

April 2019-March 2020



Privacy Annual Report 2019-20

Contents

- 1. Introduction3
- 2. Mandate3
- 3. Canada Post and the Privacy Act3
- 4. Organizational Structure4
- 5. Delegation of Authority6
- 6. Privacy Program.....6
 - Successes and challenges6
- 7. Requests7
 - 7.1 Number7
 - 7.2 Origin8
 - 7.3 Consultations8
 - 7.4 Personal information banks8
 - 7.5 Processing performance9
 - 7.6 Exemptions9
- 8. Section 8 Disclosures9
- 9. Monitoring Privacy Access Requests10
- 10. Complaints11
 - 10.1 Number and type11
 - 10.2 Disposition of complaints11
- 11. Training and Awareness.....11
- 12. Policies and Guidelines12
- 13. Summary of Material Privacy Breaches.....12
- 14. Privacy Impact Assessments and Risk Assessments13
- 15. Conclusion13
- Appendix A – Delegation of Authority14
- Appendix B – Canada Post Corporation Wholly Owned Subsidiaries19
- Appendix C – Treasury Board Secretariat Statistical Report20

1. Introduction

The *Privacy Act* (the Act) governs the management and the accountability of information practices with respect to personal information held by federal institutions including Canada Post Corporation (Canada Post or the Corporation). The Act applies to the personal information these institutions collect, use and disclose about individuals or employees, and it gives Canadians the right to access their personal information held by government institutions. The Act also requires that organizations protect that information against unauthorized collection, use and disclosure.

Canada Post is pleased to submit to Parliament its Annual Report related to the administration of the *Privacy Act*, prepared in accordance with section 73.

Canada Post's financial year aligns with the calendar year. As required by the Treasury Board Secretariat of Canada, this report covers the period from April 1, 2019, to March 31, 2020.

2. Mandate

The Canada Post Group of Companies, which includes Canada Post and its subsidiaries – Purolator Holdings Ltd., SCI Group Inc. and Innovapost Inc. – employed nearly 68,000 people in 2019, and of that number, more than 53,000 were full-time and part-time employees of Canada Post. The Group of Companies delivered almost 7.9 billion pieces of mail, parcels and messages in 2019 to 16.5 million addresses across Canada. Canada Post operates the largest retail network in Canada with almost 6,100 retail post offices. It has a mandate to provide a standard of postal services that meets the needs of Canadians in a secure and financially self-sustaining manner.

With digital communication and online bill payment prevalent among Canadian households and businesses, Lettermail™ volumes have declined steadily and significantly for more than a decade. Canada Post delivered 2.5 billion (48%) fewer pieces of mail in 2019 than in the peak year of 2006.

Canada Post has evolved and transformed its business so that it continues to play a key role in the delivery of Canadians' online purchases. In 2019, for the first time in history, revenue from Canada Post's Parcels line of business surpassed revenue from Transaction Mail. At \$2.7 billion, Parcels revenue generated 41% of the Canada Post segment's revenue in 2019, compared to only 21% in 2011.

3. Canada Post and the Privacy Act

Every day, Canada Post comes into contact with vast amounts of personal information of Canadians across the country. Canada Post's employees, customers and the public trust the Corporation to properly handle and protect this information and respect its obligations under the *Privacy Act*. Canada Post has consistently demonstrated strong compliance with the *Privacy Act* and continues to evolve its privacy practices to incorporate national and international best practices as well as guidance from its regulators.

™ Trademark of Canada Post Corporation.

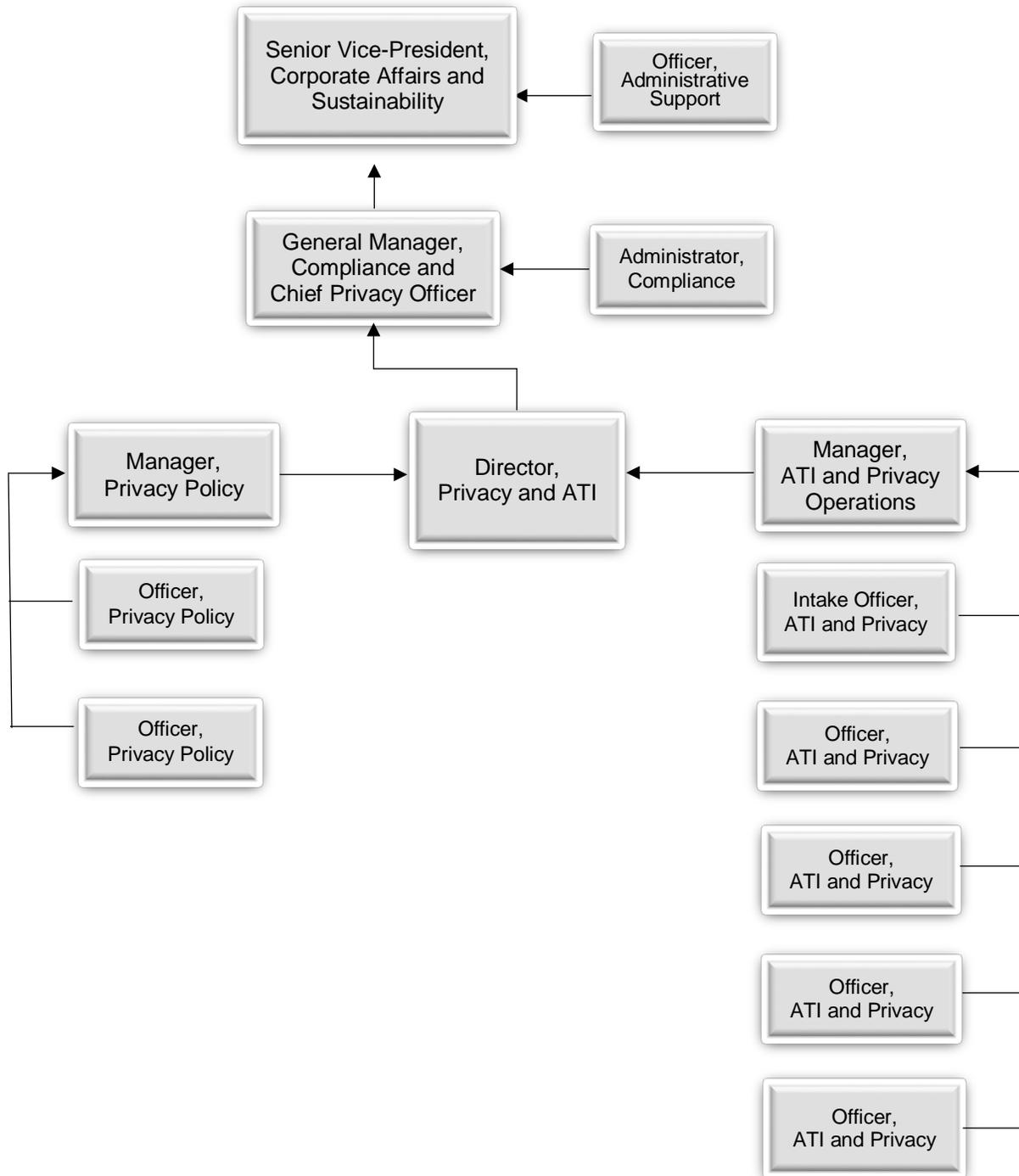
This commitment to privacy plays a critical role in Canada Post's ability to achieve its business objectives and maintain the high level of trust Canadians have in the Canada Post brand. Privacy is considered proactively and privacy principles are built into the design and development of products and services including the use of innovative technologies.

4. Organizational Structure

The Privacy Office is a part of the Compliance team within the Corporate Affairs and Sustainability portfolio. It is responsible for the administration of the *Privacy Act* and the operational accountability for the program.

During the 2019-20 reporting period, the team comprised two privacy officers reporting to the Manager of Privacy Policy. The Manager reports to the Director of Access to Information and Privacy, who in turn reports to the General Manager of Compliance and Chief Privacy Officer. The Director acts as the Access to Information and Privacy Coordinator and point of contact for the Corporation in liaising with the Treasury Board Secretariat of Canada, the Office of the Privacy Commissioner of Canada and other government and private institutions for privacy matters.

The chart below outlines our organizational structure as of March 31, 2020.



5. Delegation of Authority

In 2019-20, the delegation order, pursuant to section 73 of the *Privacy Act*, was reviewed to address changes to senior executive roles and responsibilities. In May 2020, the delegation order was revised to reflect these changes. The President and CEO's authority has been delegated for the Corporation to meet key legislative requirements, while enabling efficiencies and managing risk at the appropriate levels in the Corporation. As required by the Treasury Board Secretariat of Canada, the delegation order is included in Appendix A.

6. Privacy Program

Successes and challenges

The Privacy Office acts as a centre of excellence for privacy, data protection and anti-spam matters across the Corporation. It works closely with the lines of business and functional areas to ensure a proactive approach to privacy during the design and development of products and services and in the implementation of projects.

In 2019-20, one of the key initiatives for the Privacy Office was collaboration with the relevant areas of business to develop and implement the Global Preferences project intended to improve customer experience and further empower Canadians to express their preferences in the handling of their personal information by Canada Post. During the reporting period, the work focused on developing requirements and procuring a solution to help Canada Post manage cookies and other tracking preferences of its website visitors. In addition, the Privacy Office provided advice to its marketing and market research functions on the requirements under Canadian anti-spam legislation (CASL) in the context of their outreach activities.

In 2019-20, the first phase of a new public-facing online privacy centre was launched. It represented a major step toward implementing a multi-year privacy policy renewal project, which seeks to modernize Canada Post's privacy practices to better align with the evolution of the e-commerce marketplace, enhanced data analytics and new digital marketing techniques. During this first phase, a comprehensive online privacy policy was developed to increase the transparency of Canada Post's personal information handling practices. In addition to covering online and offline privacy practices of the Corporation, this policy explains these practices in a more user-friendly way and enables consumers to express their privacy preferences for products and services offered by Canada Post. The second phase of the privacy centre will be launched in 2020-21.

The Privacy Office provides advice and leadership to the Corporation on all matters respecting privacy. In 2019-20, key advice was provided in the following areas:

- applicability of the General Data Protection Regulation (GDPR) to Canada Post:
 - contracting with GDPR-exposed customers;
- innovative postal services:
 - digitizing some aspects of the mail delivery;
 - providing best-in-class delivery experience;

- direct marketing and privacy regimes in Canada and around the globe, including the United States and the European Union:
 - leveraging geo-location data for marketing;
- information sharing practices:
 - sharing employee personal information with bargaining agents;
 - sharing customer personal information with third parties, including municipal, provincial and federal authorities;
- ownership and control of personal information:
 - third-party service providers administering personal information of Canada Post employees;
- identification and prevention of data breaches:
 - collaborating with the security and cybersecurity functions to ensure the identification and remediation of vulnerabilities.

Privacy risk assessments were completed for two initiatives:

- Canada Post's employee-facing and customer-facing video surveillance practices,
- partnership with specific third-party consumer data aggregators in the context of the Canada Post Smartmail Marketing™ business.

In 2019-20, there continued to be a high number of access requests under the *Privacy Act* with large volumes of records in many files. In addition, the increased demand for privacy advice on complex files and collaborations on cross-functional business teams presented resource challenges at times.

As a result of COVID-19, Canada Post was deemed an essential service, which resulted in adjustments and changes to its operations. The Privacy Office provided critical advice with respect to operational changes to the business, occupational health and safety, and human resource issues. The volume of requests for advice, the complexity of the issues as well as the frequent urgency of some matters presented challenges to the team during this time.

7. Requests

7.1 Number

The right of individuals to access and correct their personal information held in Canada Post's personal information banks is included in Canada Post's Customer Privacy Policy and at **canadapost.ca**.

In 2019-20, Canada Post received 986 access requests under the *Privacy Act*, a significant increase from the previous year.

™ Trademark of Canada Post Corporation.

7.2 Origin

In 2019-20, most regions saw the number of requests increase, most notably at the head office, while Atlantic and Huron-Rideau regions experienced the most significant decrease.

Office	2017-18	2018-19	2019-20
Head office	53	55	170
Atlantic	47	44	41
Quebec	66	42	64
Greater Toronto Area (GTA)	300	316	360
Huron-Rideau	91	104	77
Prairies	71	69	72
Pacific	185	179	202
Total	813	809	986

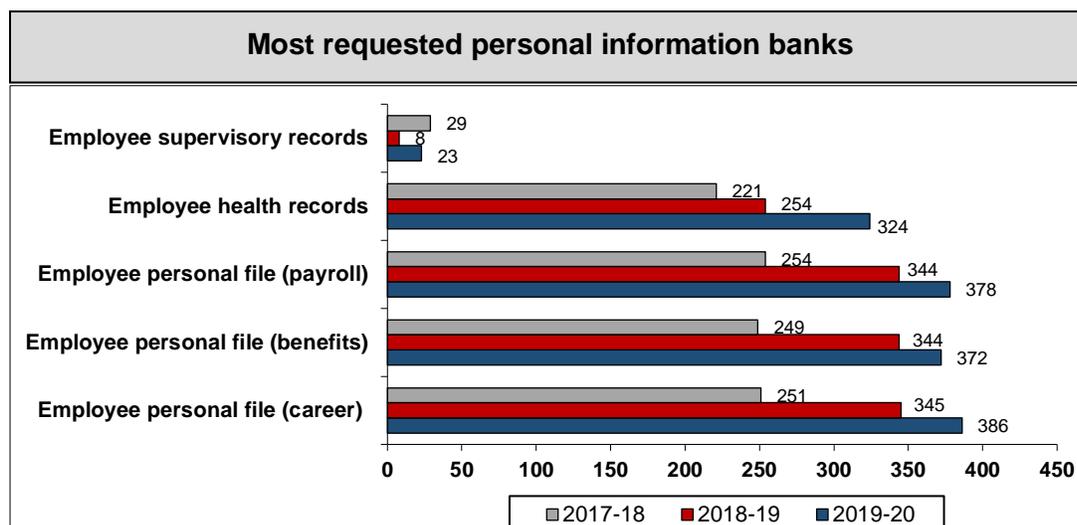
7.3 Consultations

In 2019-20, one privacy consultation was received and closed from a Government of Canada institution.

7.4 Personal information banks

In 2019-20, no new personal information banks were created, terminated or modified. The most requested information was from the following personal information banks:

- employee personal file (career)
- employee personal file (benefits)
- employee personal file (payroll)
- employee health records
- employee supervisory records



7.5 Processing performance

A total of 956 requests were closed in 2019-20, compared to 909 requests closed in 2018-19 and 764 in 2017-18, indicating a clear upward trend.

In 2019-20, 85 requests were carried over from the previous reporting period, compared to 106 requests carried over to 2018-19 and 59 carried over to 2017-18.

Of the formal requests processed in 2019-20, 97.8% were completed on time, which increased from 94.6% in 2018-19, and 95.6% in 2017-18.

7.6 Exemptions

The majority of exemptions invoked fell under two sections of the Act:

- section 26, which protects personal information about another individual, was used in 160 access requests; and
- section 22(1)(b), which addresses law enforcement and investigations, was used in 30 access requests.

In 2019-20, no exclusions were invoked.

8. Section 8 Disclosures

The *Privacy Act* allows for the disclosure of personal information without consent to federal investigative bodies listed in the regulations in accordance with section 8(2)(e) of the *Privacy Act*. Canada Post’s Privacy Office conducted a complete review of each request and approved disclosures. In 2019-20, the number of such disclosures increased significantly from previous reporting years.

Canada Post did not make any disclosures pursuant to section 8(2)(m) of the *Privacy Act* in 2019-20.

<i>Privacy Act</i> Section 8(2)(e)	Disclosures in 2017-18	Disclosures in 2018-19	Disclosures in 2019-20
	144	164	227

9. Monitoring Privacy Access Requests

To strengthen accountability and assist Canada Post in meeting its legislative requirements, the Privacy Office developed a variety of measures to monitor and evaluate the performance of responding to access requests.

Canada Post used Amanda7 software by Calytera (formerly CSDC Systems) to manage all requests received under the Act. The software has a functionality that allows the Manager of Access to Information and Privacy to monitor the status and time taken to process *Privacy Act* access requests. In addition, the following measures were undertaken:

- monitored monthly scorecards to measure the following criteria against objectives set for the year:
 - percentage of active privacy requests on time;
 - percentage of privacy requests completed on time;
- distributed a monthly scorecard to the General Manager of Compliance and Chief Privacy Officer;
- provided regular briefings on key files to senior executives and the Board of Directors;
- regularly monitored access request processing for quality with a focus on the following:
 - timeliness of input and processing;
 - appropriateness of exemptions;
 - consistency of redaction.

In the reporting period from March 15 to 31, 2020, during which working conditions were affected by COVID-19, Canada Post continued to respond to all requests. Since Canada Post was deemed an essential service for Canadians, it was imperative that the Corporation focus on critical operational priorities to fulfil its mandate. Although the ATI Directorate and Privacy Office were able to remain fully functional, there were operational pressures that limited the ability to retrieve and review records. This resulted in delays and necessitated the use of section 15 of the Act to seek extensions for several files.

A secure electronic portal was set up (through the epost Connect™ service) as the request process shifted to an electronic record disclosure process with some ad hoc paper requests.

™ Trademark of Canada Post Corporation.

10. Complaints

10.1 Number and type

In 2019-20, the Office of the Privacy Commissioner of Canada (OPC) forwarded four privacy complaints to Canada Post. One complaint concerned the processing of access requests, and three complaints related to the use and disclosure of personal information.

10.2 Disposition of complaints

During this reporting period, Canada Post closed five complaints: two related to the processing of access requests and three related to the collection, use and disclosure of personal information. The OPC found one complaint related to the processing of access requests and one complaint related to the collection, use and disclosure of personal information well founded. The remaining three complaints were considered not well founded.

11. Training and Awareness

The Privacy Office is committed to raising awareness and building knowledge of privacy throughout the Corporation. In 2019-20, the following training and awareness initiatives took place:

- All new employees were required to take the privacy e-learning training module developed by the Privacy Office.
- Targeted training was delivered to key internal groups that were considered high risk due to the amount and sensitivity of the employee or customer information they manage. Those in the Corporation who received training in 2019-20 were the Access HR, Digital and Marketing groups.
- In November 2019, the Privacy Office held its second annual in-house privacy conference, hosting 150 attendees. The conference featured some of Canada's leading privacy experts from major customers including Rogers, IBM and Sunlife and senior business leaders from Canada Post and Innovapost. Discussions revolved around current and emerging issues in privacy, such as building and maintaining customer trust in a rapidly evolving digital landscape. Panels of internal business partners discussed issues of privacy in the workplace and privacy and ethical considerations and the use of innovative technologies in the development of products and services. Every year, the conference attracts a growing number of attendees from various internal functions and lines of business, and it serves as a key awareness and education initiative.
- Corporate Compliance facilitated a cross-functional workshop with policy stakeholders (the teams that handle most of the customer personal information under Canada Post's control) to identify potential risks to customer privacy policy compliance and assess mitigation measures in their respective areas of the business. The result of this exercise will inform Canada Post's privacy policy review and awareness and training initiatives in 2020.
- The Chief Privacy Officer delivered a privacy presentation to 450 members of the Sales team at its annual conference. The focus was on trends in customer privacy, regulatory reform and changing customer expectations.

12. Policies and Guidelines

The Privacy Office continued to work on a multi-year privacy policy renewal project that will update the program to keep pace with the evolution of Canada Post's business, meeting customer expectations and focusing on the digital and e-commerce marketplace. In the reporting period, the Privacy Office launched the online privacy centre. The externally facing privacy policy was updated and presented in a user-friendly and more transparent way allowing customers to have better access to the policy, clearly understand how their personal information is handled and express their privacy preferences. In 2020, the online privacy centre will be expanded and the internal, employee-facing privacy policies will be reviewed and updated.

The Privacy Office provided the Corporation with privacy guidelines in several key areas:

- working from home in support of its new Flexible Work Arrangement Practice;
- use of geo-location data in the development of products and services;
- draft guidelines of the Privacy Breach Management Practice;
- information sharing of employee information with bargaining agents.

13. Summary of Material Privacy Breaches

In 2019-20, an issue related to **canadapost.ca** account holders' login credentials previously compromised in other third-party external data breaches was brought to the attention of Canada Post. Although it was not considered Canada Post's breach, it had the potential for having a material impact on the privacy interests of some of its customers. Therefore, it was reported to the Office of the Privacy Commissioner of Canada and the Treasury Board Secretariat of Canada. Corrective measures were implemented that included notifying the affected account holders and offering free credit monitoring for one year. In addition, Canada Post forced a password reset across its entire universe of customer email addresses. An additional configuration change was also introduced to increase the complexity requirements for the passwords.

As a result of this incident, the dormant account policy was updated. The Website Registration Data Retention Practice was updated to clarify Canada Post's right to unilaterally delete inactive accounts (with no activity within two years) along with the contents of the accounts. In 2020, there will be a planned activity to purge dormant accounts.

14. Privacy Impact Assessments and Risk Assessments

Canada Post conducts risk assessments and formal privacy impact assessments to identify and mitigate risks to privacy interests, which may be present in new or existing corporate programs or initiatives. The Privacy Office also participates in the agile program management process providing risk assessments and advice through the development of Canada Post products and services.

Privacy risk assessments were completed for the following initiatives:

- Canada Post's employee-facing and customer-facing video surveillance practices;
- partnership with specific third-party consumer data aggregators in the context of the Canada Post Smartmail Marketing™ business.

15. Conclusion

Canada Post continues to transform its business in a highly competitive environment to respond to the changing needs of the business and its customers. This will call for increasingly complex business models, greater use of new technologies to deliver services through digital and physical channels, and business strategies based on the use of employee and customer data. Canada Post's privacy program and team of experts are well positioned to continue to meet the expectations of increased transparency and accountability that come from customers, Canadians and regulators, while assisting the Corporation in achieving its business goals.

Appendix A – Delegation of Authority

CANADA POST CORPORATION

DELEGATION ORDER

The President and Chief Executive Officer of the Canada Post Corporation, Doug Ettinger, on this 25th day of May 2020, pursuant to section 73(1) of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto to exercise the powers and perform the duties and functions of the President and Chief Executive Officer, the Head of the Institution, for the purposes of the *Privacy Act* as set out hereto in the schedule below.

Delegation of Powers, Duties or Functions

Pursuant to section 73(1) of the *Privacy Act*

Delegation Order							
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
8(2)(j)	May disclose PI for research purposes	X	X	X		X	
8(2)(m)	May disclose PI in the public interest or in the interest of the individual	X	X	X	X		
8(4)	To retain copies of requests received under 8(2)(e)	X	X	X	X	X	
8(5)	To notify the Privacy Commissioner of disclosures under 8(2)(m)	X	X	X	X		
9(1)	To retain record of PI use/disclosures not included in InfoSource	X	X	X	X	X	
9(4)	Shall notify OPC of disclosure of use consistent with Consistent uses	X	X	X	X	X	
10	Shall cause PI to be included in personal information banks	X	X	X	X	X	

Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
14	Notice where access requested: Shall notify applicant within 30 days after receipt of request whether access is to be given or not and to provide access to PI May extend time limits and notify applicant	X	X	X	X	X	
15	May extend time limits and notify applicant	X	X	X	X	X	
17(2)(b)	Language of access: to determine the necessity for translation	X	X	X	X	X	
17(3)(b)	May provide access to personal information in alternative format	X	X	X	X	X	

Exemption Provisions of the Privacy Act

Section	Power, Duties or Functions	Delegation Order						
		Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy	
18(2)	Exemption (exempt bank) – May refuse disclosure of any PI contained in a personal information bank	X	X	X	X			
19(1)	Exemption – To refuse disclosure of PI obtained in confidence from other governments	X	X	X	X			
19(2)	Exemption – May disclose PI where authorized to disclose	X	X	X	X			
20	Exemption – May refuse disclosure of PI where it could be injurious to Federal-provincial relations	X	X	X	X			

Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
21	Exemption – May refuse disclosure of PI where it could be injurious to conduct of international affairs and defence	X	X	X	X		
22 ⁽¹⁾⁽²⁾	Exemption – Law enforcement and investigation: (1) May refuse to disclose PI in course of investigations (2) To refuse to disclose PI compiled by RCMP where GoC has refused to release	X	X	X	X		
22.3	Exemption – Public Servants Disclosure Protection Act	X	X	X	X		
23	Exemption – May refuse to disclose PI that could reveal the identity of a confidential security clearance source	X	X	X	X		
24	Exemption – May refuse to disclose PI re individuals sentenced for an offence	X	X	X	X		
25	Exemption – May refuse to disclose PI if it threatens the safety of individuals	X	X	X	X		
26	Exemption – May refuse to disclose PI about another individual and shall refuse to disclose PI under section 8	X	X	X	X		
27 ¹	Exemption – May refuse to disclose PI subject to Solicitor-client privilege	X	X	X	X		
28 ²	Exemption – May refuse to disclose PI relating to health of individual where contrary to best interests	X	X	X	X		

¹ In consultation with Legal
² In consultation with a qualified medical professional

Other Provisions of the Privacy Act

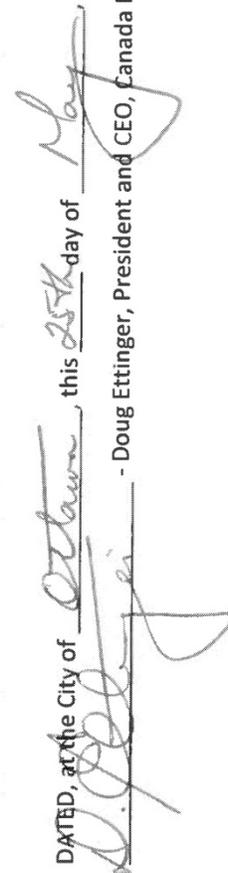
Delegation Order							
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
31	Notice of intention to investigate by the Office of the Privacy Commissioner	X	X	X	X		
33(2)	Right to make representations: May make representations to the Commissioner	X	X	X	X		
35(1)(2)	Findings and recommendations of Privacy Commissioner (complaints received and notice given to Commissioner of any action or proposed action to be taken on recommendations)	X	X	X	X		
35(4)	May notify the Commissioner that access to be given	X	X	X	X		
36(3)	Review of Exempt Banks: Report of findings and recommendations (exempt banks)	X	X	X	X		
37(3)	Review of Compliance with sections 4 to 8: Report of findings and recommendations by Privacy Commissioner	X	X	X	X		
51(2)(b)	May request special rules for hearings	X	X	X	X		
51(3)	May request Ex parte representations	X	X	X	X		
72(1)	Shall prepare an Annual Report to Parliament	X	X	X			

**Delegation of Powers, Duties or Functions
Pursuant to the Privacy Act Regulations**

		Delegation Order						
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy	
9	To provide reasonable facilities and time provided to examine personal information	X	X	X	X	X		
11(2)	To provide notification that correction to personal information has been made	X	X	X	X	X		
11(4)	To provide notification that correction to personal information has been refused	X	X	X	X	X		
13(1)	Disclosure of personal information relating physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requester	X	X	X	X			
14	Disclosure of personal information relating to physical or mental health may be made to a requester in the presence of a qualified medical practitioner or psychologist	X	X	X	X			

The Director, Access to Information and Privacy is also authorized to make decisions under sections 8(1) and 8(2)(c) to (i), (k) and (l) of the *Privacy Act*.

The Director, Access to Information and Privacy, the Manager, Access to Information and Privacy, and the Manager, Privacy Policy are authorized to designate in writing a member of their staff to act on their behalf in case of absence or unavailability.

DATED, at the City of Ottawa, this 25th day of May, 2020
 - Doug Ettinger, President and CEO, Canada Post Corporation

Appendix B – Canada Post Corporation Wholly Owned Subsidiaries

1. Introduction

The information contained in this report relates to the administration of the *Privacy Act* at the following wholly owned subsidiaries of the Corporation from April 1, 2019, to March 31, 2020.

2. Activities

2.1 2875039 Canada Limited

As a holding company, 2875039 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875039 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in Purolator Holdings Ltd.

2.2 2875047 Canada Limited

As a holding company, 2875047 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875047 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation. It is currently inactive.

2.3 3906949 Canada Inc.

As a holding company, 3906949 Canada Inc. does not employ staff, but elects a director who is also the president and secretary of the company.

3906949 Canada Inc. was incorporated on June 15, 2001, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in SCI Group Inc.

Appendix C – Treasury Board Secretariat Statistical Report



Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: CANADA POST CORPORATION

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

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	986
Outstanding from previous reporting period	85
Total	1071
Closed during reporting period	956
Carried over to next reporting period	115

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	47	101	96	93	35	1	2	375
Disclosed in part	27	114	201	72	4	0	0	418
All exempted	0	0	0	1	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	11	8	13	4	7	0	0	43
Request abandoned	73	23	19	3	1	0	0	119
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	158	246	329	173	47	1	2	956

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	1	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)	30	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	160
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
793	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
133586	120636	913

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	365	3285	9	1788	1	542	0	0	0	0
Disclosed in part	140	5770	193	48478	73	47326	12	13447	0	0
All exempted	1	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	119	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	625	9055	202	50266	74	47868	12	13447	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	418	0	418
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	418	0	418

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	935
Percentage of requests closed within legislated timelines (%)	97.8

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
21	21	0	0	0

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	7	6	13
16 to 30 days	4	0	4
31 to 60 days	0	3	3
61 to 120 days	0	1	1
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	11	10	21

2.8 Requests for translation

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

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
227	0	0	227

Section 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	1
Requests for correction accepted	0
Total	1

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	
117	12	29	71	2	0	0	3	0

5.2 Length of extensions

Length of Extensions	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	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	12	29	71	2	0	0	3	0
31 days or greater								0
Total	12	29	71	2	0	0	3	0

Section 6: Consultations Received From Other Institutions and Organizations

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

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	1	12	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	1	12	0	0
Closed during the reporting period	1	12	0	0
Carried over to the next reporting period	0	0	0	0

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	1	0	0	0	0	0	0	1
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	1	0	0	0	0	0	0	1

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

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

7.2 Requests with Privy Council Office

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

Section 8: Complaints and Investigations Notices Received

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

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

9.1 Privacy Impact Assessments

Number of PIA(s) completed	0
----------------------------	---

9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	51	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		\$513,548
Overtime		\$0
Goods and Services		\$63,554
• Professional services contracts	\$41,832	
• Other	\$21,722	
Total		\$577,102

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	6.55
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.65
Students	0.00
Total	7.20

Note: Enter values to two decimal places.

2019-20 Supplemental Statistical Report – Requests Affected by COVID-19 Measures

Supplemental Statistical Report on the Access to Information Act

The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 1 – Requests received

	Number of requests
Received from 2019-04-01 to 2020-03-13	69
Received from 2020-03-14 to 2020-03-31	4
Total	73

The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 2 – Requests closed

	Number of requests closed within the legislated timelines	Number of requests closed past the legislated timelines
Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting periods	72	5
Received from 2020-03-14 to 2020-03-31	4	0
Total	76	5

The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 3 – Requests carried over

	Number of requests
Requests received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	14
Requests received from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	1
Total	15

Supplemental Statistical Report on the Privacy Act

The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 4 – Requests received

	Number of requests
Received from 2019-04-01 to 2020-03-13	954
Received from 2020-03-14 to 2020-03-31	32
Total	986

The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 5 – Requests closed

	Number of requests closed within the legislated timelines	Number of requests closed past the legislated timelines
Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting periods	929	20
Received from 2020-03-14 to 2020-03-31	6	1
Total	935	21

The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 6 – Requests carried over

	Number of requests
Requests from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	109
Requests from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	6
Total	115