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Introduction

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.

The *Privacy Act* operates to protect the personal information of Canadians that is 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.

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.

Our report on the administration of the *Privacy Act* provides a summary of our activities and performance during the period from April 1, 2021, to March 31, 2022, and includes an interpretation and explanation of the performance data found in our statistical reports to the Treasury Board of Canada Secretariat (TBS).

The report has been prepared and tabled in Parliament in accordance with s. 72 of the *Privacy Act*.

The report for the Office of the Veterans Ombudsman on their administration of the *Privacy Act* is attached to this report as Annex A.

About Veterans Affairs Canada

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

The <u>Department of Veterans Affairs Act</u> 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.

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

The Veterans Affairs Portfolio consists of:

- 1. the Department of Veterans Affairs, which reports to the Minister of Veterans Affairs;
- 2. the <u>Veterans Review and Appeal Board</u>¹, which reports to Parliament through the Minister of Veterans Affairs; and
- 3. 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 <u>Deputy Minister of Veterans Affairs Canada</u>.

¹ A separate report on the administration of the *Privacy Act* is tabled by the Veterans Review and Appeal Board.



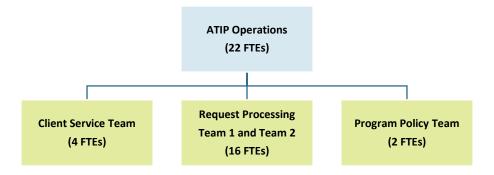
The Access to Information and Privacy Office

The Access to Information and Privacy (ATIP) Office is part of the Chief Financial Officer and Corporate Services Branch. This branch is responsible for supporting the Department in meeting Government of Canada requirements in areas such as financial stewardship, corporate reporting and key accountabilities. Privacy and Information Management is within this branch and is where VAC's ATIP Office is found.

The ATIP Office administers both the *Access to Information Act* and the *Privacy Act*, and is located in Charlottetown, Prince Edward Island. The Director of Privacy and Information Management is the head of the Office, and also serves as the department's ATIP Coordinator. It consists of 4 units: ATIP Operations (the ATIP Office); Privacy and IM Policy; IM Operations; and IM Projects.

The Privacy and Information Management (IM) Policy unit provides training, guidance, and recommendations on privacy and IM. This unit coordinates privacy impact assessments, privacy breach investigations, complaints from the Office of the Privacy Commissioner and works with all areas of the Department on various initiatives and new programs to ensure privacy and IM considerations are included. (7 FTEs).

The ATIP Operations Unit is responsible for administering the access to information and privacy request program. This team is responsible for processing requests in accordance with the Acts, as well as providing guidance to the branches on all matters related to this function. The ATIP Operations Unit has twenty-two full-time employees and is organized into four teams led by one Manager. These teams are:



The Client Service team receives the ATIP requests from the public, and consultation requests from other government departments. This team liaises with employees to obtain and retrieve documents required to process ATIP requests, is responsible for importing and scanning the retrieved documents and providing the requestor with the release package.

The Request Processing Teams are responsible for processing formal and informal requests for personal information and government information, completing consults with other government departments and third parties, and resolving complaints from oversight bodies, namely the Office of the Information Commissioner and the Office of the Privacy Commissioner. They liaise with the oversight bodies to resolve complaints.

The Program Policy Team provides strategic functional advice, guidance and support (i.e. writing procedure manuals, process maps, forms, letters) for ATIP Operations, VAC management and VAC employees. They also coordinate and review documents for proactive publication, and carry out the ATIP function for order paper questions.

ATIP operational environment, including the impact of Covid-19

The global COVID-19 pandemic transformed the operational environment into one largely dependent on remote work. As a result, during the reporting period, the ATIP Office continued to operate for the most part remotely and were successful in this. We attribute this success to the dedication, resiliency and adaptiveness of our employees and to the commitment and steadfastness of our information technology team. We anticipate a shift to a hybrid model for the workplace as re-occupancy of government offices begins in 2022-23.

Delegation orders

The responsibilities for administering the *Privacy Act* are delegated by the Minister of Veterans Affairs to VAC officials through a delegation order. Treasury Board of Canada Secretariat 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, Administration, and Privacy Division, and the Director of Privacy and Information Management.

Our orders ensure that appropriate administrative authorities have been delegated to the ATIP officials responsible for effectively and efficiently administering the Act. The signed delegation order is included in Annex B of this report.

Policies, Guidelines, Procedures and Initiatives

During the reporting period, we made improvements to our ATIP program, some highlights of these are detailed below. We will continue to improve and update our program in 2022-23 and beyond.

Developing a strategic plan for operations

Veterans, their families, and Canadians are very curious about the work we do at VAC, as such we receive many inquiries about our programs and services. As the sharing arm for the Department, the ATIP Office is responsible for finding and sharing the records that are of interest to these groups. This function is carved out for us in the *Access to Information Act* and the *Privacy Act*. We work within this legislative framework to:

- connect with the branches (who are the creators and keepers of departmental records) to retrieve all relevant records;
- review the records for sensitivities in accordance with the Acts; and
- share the records with those who have requested them.

Ensuring seamless access to records is a priority for our office because the public's right of access is a foundational pillar on which public trust and confidence are built. In order to provide seamless access we need to be able to:

- conduct an accurate and complete search of all government records in all formats (e.g. by
 ensuring capacity to search and pull relevant records from all software and systems archived
 and current);
- deliver relevant records on time for processing by the ATIP Office;
- have the tools and guidance available to facilitate the work of the ATIP Officers; and
- have access to improved technology to gain efficiencies in processing the records.

We have focused our attention this past year on looking for ways to gain efficiencies in the aforementioned domains, and to pivot to processes and practices that allow for better ways to do our work. We believe that an organized and strategic approach to enhancing our services is what is needed to deliver the best service possible. That is why we began work on a multi-year strategy to chart the course for improving, enhancing and modernizing our internal and external ATIP services.

We recognize that improving and enhancing our access to the information and privacy system is also vital for ensuring our ability and capacity to provide on-going services despite difficult times, such as the COVID-19 pandemic.

This strategic planning work will continue in 2022-23.

Building connections with the ATIP Professionals Community

The remote operational environment of COVID-19 created unprecedented opportunities for government-wide collaboration thanks to the implementation of new IT systems, such as Microsoft Teams. The new IT platforms removed geographical barriers to collaboration as virtual meetings became

commonplace. This gave government institutions an equal opportunity to participate, especially for those offices located in the regions.

During the reporting period, we were able to participate in TBS-led community of practice meetings with ease and equal opportunity since geographical limitations and cost barriers no longer existed for us. Being able to regularly participate in such meetings meant that we had more, and better, opportunities to connect with other functional specialists and practitioners in the Government of Canada. This virtual community building environment has been transformative to our work in that we now have been able to:

- participate in current and on-going community discussions, such as the *Privacy Act* Modernization and the Access to Information Review;
- have the ability and opportunity to attend regular community of practice meetings led by TBS (i.e. being able to see the presentations, the speakers and have the ability to engage and ask questions);
- learn from the experiences of other government institutions about their modernization initiatives and innovative practices; and
- be kept up to date on initiatives and changes impacting the ATIP community as a whole.

We have been able to learn from other government institutions who have pivoted and modernized elements of their programs, such as Immigration, Refugees and Citizenship Canada, Canada Revenue Agency and the Royal Canadian Mounted Police. By learning from others, we have been able to better define our own challenges and isolate areas for improvement in our ATIP program.

It is our view that government-wide collaboration seems stronger and easier than ever. And learning from one another has never been more important given the growth and changes in the world of access to information and privacy.

We believe that these connections allow for a more cohesive and united community where the exchange of practices, ideas and advancements and accomplishments benefit the whole ATIP community and the public who rely on us to meet their information needs. We look forward to fostering, maintaining and furthering these connections as hybrid models of work become more mainstream.

Applying an "ATIP-by-design" lens to departmental initiatives

We are working to increase awareness in our Department surrounding the need for, and importance of, applying an ATIP lens to program design work. This means we identify the business requirements of ATIP (e.g. retrieval of records from business systems) in the design of new departmental programs, initiatives and business systems. It is important to identify the requirements at the front end in order to reduce, and possibly eliminate risks, and ensure that the most appropriate mitigation measures and strategies are put in place before implementation. An example of why an ATIP lens is critical can be seen in VAC's use of business system repositories for storing client information. A critical ATIP consideration and design element for a repository is the ability for the Department to extract information from it. This

functionality is a critical design element because the Department must be able to extract information when responding to access to information and privacy requests.

Additionally, 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 completed 30 "Privacy, Information Management and Information Technology Security Needs Determination Reports" on various initiatives. Although there was a decrease in the number of needs determinations, we saw an increase in their complexity, largely due to the nature of the initiatives proposed, such as automation, automated decision-making, and artificial intelligence.

Expanding our guidance tools for processing ATIP requests

In the last reporting period, we created a new team called the Program Policy Team whose role was, and is, to develop procedures and guidance documents to support the ATIP Operations teams. During this reporting period, the team completed work on a number of documents, including:

- guidance material on applying section 19 and 23 of the Access to Information Act, and for processing records related to government contracts;
- digitizing the process for responding to informal access requests;
- procedure manuals for the Request Processing Teams; and
- guidance for ATIP employees on how to process requests for information about labour relations files.

We will continue to build on this work in 2022-23 by focusing on more comprehensive tools for VAC employees to increase awareness about access to information and privacy at VAC.

Enhancing our services to internal clients

The ATIP Office provides services to internal clients, such as Human Resources. We review documents for sensitivities based on the intent of the Act.

During the reporting period, we had 63 instances in which internal clients consulted the ATIP Office to review documents for sensitivities. The nature of these documents included such as things as identifying concerns related to personal information. In total we reviewed, 4,475 pages.

We also provided guidance to the branches on best practices for sharing information with VAC clients, and worked with other government institutions to support their respective program needs and requirements.

Training and Awareness

We provided awareness training to 249 departmental staff during the reporting period. This included training in privacy awareness and a general overview and understanding of access to information and privacy. We continue to adapt and update our content to meet the needs of departmental staff as well as to ensure the information is accurate and up to date. Details about the training sessions we delivered during the reporting period are as follows:

Privacy 101 Sessions

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 2021-22, sessions were delivered to various groups including new employees onboarding to the department, nurses, program managers, and contractors.

Details: 194 Participants in 7 Sessions (5 English sessions and 2 French session)

ATIP 101 Training

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.

Details: 55 Participants in 2 English sessions

Monitoring and Compliance

Our practice has been to produce monthly reports to monitor our performance on the administration of the Act. These reports include data on timeliness for the retrieval of records, total number of cases, number of closed cases, and pages disclosed. To improve on this practice, we redesigned our reporting structure to now include quarterly reports to senior management, and we implemented a new dashboard. This new dashboard allows for the fulsome view of key operational data that has both an internal interface for the ATIP Office and an external interface for VAC senior management.

The internal dashboard interface provides the ATIP Coordinator, ATIP manager and team leaders with workload management data (e.g. number of pages processed by Officer, number of requests in review, etc....) which allows them to more accurately track and review the status of requests. As such, they are able to better monitor deadlines, allocate resources and escalate outstanding retrievals – all key components of effective workload management. It was thanks to the data available through the dashboard that were able to reduce processing times and prevent delays by allocating resources for a second reviewer.

The purpose of the external interface is to ensure that VAC senior management are up to date on the status of retrievals and the overall progress of processing requests. Key trends and items of note are highlighted to senior management on a quarterly basis through the Department's governance committees.

In addition to developing and implementing a new dashboard, we also created a new position for reporting and data management. This new role has now brought capacity to ATIP Operations by generating more timely and complex data, monitoring and identifying trends, capturing accurate

historical data, performing quality control evaluations and reviewing critical performance measures from year to year.

All of this work is being done to help improve completion times and meet legislative requirements.

Interpretation and Explanation of Annex C – 2021-22 Statistical Report on the *Privacy Act*

The Request Processing team is responsible for processing requests for personal information. This team has one team leader, two reviewers, and Processing Officers who process formal and informal requests for personal information. What follows is an overview of key data on our Department's performance for 2021-22, as reflected in our statistical report to TBS, 2021-22 Statistical Report on the *Privacy Act* (attached as Annex C).

The following table provides an overview of the privacy requests we processed during the reporting period.

Type of request	Total requests closed during the reporting period	Total pages processed	Total pages disclosed
Privacy – formal	1,742	439,405	437,099
Privacy – informal	155	20,388	17,441
Total	1,897	459,793	454,540

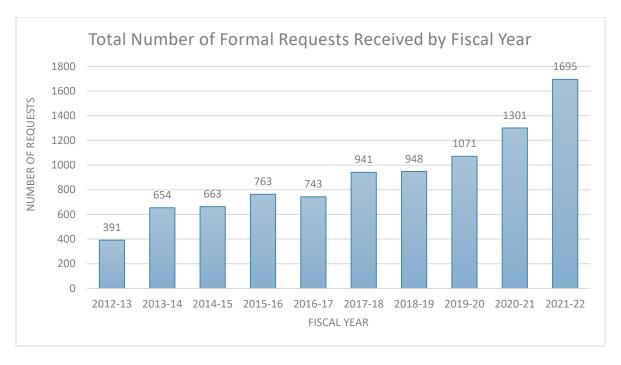
Formal Requests

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.

The following table provides a historical view of key data on the formal privacy requests we have processed.

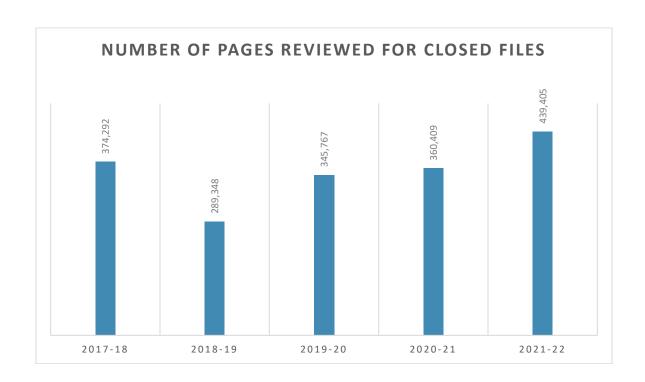
Fiscal year	Number of requests received	Number of requests carried over from the previous	Total caseload	Number of closed requests	Number of pages reviewed for closed files	Number of pages disclosed	Number of requests carried over to the next FY
2021-22	1695	196	1891	1742	439,405	437,099	149
2020-21	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, 2021, and March 31, 2022, the Department received 1695 formal requests for information under the *Privacy Act*, which represents an increase of 30% from 2020-2021 when VAC received 1301 requests. The number of requests we receive each year has been steadily increasing over time as demonstrated in the chart below. We note the most significant increase occurring during this reporting period.



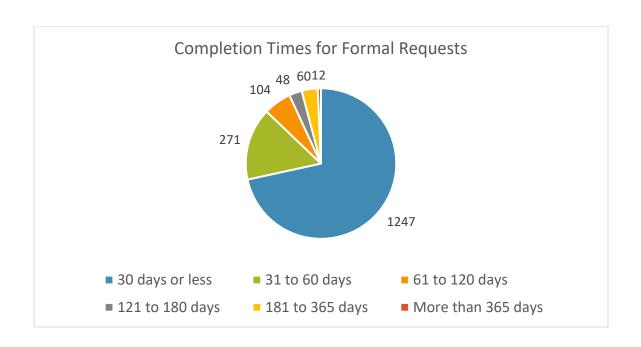
With the 1695 requests received, and the 196 requests carried forward from previous reporting periods (193 from 2020-21, 2 from 2019-20, and 1 from 2018-19), we had 1891 requests to complete. We closed 1742 of these requests during the reporting period, which included completing the 2018-19 request and the two 2019-20 requests. We carried forward 149 (43 were within the legislated timeline, and 106 were beyond the legislated timeline) into the 2022-23 reporting year. And only one of the requests carried forward was from a previous reporting period, specifically 2020-21.

We also note a significant increase in the number of pages processed this year - 439,405 pages - compared to last year in which we processed 360,409 pages, as shown in the chart below.



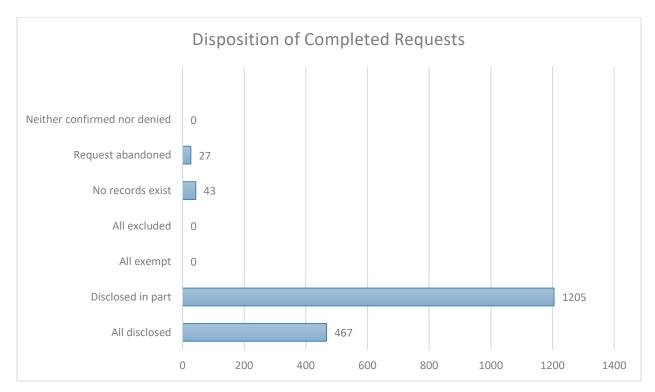
Completion times

We completed 1308 requests (75.1%) within the legislated timeline, which is an improvement from last year in which our completion rate was 65.3%. We had 434 requests that were closed past the legislated timeline. The reasons for the past due requests included interference with operations/workload (227), external consultation (2), internal consultation (1) and other (204). The following chart shows the number of completed requests broken down by completion times



Disposition of requests

Of the 1742 closed requests, 96% of the records were disclosed (467 were disclosed in full (27%) and 1205 were disclosed in part (69%)). The following chart shows the breakdown of the disposition of completed requests.



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Channel of requests

During this reporting period, we received 1695 requests, of which 1095 were submitted by email, 456 were submitted online, 108 were by mail, 24 were by fax, and 12 were by phone.

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 1228 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 1209 exemptions under section 26 in 2021-2022.

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.

Format of information released

Of the formal requests processed, 898 were released as electronic copies, 793 were released in paper format, and one audio record was released.

Extensions

During the reporting period, we received 142 requests requiring extensions. The majority of requests, 133, required a review of a large volume of pages, 8 involved records that were difficult to obtain, and 1 was for an external consultation. 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.

Public Interest Disclosures/Disclosure under subsections 8(2) and 8(5)

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent.

VAC had 5 disclosures of personal information pursuant to paragraph 8(2)(e), during the 2021-22 reporting period.

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. There were no disclosures under 8(2)(m).

Requests for correction of personal information 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 formal requests for corrections and notations of personal information collected by VAC during the reporting period.

Complaints and investigations notices received

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.

The Privacy and IM Policy and Governance Unit received 3 OPC complaints during the 2021-22 fiscal year (all related to use and disclosure). Two are on-going and the third was closed as "not well-founded". As of March 31, 2022, there were also 2 on-going complaints (one for use and disclosure; one for compliance) from 2020-21.

VAC received 10 new complaints on the privacy requests we processed. Of these 10 new complaints, we closed 6 complaints (1 was well-founded, 1 was well-founded and resolved, 3 were resolved with no action required, and 1 was not well-founded). Four complaints were carried over into the next fiscal year.

Privacy Impact Assessments and PIBs

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. Theses 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 2021–2022 fiscal year, VAC submitted three Privacy Impact Assessment (PIA) Addendums to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS). The following programs and activities were assessed:

Departmental Print and Mail

In 2021, the Departmental Print and Mail PIA was amended to provide information in relation to the provider of VAC's Departmental Printing and Mailing services. These services were previously being delivered by Shared Services Canada (SSC) and, as of March 22, 2021, are now being delivered by Public Service and Procurement Canada (PSPC). No updates to VAC's Personal Information Banks were required as a result of this addendum.

My VAC Account

In 2011, a My VAC Account (MVA) PIA was first completed and risks and mitigation measures related to the portal were documented. As the online portal has evolved, PIA addendums were completed in 2013 and in 2017.

In 2021, improved functionality of the MVA secure online portal enabled duly authorized Powers of Attorney (POA) to make non-financial changes to an account of a client they represent. Prior to the enhancements, POAs had to speak to a VAC National Call Centre Network representative to action the account of a VAC client they represent. Personal Information Bank Electronic Identity Proving System (VAC PPU 086) was updated accordingly and will be published as part of VAC's 2022 Information About Programs and Information Holdings update.

Health Care Benefits and Services

In 2010, a Health Care Benefits and Services PIA was first completed where risks and mitigation measures were documented. As the health care and benefits evolved to meet the needs of Veterans and their families, PIA addendums were completed in 2012 and in 2015. In 2022, a new addendum analyzed the addition of Mental Health Benefits (MHB) to the Health Care Benefits Program. The new MHB provides coverage for specific mental health care supports while the applicant is awaiting a VAC Disability Benefit decision for the most common service-related mental health conditions.

Personal Information Bank Health Care Benefits and Services (VAC PPU 295) was updated accordingly and will be published as part of VAC's 2022 Information About Programs and Information Holdings update.

In addition to the three PIA Addendums, 30 Privacy, Information Management and Information Technology Security Needs Determination Reports were completed to determine if new or amended programs or projects required a full PIA. No other initiatives were identified as requiring a full PIA or addendum.

Privacy Breaches

A privacy breach involves the Improper or unauthorized collection, use, disclosure, retention and/or disposal of personal information.

During the 2021-2022 fiscal year, we had 3 material privacy breaches reported to TBS, and the OPC. And we had a total of 75 non-material privacy breaches.

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 OPC and TBS. VAC's practice is consistent with other government institutions and Treasury Board Secretariat guidance.

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 2021-2022. 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 \$1,842,379 to administer the *Privacy Act* during the reporting period, of which \$1,789,668 was spent on salaries, \$50,560 for other administrative costs, and \$2,151 on overtime costs were incurred in 2021-2022.

The costs identified above for administering the *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.

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, which is what we did in 2021-22, and will continue to do in 2022-23. Our focus, and commitment, will continue to be to:

- provide the best possible service to our clients;
- build public trust through accurate and relevant searches of records;
- be nimble and innovative in how we work to ensure continuous and seamless services (even in difficult times);
- leverage digital technology to gain efficiencies; and
- support the Government of Canada's commitment to be open and transparent with Canadians.

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

Annex A – Office of the Veterans Ombudsman

Annual Report on the Administration of the Privacy Act

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, 2021 to March 31, 2022. This report is being prepared to be 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 – Veterans Intervention Services 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 – Veterans Intervention Services 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 - Veterans Intervention Services, 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 2021-22 reporting period, which represents 0.26 of an 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 2021-22 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 2021-22 reporting period, OVO received no complaints in relation to privacy requests. No complaints were carried over from 2021-22. 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 – Veterans Intervention Services.

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.

Office of the Veterans Ombudsman Statistical Report on the *Privacy Act*

*	Government of Canada	Gouvernement du Canada

Statistical Report on the Privacy Act

Name of institution:	Office of the Veterans Ombud					
Reporting period:	2021/04/01	to	2022/03/31			

Section 1: Requests Under the Privacy Act

1.1 Number of requests received

		Number of Requests
Received during reporting period		6
Outstanding from previous reporting periods	0	
 Outstanding from previous reporting period 	0	
 Outstanding from more than one reporting period 	0	
Total		6
Closed during reporting period		6
Carried over to next reporting period		0
Carried over within legislated timeline	0	
 Carried over beyond legislated timeline 	0	

1.2 Channels of requests

Source	Number of Requests
Online	6
E-mail	0
Mail	0
In person	0
Phone	0
Fax	
Total	6

Section 2: Informal requests

2.1 Number of informal requests

**		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods	377	0
Outstanding from previous reporting period	0	
 Outstanding from more than one reporting period 	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period		0

2.2 Channels of informal requests

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

2.3 Completion time of informal requests

I	Completion Time								
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days		More Than 365 Days	Total	
ĺ	0	0	0	0	0	0	0	0	

2.4 Pages released informally

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

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

		Completion Time						
Disposition of Requests	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	1	4	0	0	0	0	0	5
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	1	0	0	0	0	0	0	1
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	2	4	0	0	0	0	0	6

3.2 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	3
19(1)(f)	0	22.1	0	27	1
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		-

3.3 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

3.4 Format of information released

		Electronic			
Paper	E-record	Data set	Video	Audio	Other
0	5	0	0	0	0

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
646	646	5

3.5.2 Relevant pages processed by request disposition for \underline{paper} and $\underline{e\text{-record}}$ formats by size of requests

	Less Th Pages Pr		100- Pages Pr		501-1 Pages Pro		1001- Pages Pr			han 5000 rocessed
Disposition	Number of Requests	Pages Processed								
All disclosed	2	114	3	532	0	0	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
Total	2	114	3	532	0	0	0	0	0	0

3.5.3 Relevant minutes processed and disclosed for audio formats

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

3.5.4 Relevant minutes processed per request disposition for \underline{audio} formats by size of requests

	Less than 60 Minutes	processed	60-120 Minutes pr	20 Minutes processed More than 120 Minutes processed		rocessed
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

3.5.5 Relevant minutes processed and disclosed for $\underline{\text{video}}$ formats

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

3.5.6 Relevant minutes processed per request disposition for $\underline{\text{video}}$ formats by size of requests

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

3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	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
Total	0	0	0	0	0

3.6 Closed requests

3.6.1 Number of 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

	Principal Reason				
Number of requests closed past the legislated timelines	operations / Workload	External Consultation	Internal Consultation	Other	
0	0	0	0	0	

3.7.2 Request closed beyond legislated timelines (including any extension taken)

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

3.8 Requests for translation

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

Section 4: Disclosures Under Subsections 8(2) and 8(5)

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

Section 5: Requests for Correction of Personal Information and Notations

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

Section 6: Extensions

6.1 Reasons for extensions

	15(a)(i) Interference with operations 15 (a)(ii) Co						ation	
	Further review							15(b)
	required to				Cabinet			Translation
Number of requests where an	determine	Large volume of	Large volume of	Documents are	ConfidenceSection			purposes or
extension was taken	exemptions	pages	requests	difficult to obtain	(Section 70)	External	Internal	conversion
0	0	0	0	0	0	0	0	0

6.2 Length of extensions

		15(a)(i) Interferenc	e with operations		15 (a)(ii) Consultation			
	Further review							15(b)
	required to				Cabinet			Translation
	determine	Large volume of	Large volume of	Documents are	ConfidenceSection			purposes or
Length of Extensions	exemptions	pages	requests	difficult to obtain	(Section 70)	External	Internal	conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

Section 7: Consultations Received From Other Institutions and Organizations

7.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

	Nu	Number of Days Required to Complete Consultation Requests									
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total			
Disclose entirely	0	0	0	0	0	0	0	0			
Disclose in part	0	0	0	0	0	0	0	0			
Exempt entirely	0	0	0	0	0	0	0	0			
Exclude entirely	0	0	0	0	0	0	0	0			
Consult other institution	0	0	0	0	0	0	0	0			
Other	0	0	0	0	0	0	0	0			
Total	0	0	0	0	0	0	0	0			

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

	N	lumber of	days requi	red to co	mplete co	nsultation	request	s
							More	
		l		61 to		181 to	Than	
	1 to 15	16 to 30	31 to 60	120	121 to	365	365	
Recommendation	Days	Days	Days	Days	180 Days	Days	Days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

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

8.2 Requests with Privy Council Office

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

Section 9: Complaints and Investigations Notices Received

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

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	0	0	0
Central	0	0	0	0
Total	0	0	0	0

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

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

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	0

Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount	
Salaries		\$19,240	
Overtime		\$0	
Goods and Services		\$0	
Professional services contracts	\$0		
Other	\$0		
Total		\$19,240	

12.2 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
Total	0.260

Note: Enter values to three decimal places.

Annex B - Delegation Order



Anciens Combattants Canada

Privacy Act Delegation Order

Loi sur la protection des renseignements personnels Ordonnance de délégation

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 cijointe 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 Ordonnance de délégation.

Cette désignation remplace tous les arrêtés de délégation antérieurs.

The Minister of Veterans Affairs Canada Ministre, Anciens Combattants Canada

Laurence M Teday

Lawrence MacAulay Minister of Veterans Affairs Ministère des Anciens Combattants

Signed in Ottawa, Ontario, Canada this 25th day of March, 2021 Signé à Ottawa, Ontario, Canada ce 25° jour de mars 2021



Privacy Act and Regulations - Delegated Authorities

The Minister of Veterans Affairs, pursuant to section 73 of the *Privacy Act* (the Act), delegates to the persons holding the positions set out in the following schedule, or the persons occupying on an acting basis those positions, the exercise of the powers, duties and functions of the Minister, as the head of Veterans Affairs Canada, under the provisions of the *Act* and *Privacy Regulations* as set out in the following schedule. 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)

Description	Section	Delegated Authority
Disclosure for research or	8(2)(j)	Deputy Minister
statistical purposes		Associate Deputy Minister
		Assistant Deputy Ministers
		Directors General
		Director, Privacy and Information
		Management
		Manager, Access to Information and Privacy
		Team Leader, Access to Information and Privacy
		Manager, Safety and Security Services
		 Manager, Litigation Coordination Unit
		 Case Manager, Field Operations
		Division
Disabature in the public interest	0/2)/==)	Donate Minister
Disclosure in the public interest or in the interest of the individual	8(2)(m)	Deputy Minister Associate Deputy Minister
of in the interest of the individual		Associate Deputy Minister Assistant Deputy Minister, Corporate
		Services
		Director General, Information
		Technology, Information Management
		and Administration
		Director, Privacy and Information
		Management
Retention of a record of requests	8(4)	Deputy Minister
and disclosed records to		Associate Deputy Minister
investigative bodies under section 8(2)(e) of the <i>Privacy Act</i>		Assistant Deputy Minister, Corporate Services
		Director General, Information
		Technology, Information Management and Administration

		Director, Privacy and Information
		Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Notice of disclosure under paragraph 8(2)(m)	8(5)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Record of disclosures to be retained	9(1)	Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Directors General Director, Privacy and Information Management
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)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy
Personal information to be included in personal information banks	10	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

		Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Notice where access requested	14(a)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Giving access to the record	14(b)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy Officer, Access to Information and Privacy
Extension of the 30 day time limit to respond to a privacy request	15	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

		Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy Officer, Access to Information and Privacy
Decision on whether to translate a response to a privacy request in one of the two official languages	17(2)(b)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy Officer, Access to Information and Privacy
Decision on whether to convert personal information to an alternate format	17(3)(b)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy
Decision to refuse to disclose personal information contained in an exempt bank	18(2)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

		Manager, Access to Information and Privacy
Personal information obtained in confidence	19	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information that may be injurious to federal-provincial affairs	20	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information that may be injurious to international affairs or the defence of Canada or one of its allies	21	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy

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	22	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information created for the <i>Public Servants Disclosure Protection Act</i>	22.3	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Refuse to disclose personal information prepared by an investigative body for security clearance	23	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
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	24	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration

under sentence if the conditions in the section are met		Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information which could threaten the safety of individuals	25	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information about another individual and shall refuse to disclose such information where disclosure is prohibited under section 8	26	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information that is subject to solicitor-client privilege	27	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

		Manager, Access to Information and Privacy
		Team Leader, Access to Information and Privacy
Refuse to disclose personal	28	Deputy Minister
information relating to the individual's physical or mental		Associate Deputy Minister Assistant Deputy Minister, Corporate
health where the disclosure is		Services
contrary to the best interests of		Director General, Information
the individual		Technology, Information Management and Administration
		 Director, Privacy and Information Management
		Manager, Access to Information and Privacy
		Team Leader, Access to Information and Privacy
Receive notice of investigation	31	Deputy Minister
by the Privacy Commissioner		Associate Deputy Minister
		Assistant Deputy Minister, Corporate Services
		Director General, Information
		Technology, Information Management and Administration
		Director, Privacy and Information Management
		Manager, Access to Information and Privacy
		Team Leader, Access to Information and Privacy
Right to make representations to	33(2)	Deputy Minister
the Privacy Commissioner during		Associate Deputy Minister
an investigation		Assistant Deputy Minister, Corporate Services
		Director General, Information
		Technology, Information Management and Administration
		Director, Privacy and Information
		Management
		Manager, Access to Information and Privacy

		Team Leader, Access to Information and Privacy
Receive Privacy Commissioner's report of findings of an investigation and give notice of action taken	35(1)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Provision of addition personal information to a complainant after receiving a 35(1)(b) notice	35(4)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Receive Privacy Commissioner's report of findings of investigation of exempt bank	36(3)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy

Receive report of Privacy Commissioner's findings after compliance investigation	37(3)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Request that a court hearing, undertaken with respect to certain sections of the Act, be held in the National Capital Region	51(2)(b)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Request and be given right to make representations in section 51 hearings	51(3)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Prepare annual report to Parliament	72(1)	Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

Privacy Regulations - Delegated Authorities

Description	Section	Delegated authority
Retention of personal information requested under paragraph 8(2)(e)	7	Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Allow examination of the documents (Reading Room)	9	 Deputy Minister Associate Deputy Ministers Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Notification concerning corrections	11(2),(4)	Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy
Correction refused, notation placed on file	11(4)	 Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

		Manager, Access to Information and Privacy
Disclosure to a medical practitioner or psychologist	13(1)	Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Examination in presence of medical practitioner or psychologist	14	 Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

Office of the Veterans Ombudsman

The following portion of the Delegation Order applies to records and information that are created, collected, maintained, used and disclosed by the Office of the Veterans Ombudsman.

Position	Privacy Act	Privacy Regulations
Veterans Ombudsman	Full delegation	Full delegation
Director General of	Full delegation	Full delegation
Operation		
Legal Advisor	Full delegation	Full delegation
Director of Corporate	Full delegation	Full delegation
Services and		
Charlottetown Operations		

Annex C – Statistical Report

Government Gouvernement du Canada

Statistical Report on the Privacy Act

Name of institution:	Veterans Affairs Canada

Reporting period: 2021/04/01 to 2022/03/31

Section 1: Requests Under the Privacy Act

1.1 Number of requests received

		Number of Requests
Received during reporting period		1695
Outstanding from previous reporting periods		196
 Outstanding from previous reporting period 	193	
 Outstanding from more than one reporting period 	3	
Total		1891
Closed during reporting period		1742
Carried over to next reporting period		149
 Carried over within legislated timeline 	43	
 Carried over beyond legislated timeline 	106	

1.2 Channels of requests

Source	Number of Requests	
Online	456	
E-mail	1095	
Mail	108	
In person	0	
Phone	12	
Fax	24	
Total	1695	

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		129
Outstanding from previous reporting periods		74
 Outstanding from previous reporting period 	74	
 Outstanding from more than one reporting period 	0	
Total		203
Closed during reporting period		155
Carried over to next reporting period		48

2.2 Channels of informal requests

Source	Number of Requests
Online	42
E-mail	62
Mail	24
In person	0
Phone	0
Fax	1
Total	129

2.3 Completion time of informal requests

	Completion Time										
1 to 15 Days	16 to 30 Daya	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Daya	Total				
38	11	23	34	18	18	13	155				

2.4 Pages released informally

Less Than 100		100-	500	501-1	1000	1001-5000		More Than 5000	
Pages R	eleased	Pages Released		Pages R	eleased	Pages Released		Pages Re	eleased
Number of Requests		Number of Requests				Number of Requests			
121	2022	24	5346	4	2546	6	7527	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

		Completion Time _							
Disposition of Requests	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total	
All disclosed	191	204	61	10	0	0	1	467	
Disclosed in part	316	480	201	91	47	59	11	1205	
All exempted	0	0	0	0	0	0	0	0	
All excluded	0	0	0	0	0	0	0	0	
No records exist	17	14	9	3	0	0	0	43	
Request abandoned	19	6	0	0	1	1	0	27	
Neither confirmed nor denied	0	0	0	0	0	0	0	0	
Total	543	704	271	104	48	60	12	1742	

3.2 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)	4	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	1209
19(1)(f)	0	22.1	0	27	9
20	0	22.2	0	27.1	0
21	0	22.3	0	28	6
	•	22.4	0		•

3.3 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

3.4 Format of information released

		Electronic					
Paper	E-record Data set Video Audio				Other		
793	898	0	0	1	0		

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for $\underline{\mathsf{paper}}$ and $\underline{\mathsf{e-record}}$ formats

	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
ľ	439405	437099	1699

3.5.2 Relevant pages processed by request disposition for \underline{paper} and $\underline{e\text{-record}}$ formats by size of requests

	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
Disposition	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	439	7488	22	4384	5	3746	1	1478	0	0
Disclosed in part	754	23516	243	51670	81	60490	125	264434	2	17306
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	23	30	1	136	2	1290	1	3437	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	1216	31034	266	56190	88	65526	127	269349	2	17306

3.5.3 Relevant minutes processed and disclosed for <u>audio</u> formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
57	57	1

3.5.4 Relevant minutes processed per request disposition for <u>audio</u> formats by size of requests

	Less than 60 Minutes	processed	60-120 Minutes pr	rocessed	More than 120 Minutes processed		
Disposition	Number of requests Minutes Processed		essed Number of requests Minutes Processed		Number of requests	Minutes Processed	
All disclosed	1	57	0	0	0	0	
Disclosed in part	0	0	0	0	0	0	
All exempted	0	0	0	0	0	0	
All excluded	0	0	0	0	0	0	
Request abandoned	0	0	0	0	0	0	
Neither confirmed nor denied	0	0	0	0	0	0	
Total	1	57	0	0	0	0	

3.5.5 Relevant minutes processed and disclosed for video formats

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

3.5.6 Relevant minutes processed per request disposition for <u>video</u> formats by size of requests

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

3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	3	0	0	0	3
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	3	0	0	0	3

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	1308
Percentage of requests closed within legislated timelines (%)	75.08610792

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

	Principal Reason				
Number of requests closed past the	Interference with				
legislated timelines	operations /	External	Internal		
	Workload	Consultation	Consultation	Other	
434	227	2	1	204	

3.7.2 Request closed beyond legislated timelines (including any extension taken)

Number of days past legislated timelines	Number of requests past legislated timeline where no extension was taken	Number of requests past legislated timeline where an extension was taken	Total
1 to 15 days	141	24	165
16 to 30 days	76	10	86
31 to 60 days	38	6	44
61 to 120 days	34	19	53
121 to 180 days	23	14	37
181 to 365 days	26	16	42
More than 365 days	6	1	7
Total	344	90	434

3.8 Requests for translation

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

Section 4: Disclosures Under Subsections 8(2) and 8(5)

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

Section 5: Requests for Correction of Personal Information and Notations

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

Section 6: Extensions

6.1 Reasons for extensions

	1	15(a)(i) Interferenc	e with operations	15 (a)(ii) Consultation				
	Further review							15(b)
	required to				Cabinet			Translation
Number of requests where an	determine	Large volume of	Large volume of	Documents are	ConfidenceSection			purposes or
extension was taken	exemptions	pages	requests	difficult to obtain	(Section 70)	External	Internal	conversion
142	0	133	0	8	0	1	0	0

6.2 Length of extensions

	15(a)(i) Interference with operations				15 (a)(ii) Consultation			
	Further review	Further review						15(b)
	required to				Cabinet			Translation
	determine	Large volume of	Large volume of	Documents are	ConfidenceSection			purposes or
Length of Extensions	exemptions	pages	requests	difficult to obtain	(Section 70)	External	Internal	conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	133	0	8	0	1	0	0
31 days or greater								0
Total	0	133	0	8	0	1	0	0

Section 7: Consultations Received From Other Institutions and Organizations

7.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

	Nu	ımber of [ays Requi	red to Co	omplete Co	nsultatio	n Reques	ts
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

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

	N	umber of	days requi	ired to co	mplete cor	nsultation	request	5
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

	Fewer TI Pages Pr			100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	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 385	0	0	0	0	0	0	0	0	0	0	
More than 365	0	0	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	0	0	

8.2 Requests with Privy Council Office

	Fewer TI Pages Pr			100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	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 385	0	0	0	0	0	0	0	0	0	0	
More than 365	0	0	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	0	0	

Section 9: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
10	2	2	0	14

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	3

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	44	0	0	2
Central	0	0	0	0
Total	44	0	0	2

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

Number of material privacy breaches reported to TBS	3
Number of material privacy breaches reported to OPC	3

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches 75
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Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures	Amount	
Salaries	\$1,789,668	
Overtime	\$2,151	
Goods and Services	\$50,560	
 Professional services contracts 	\$0	
Other	\$50,560	
Total		\$1,842,379

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	22.798
Part-time and casual employees	0.895
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.975
Total	24.668

Note: Enter values to three decimal places.