name of institution: Veterans Affairs Canada

Reporting period: 2020/04/01 to 2021/03/31

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

#### 1.1 Number of requests

	Number of Requests
Received during reporting period	115
Outstanding from previous reporting period	36
<b>Total</b>	<b>151</b>
Closed during reporting period	126
Carried over to next reporting period	25

#### 1.2 Sources of requests

Source	Number of Requests
Media	14
Academia	5
Business (private sector)	15
Organization	1
Public	68
Decline to Identify	12
<b>Total</b>	<b>115</b>

#### 1.3 Informal requests

Completion Time							
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
21	26	44	39	18	14	9	171

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

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

	Number of Requests
Outstanding from previous reporting period	0
Sent during reporting period	0
<b>Total</b>	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	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	4	44	8	0	0	0	0	56
Disclosed in part	2	17	7	6	5	5	8	50
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	1	0	1
No records exist	3	10	0	0	0	0	0	13
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	4	0	0	2	0	0	0	6
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
<b>Total</b>	13	71	15	8	5	6	8	126

### 3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	0	16(2)	3	18(a)	3	20.1	0
13(1)(b)	1	16(2)(a)	0	18(b)	0	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	29	18(d)	0	21(1)(a)	1
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	3
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	12
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	0	21(1)(d)	3
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	1
15(1)	0	16.1(1)(d)	0	19(1)	43	22.1(1)	0
15(1) - I.A.*	0	16.2(1)	0	20(1)(a)	1	23	10
15(1) - Def.*	0	16.3	0	20(1)(b)	3	23.1	0
15(1) - S.A.*	0	16.31	0	20(1)(b.1)	0	24(1)	8
16(1)(a)(i)	0	16.4(1)(a)	0	20(1)(c)	12	26	0



Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>74</b>	<b>1398</b>	<b>17</b>	<b>3112</b>	<b>6</b>	<b>3909</b>	<b>14</b>	<b>28343</b>	<b>2</b>	<b>14359</b>

### 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	23	0	1	0	24
All exempted	0	0	0	0	0
All excluded	2	0	0	0	2
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0
<b>Total</b>	<b>25</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>26</b>

### 3.6 Closed requests

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

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	98
Percentage of requests closed within legislated timelines (%)	77.8

### 3.7 Deemed refusals

#### 3.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
28	11	7	0	10

### 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	4	1	5
16 to 30 days	5	1	6
31 to 60 days	1	1	2
61 to 120 days	1	0	1
121 to 180 days	1	1	2
181 to 365 days	1	6	7
More than 365 days	1	4	5
<b>Total</b>	<b>14</b>	<b>14</b>	<b>28</b>

### 3.8 Requests for translation

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

## Section 4: Extensions

### 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		9(1)(c) Third-Party Notice
		Section 69	Other	
All disclosed	0	0	0	0
Disclosed in part	10	8	0	1
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	1	0	0
Request abandoned	0	0	0	0
Decline to act with the approval of the Information Commissioner	0	0	0	0
<b>Total</b>	<b>10</b>	<b>9</b>	<b>0</b>	<b>1</b>

### 4.2 Length of extensions

Length of Extensions	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
30 days or less	3	0	0	0
31 to 60 days	3	3	0	1
61 to 120 days	4	5	0	0
121 to 180 days	0	0	0	0
181 to 365 days	0	1	0	0
365 days or more	0	0	0	0
<b>Total</b>	<b>10</b>	<b>9</b>	<b>0</b>	<b>1</b>

## Section 5: Fees

Fee Type	Fee Collected		Fee Waived or Refunded	
	Requests	Amount	Requests	Amount
Application	104	\$520	11	\$55
Other fees	0	\$0	0	\$0
<b>Total</b>	104	\$520	11	\$55

## 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	23	449	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	23	449	0	0
Closed during the reporting period	20	368	0	0
Carried over to next reporting period	3	81	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	
Disclose entirely	9	5	0	0	0	0	0	14
Disclose in part	4	1	1	0	0	0	0	6
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
<b>Total</b>	13	6	1	0	0	0	0	20



## 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 orders issued by the Information Commissioner
1	0	0	5	0	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 (after June 21, 2019)				
Complainant (1)	Institution (2)	Third Party (3)	Privacy Commissioner (4)	Total
0	0	0	0	0

## Section 10: Resources Related to the Access to Information Act

### 10.1 Costs

Expenditures	Amount
Salaries	\$763,371
Overtime	\$11,504
Goods and Services	\$22,701
• Professional services contracts	\$0
• Other	\$22,701
<b>Total</b>	<b>\$797,576</b>

### 10.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	8.800
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.130
<b>Total</b>	<b>8.930</b>

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

## Annex E – Statistical Report on the *Privacy Act*

## Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada  
 Reporting period: 2020/04/01 to 2021/03/31

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

#### 1.1 Number of requests

	Number of Requests
Received during reporting period	1301
Outstanding from previous reporting period	181
<b>Total</b>	<b>1482</b>
Closed during reporting period	1286
Carried over to next reporting period	196

### Section 2: Requests Closed During the Reporting Period

#### 2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	124	139	51	20	6	7	0	347
Disclosed in part	189	299	114	113	46	78	11	850
All exempted	0	0	0	0	0	0	0	0
All excluded	3	0	0	0	0	0	0	3
No records exist	18	16	4	4	2	0	0	44
Request abandoned	24	8	5	1	2	1	1	42
Neither confirmed nor denied	0	0	0	0	0	0	0	0
<b>Total</b>	<b>358</b>	<b>462</b>	<b>174</b>	<b>138</b>	<b>56</b>	<b>86</b>	<b>12</b>	<b>1286</b>

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#### 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)	2	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	837
19(1)(f)	0	22.1	0	27	6
20	0	22.2	0	27.1	0
21	0	22.3	0	28	3
		22.4	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

Paper	Electronic	Other
589	592	16

## 2.5 Complexity

### 2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
360,409	291,782	1242

### 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	291	4932	39	6073	10	4208	7	7281	0	0
Disclosed in part	494	13231	192	34027	78	44936	82	159686	4	15100
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	3	0	0	0	0	0	0	0	0	0
Request abandoned	38	4	2	100	1	384	1	1820	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>826</b>	<b>18167</b>	<b>233</b>	<b>40200</b>	<b>89</b>	<b>49528</b>	<b>90</b>	<b>168787</b>	<b>4</b>	<b>15100</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	9	0	0	0	9
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>9</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9</b>

## 2.6 Closed requests

### 2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	840
Percentage of requests closed within legislated timelines (%)	65.3

## 2.7 Deemed refusals

### 2.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
446	421	1	0	24

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

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	87	3	90
16 to 30 days	79	0	79
31 to 60 days	79	6	85
61 to 120 days	65	6	71
121 to 180 days	41	8	49
181 to 365 days	53	14	67
More than 365 days	1	4	5
<b>Total</b>	405	41	446

### 2.8 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

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
6	0	0	6

### Section 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

### Section 5: Extensions

#### 5.1 Reasons for extensions and disposition of requests

Number of requests where an extension was taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
48	0	45	0	0	0	3	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		101-500 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

## Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
8	4	2	0	14

## 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

Personal Information Banks	Active	Created	Terminated	Modified
	44	0	0	0

## 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	\$1,601,361
Overtime	\$11,446
Goods and Services	\$58,375
• Professional services contracts	\$0
• Other	\$58,375
<b>Total</b>	<b>\$1,671,182</b>

## 11.2 Human Resources

<b>Resources</b>	<b>Person Years Dedicated to Privacy Activities</b>
Full-time employees	22.000
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.190
<b>Total</b>	<b>22.190</b>

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