



Information
Commissioner
of Canada

Commissaire
à l'information
du Canada



Annual Report on the Administration of the PRIVACY ACT

2011-2012

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1 Introduction

This report to Parliament describes the activities of the Office of the Information Commissioner of Canada (OIC) for 2011–2012 under the *Privacy Act*.¹ It was prepared and is being tabled pursuant to section 72 of the Act.

The purpose of the *Privacy Act* is to safeguard the privacy of individuals by protecting personal information about them held by federal institutions, and to provide individuals with a right of access to that information.

The OIC is an independent public body set up in 1983 under the *Access to Information Act*. Our mission is to conduct efficient, fair and confidential investigations into complaints about federal institutions' handling of access to information requests. The goal of our work is to maximize compliance with the Act while fostering disclosure of public sector information. The Commissioner uses the full range of tools, activities and powers at her disposal—from information and mediation to persuasion and litigation, when required.

The OIC became subject to the Act in 2007. Since then, we have made every effort to provide exemplary service to requesters. We have also reported annually to Parliament on the administration of our privacy program. Here are some highlights from 2011–2012:

- We completed formal requests in an average of 15.8 days.
- No complaints were filed against us about our administration of the *Privacy Act* during 2011–2012.

2 Organization

The Information Commissioner of Canada is an Agent of Parliament and ombudsperson appointed by Parliament under the *Access to Information Act*. The Commissioner is supported by the OIC. The OIC has three branches, as follows:

- The **Complaints Resolution and Compliance Branch** investigates individual complaints about the processing of access requests, conducts dispute resolution activities and makes formal recommendations to institutions, as required. It also assesses federal institutions' compliance with their obligations under the *Access to Information Act* and carries out systemic investigations and analysis.
- **Legal Services** represents the Commissioner in court and provides legal advice on investigations, legislative issues and administrative matters. It closely monitors the range of cases having a potential impact on our mandate and on access to information in general. Legal Services also assists investigators by providing them with up-to-date and customized reference tools on the evolving technicalities of the case law.
- **Corporate Services** provides strategic and corporate leadership in planning and reporting, communications, human resources and financial management, security and administrative services, internal audit, as well as information

¹ *Privacy Act*, R.S., 1985, c. P-21

management and technology. It conducts external relations with a wide range of stakeholders, notably Parliament, government and representatives of the media. It is also responsible for managing our access to information and privacy function.

The **Access to Information and Privacy (ATIP) Secretariat** processes all requests filed under the *Privacy Act* for records under the control of the OIC. The ATIP Secretariat had two staff members in 2011–2012:

- The Director, ATIP Secretariat, is responsible for the management of the Secretariat, including overseeing request administration, policy development and training. The Director holds full delegated authority under the Act as ATIP Coordinator.
- The ATIP Officer is responsible for processing requests and holds some delegated authority, for extension of time limits and arranging translation of requested records, when required.

3 Delegation order

Under the *Privacy Act*, the Information Commissioner is the designated head of the institution, for the purpose of administering the legislation.

At the start of the reporting period, the delegation order the Commissioner signed in September 2010 was in effect (see Appendix A). This order gave full authority for decisions under the Act to the Interim Assistant Commissioner, Policy, Communications and Operations, and to the Director, Information Management.

On April 21, 2011, the Commissioner revoked the authority delegated to the Interim Assistant Commissioner (see Appendix B) and to the Director, Information Management (see Appendix C). A new delegation order was put in place to reflect organizational changes. That order gives full authority to the Director General, Corporate Services, and to the Director, ATIP Secretariat (see Appendix D).

On the July 16, 2011, the Commissioner modified this delegation order to give limited authority to the ATIP Officer (see Appendix E).

4 Interpretation of the statistical report

The OIC's statistical report details all aspects of the processing of privacy requests received by the ATIP Secretariat from April 1, 2011, to March 31, 2012 (see Appendix F).

4.1 Requests received under the Privacy Act

We received five requests under the *Privacy Act* in 2011–2012, one fewer than in the previous reporting period. We completed all of these requests before March 31, 2012. As well, we processed one consultation request from another institution.

4.2 Disposition of requests completed

Of the five requests we completed, we disclosed all the requested information in one case. For three requests, we determined that no records existed. The final request was abandoned by the applicant.

4.3 Exemptions

We invoked no exemptions under the *Privacy Act* in 2011–2012.

4.4 Completion times

We completed all five requests under the *Privacy Act* within 30 days. The average turnaround time was 15.8 days. We completed the one consultation request within 15 days of receipt.

4.5 Method of access

We released the records associated with the one request for which we had records on CD-ROM.

4.6 Costs

Category of cost	Amount
Salary	\$7,620
Administration (operations and management)	\$121
Total	\$7,741
Person-years	0.3

Costs incurred during the reporting period are calculated based on the salaries of ATIP Secretariat members and expenses associated with the administration of the Act.

5 Privacy Impact Assessments

The OIC neither initiated nor completed any Privacy Impact Assessments in 2011–2012. These assessments are required when an organization changes the purposes for which it gathers personal information or gathers new information.

6 Public interest disclosures

The OIC made no disclosures of information under paragraph 8(2)(m) of the *Privacy Act* during the reporting period. These disclosures are made when the Commissioner decides that releasing the information clearly outweighs any invasion of privacy of the person to whom the records relate or when releasing the information would benefit the person in question.

7 Changes to the organization, programs, operations or policies

During 2011–2012, the ATIP Secretariat was separated from the OIC's IM/IT Division and now reports directly to the Director General, Corporate Services. This has streamlined the approval process and facilitated the timely processing of requests.

Throughout the year, we continued to revise and refine our ATIP Procedures Manual. This document provides a detailed look at the steps required to process a privacy request.

After successfully implementing our new electronic records management system in the spring of 2011, we began work to renew the legal case management system. We also began to modernize the architecture behind our networks and continued to enhance the security of our systems to protect the sensitive information we collect from institutions. We expect each of these measures to have a positive impact on our ability to retrieve records and respond to requests.

8 Education and training

During 2011–2012, the ATIP Secretariat conducted individual training sessions, in both official languages, on the *Access to Information Act* and the *Privacy Act*, and related processes. A total of 5 of our approximately 100 employees took this training in 2011–2012.

9 Complaints

No complaints against us were lodged with the Office of the Privacy Commissioner (OPC) during the reporting period. Three were carried over from the previous fiscal year and closed in 2011–2012.

Of these three, one was closed as Resolved and one was Well-founded/Resolved. Both of these were the result of administrative errors on our part. The final complaint was settled during the course of the investigation.

We were advised of one privacy breach during the year, in which we inadvertently sent a document associated with an investigation, and containing personal information about the complainant, to the wrong institution. Upon learning of this breach, we immediately reported it to the OPC. We are awaiting a response from the OPC on the matter.



Office of the
Information
Commissioner
of Canada

Appendix A

Commissariat
à l'information
du Canada

112 Kent Street
Ottawa, Ontario
K1A 1H3
Tel.: 613-995-2410
Fax: 613-947-7294
1-800-267-0441

112, rue Kent
Ottawa (Ontario)
K1A 1H3
Tél.: 613-995-2410
Télééc.: 613-947-7294
1-800-267-0441

**Delegation orders for the purpose of the *Access to Information Act* and the *Privacy Act*
Arrêté de déléation en vertu de la *Loi sur l'accès à l'information*
et de la *Loi sur la protection des renseignements personnels***

The Information Commissioner of Canada, pursuant to Section 73 of the *Access to Information Act* and of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Information Commissioner of Canada as the head of a government institution that is, the Office of the Information Commissioner of Canada.

En vertu de l'article 73 de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*, la Commissaire à l'information du Canada délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire les dits postes, les attributions dont elle est investie en qualité de responsable d'une institution fédérale, c'est-à-dire le Commissariat à l'information du Canada.

Schedule / Annexe

Position/ Poste

***Privacy Act and Regulations/
Loi sur la protection des
renseignements personnels et
règlement.***

***Access to Information Act and
Regulations/
Loi sur l'accès à l'information et
règlement.***

Layla Michaud
Interim Assistant Information
Commissioner (Policy,
Communications and Operations) /
Commissaire adjoint à l'information
par intérim (Politiques,
communications et opérations)

Full Authority/
Autorité Absolue

Full Authority/
Autorité Absolue

Director, Information Management/
Directeur, Gestion de l'information

Full Authority/
Autorité Absolue

Full Authority/
Autorité Absolue

Dated, at the City of Ottawa,
this 22 day of September 2010

Daté, à la ville d'Ottawa
ce 22 jour de Septembre 2010

Suzanne Legault
Information Commissioner of Canada
Commissaire à l'information du Canada



Information
Commissioner
of Canada

Commissaire
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Ottawa, Ontario
K1A 1H3
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Fax: 613-947-7294
1-800-267-0441

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K1A 1H3
Tél.: 613-995-2410
Télééc.: 613-947-7294
1-800-267-0441

Appendix B

Delegation Order for the purpose of the *Access to Information Act* and the *Privacy Act*

Arrêté sur la délégation en vertu de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*

The delegation to Layla Michaud, Interim Assistant Information Commissioner, effective September 22, 2010 is revoked.

La délégation à Layla Michaud, Commissaire à l'information adjointe par intérim, du 22 septembre 2010 est révoquée.

This revocation is effective on April 26, 2011.

Cette révocation prend effet le 26 avril 2011.

Dated at Ottawa, this 21st day of April 2011. Signée à Ottawa, le 21 avril 2011.

Suzanne Legault
Information Commissioner of Canada
Commissaire à l'information du Canada



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Appendix C

112 Kent Street
Ottawa, Ontario
K1A 1H3
Tel.: 613-995-2410
Fax: 613-947-7294
1-800-267-0441

112, rue Kent
Ottawa (Ontario)
K1A 1H3
Tél.: 613-995-2410
Télééc.: 613-947-7294
1-800-267-0441

Delegation Order for the purpose of the *Access to Information Act* and the *Privacy Act*

Arrêté sur la délégation en vertu de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*

The delegation to Monica Fuijkschot,
Director, Information Management,
effective September 22, 2010 is revoked.

La délégation à Monica Fuijkschot,
Directeur, Gestion de l'information, du 22
septembre 2011 est révoquée.

This revocation is effective on April 26,
2011.

Cette révocation prend effet le 26 avril
2011.

Dated at Ottawa, this 21st day of April 2011. Signée à Ottawa, le 21 avril 2011.

Suzanne Legault
Information Commissioner of Canada
Commissaire à l'information du Canada



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Appendix D

**Delegation orders for the purpose of the *Access to Information Act* and the *Privacy Act*
Arrêté de déléation en vertu de la *Loi sur l'accès à l'information*
et de la *Loi sur la protection des renseignements personnels***

The Information Commissioner of Canada, pursuant to Section 73 of the *Access to Information Act* and of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Information Commissioner of Canada as the head of a government institution that is, the Office of the Information Commissioner of Canada.

En vertu de l'article 73 de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*, la Commissaire à l'information du Canada délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions dont elle est investie en qualité de responsable d'une institution fédérale, c'est-à-dire le Commissariat à l'information du Canada.

Schedule / Annexe

Position/ Poste

*Privacy Act and Regulations/
Loi sur la protection des
renseignements personnels et
règlement.*

*Access to Information Act and
Regulations/
Loi sur l'accès à l'information et
règlement.*

Director General (Corporate Services) /
Directeur général (Services
organisationnels)

Full Authority/
Autorité Absolue

Full Authority/
Autorité Absolue

Director, ATIP Secretariat/
Directeur, secrétariat de l'AIPRP

Full Authority/
Autorité Absolue

Full Authority/
Autorité Absolue

This delegation order is effective on April 26, 2011

Cet arrêté de déléation prend effet le 26 avril 2011.

Dated, at the City of Ottawa,
this 21 day of April 2011

Daté, à la ville d'Ottawa
ce 21 jour d'avril 2011

Suzanne Legault
Information Commissioner of Canada
Commissaire à l'information du Canada



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Ottawa, Ontario
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**Delegation orders for the purpose of the *Access to Information Act* and the *Privacy Act*
Arrêté de délégation en vertu de la *Loi sur l'accès à l'information*
et de la *Loi sur la protection des renseignements personnels***

The Information Commissioner of Canada, pursuant to Section 73 of the *Access to Information Act* and of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Information Commissioner of Canada as the head of a government institution that is, the Office of the Information Commissioner of Canada. This Delegation Order supersedes all previous Delegation Orders pursuant to section 73.

En vertu de l'article 73 de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*, la Commissaire à l'information du Canada délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions dont elle est investie en qualité de responsable d'une institution fédérale, c'est-à-dire le Commissariat à l'information du Canada. Le présent arrêté de délégation annule et remplace tout arrêté antérieur fait en vertu de l'article 73.

This delegation order is effective on July 18, 2011

Cet arrêté de délégation prend effet le 18 juillet 2011.

Dated, at the City of Ottawa, this 16th day of July 2011

Daté, à la ville d'Ottawa, ce 16^e jour de juillet 2011

Suzanne Legault

Information Commissioner of Canada
Commissaire à l'information du Canada

Schedule / Annexe

Position/ Poste	<i>Privacy Act and Regulations/ Loi sur la protection des renseignements personnels et règlement.</i>	<i>Access to Information Act and Regulations/ Loi sur l'accès à l'information et règlement.</i>
Director General (Corporate Services) / Directeur général (Services organisationnels)	Full Authority/ Autorité Absolue	Full Authority/ Autorité Absolue
Director, ATIP Secretariat/ Directeur, Secrétariat de l'AIPRP	Full Authority/ Autorité Absolue	Full Authority/ Autorité Absolue
ATIP Officer/ Agent de l'AIPRP	Sections of the Act / articles de la Loi: 15, 17(2)(b) Sections of the Regulations / articles du Règlement: 9, 11(2), 11(4), 13(1), 14	Sections of the Act / articles de la Loi: 4(2.1), 8(1), 9, 11(2), 11(3), 11(4), 11(5), 11(6), 12(2), 12(3), 27(1), 27(4), 29(1). Sections of the Regulations / articles du Règlement: 6(1), 7(2), 7(3), 8, 8.1

**Statistical Report on the *Privacy Act***Name of institution: Office of the Information CommissionerReporting period: 2011/04/01 to 2012/03/31**PART 1 – Requests under the *Access to Information Act***

	Number of Requests
Received during reporting period	5
Outstanding from previous reporting period	0
Total	5
Closed during reporting period	5
Carried over to next reporting period	0

PART 2 – Requests closed during the reporting period**2.1 Disposition and completion time**

Disposition of requests	Completion Time							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	
All disclosed	0	1	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
No records exist	2	1	0	0	0	0	0	3
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	1	0	0	0	0	0	0	1
Total	3	2	0	0	0	0	0	5

2.2 Exemptions

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

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

2.4 Format of information released

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

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	7	7	1
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	1

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	
	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed
All disclosed	1	7	0	0	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
Abandoned	1	0	0	0	0	0	0	0	0	0
Total	2	7	0	0	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation required	Legal advice sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Abandoned	0	0	0	0	0
Total	0	0	0	0	0

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

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

2.6.2 Number of days past deadline

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

2.7 Requests for translation

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

PART 3 – Disclosures under subsection 8(2)

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

PART 4 – Requests for correction of personal information and notations

	Number
Requests for correction received	0
Requests for correction accepted	0
Requests for correction refused	0
Notations attached	0

PART 5 – Extensions

5.1 Reasons for extensions and disposition of requests

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

5.2 Length of extensions

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

PART 6 – Consultations received from other institutions and organizations

6.1 Consultations received from other government institutions and organizations

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during reporting period	1	3	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	1	3	0	0
Closed during the reporting period	1	0	0	0
Pending at the end of the reporting period	0	3	0	0

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

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

PART 7 – Completion time of consultations on Cabinet confidences

Number of days	Number of responses received	Number of responses received past deadline
1 to 15	0	0
16 to 30	0	0
31 to 60	0	0
61 to 120	0	0
121 to 180	0	0
181 to 365	0	0
More than 365	0	0
Total	0	0

PART 8 – Resources related to the *Privacy Act*

8.1 Costs

Expenditures		Amount
Salaries		\$7,620
Overtime		\$0
Goods and Services		\$121
• Contracts for privacy impact assessments	\$0	
• Professional services contracts	\$0	
• Other	\$121	
Total		\$7,741

8.2 Human Resources

Resources	Dedicated full-time	Dedicated part-time	Total
Full-time employees	0	1	1
Part-time and casual employees	0	0	0
Regional staff	0	0	0
Consultants and agency personnel	0	0	0
Students	0	0	0
Total	0	1	1

Office of the Information Commissioner

Appendix – A

Additional Reporting Requirements – *Privacy Act*

Institutions are required to indicate the number of:

- Privacy Impact Assessments initiated: 0

We did not initiate any Privacy Impact Assessments during fiscal year 2011-2012.

- Privacy Impact Assessments completed: 0

We did not complete any Privacy Impact Assessments during fiscal year 2011-2012.