



Veterans Affairs
Canada

Anciens Combattants
Canada

Annual Report on the Administration of the *Privacy Act 2015 – 2016*



The Honourable Kent Hehr, PC, MP
Minister of Veterans Affairs
and Associate Minister of National Defence

Canada

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1. Introduction

The [Privacy Act](#) provides members of the public with the legislated right to access and request the correction of their personal information under the control of federal government institutions. The Act also imposes strict obligations related to the collection, accuracy, use, disclosure, retention and disposition of personal information.

Veterans Affairs Canada (VAC) and the Office of the Veterans Ombudsman (OVO) take very seriously the responsibility to protect the privacy and rights of all Veterans and their families.

This annual report on the administration of the *Privacy Act* outlines how VAC and the OVO fulfilled their responsibilities under the *Privacy Act* during the fiscal year beginning April 1, 2015 and ending March 31, 2016.

2. Preparation and Tabling of the Annual Report

In accordance with Section 72 of the *Privacy Act*, the Minister of Veterans Affairs, as head of the institution, is required to prepare an annual report on the administration of the Act and this report is to be tabled in Parliament.

3. Mandate of Veterans Affairs Canada

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

VAC's mandate is set out in the [Department of Veterans Affairs Act](#). It charges the Minister of Veterans Affairs with responsibility for *"...the care, treatment or re-establishment in civil life of any person who served in the Canadian Forces or Merchant Navy or in the naval, army, air forces or merchant navies of Her Majesty, of any person who has otherwise engaged in pursuits relating to war, and of any other person designated . . . and the care of the dependents or survivors of any person referred to..."* VAC is also responsible for keeping alive the achievements and sacrifices of those who served Canada in times of war, military conflict and peace.

Responsibilities

VAC fulfills its mandate by enabling the well-being of Veterans and their families, and by supporting recognition and remembrance of the achievements and sacrifices of those who served Canada in times of war, military conflict and peace.

This is accomplished by:

- providing leadership as a champion of Veterans, and by promoting the strategic alignment and coordination of benefits and services; whether available through the

Department and other federal partners, or through provincial and community programs and non-government organizations;

- the work and research of the Department—listening to the suggestions of Veterans, their representatives, and stakeholders. The Department strives to design and deliver programs that meet the modern needs of Veterans and their families; and,
- helping Veterans access the supports and services they need, from all levels of government and the community. Veterans Affairs Canada aims to be a leader in the care and support for all Veterans and their families.

4. Mandate of the Office of the Veterans Ombudsman

The OVO helps ensure that the sacrifices of Canada's Veterans and their families are recognized through the provision of services, benefits, and support in a fair, accessible, and timely manner. As an impartial and independent officer, the Veterans Ombudsman reports directly to the Minister of Veterans Affairs and works to ensure that Veterans, men and women of the Canadian Armed Forces (CAF), members and former members of the Royal Canadian Mounted Police (RCMP), as well as their families and other individuals that are clients of VAC are treated fairly and in accordance with the [Veterans Bill of Rights](#).

The mandate of the Ombudsman, found in the [Order-in-Council P.C. 2007-530](#), 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 individual 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 stakeholders' access to programs and services by providing them with information and referrals.

5. Organization

I Veterans Affairs Canada Access to Information and Privacy Office

The VAC Access to Information and Privacy (ATIP) Coordinator acts on behalf of the Minister of Veterans Affairs and the Deputy Minister to ensure that the Department's responsibilities under the *Access to Information Act* and the *Privacy Act* are met. The ATIP Coordinator reports directly to the Assistant Deputy Minister, Chief Financial Officer and Corporate Services Branch.

The main activities of VAC's ATIP Office consist of the following:

- Processing requests for information submitted under the *Access to Information Act* and the *Privacy Act*;
- Developing policies, procedures and guidelines in support of Access to Information and Privacy legislation and central agency requirements;
- Promoting awareness of both acts to ensure employees understand their roles and responsibilities;
- Monitoring compliance with both acts and central agency requirements;
- Preparing annual reports to Parliament;
- Coordinating and providing direction to program managers regarding the completion of Privacy Impact Assessments (PIAs);
- Coordinating the resolution of any complaints against VAC which have been submitted to the Information Commissioner under the *Access to Information Act* and to the Privacy Commissioner under the *Privacy Act*;
- Providing centralized management of privacy breaches;
- Providing VAC staff with advice, guidance and training on ATIP issues;
- Providing support and recommendations to the Department's Chief Privacy Officer and the Corporate Management Committee (CMC); and
- Supporting VAC in meeting its commitments to openness and transparency through proactive disclosure of information and the release of information via informal avenues.

Processing of access to information and privacy requests is centralized within the ATIP Office in Charlottetown, Prince Edward Island. The ATIP Office has two sections: Operations and Policy and Governance. In 2015–2016, the VAC ATIP Coordinator's Office employed a total of 25.14 full-time equivalents (FTEs).

In addition, the ATIP Coordinator's Office supports and maintains a network of 26 ATIP Liaison Officers (20 Liaison Officers in the Charlottetown Head Office, five based in Ottawa and one representing the field). The Liaison Officers are responsible for retrieving information from their areas when a request is received, and identifying information which may qualify for an exemption under the acts.

II Office of the Veterans Ombudsman Access to Information and Privacy Unit

The Veterans Ombudsman, Deputy Ombudsman and Executive Director (formerly Director General of Operations in Delegation Order in Annex 1), Legal Advisor, and Director, Corporate Services and Charlottetown Operations have full authority for the OVO to exercise the powers, duties and functions of the Minister as the Head of Veterans Affairs, under the provisions of the *Acts* and related regulations (see Annex 1). Although four positions have been delegated full authority, the Veterans Ombudsman has been identified as the senior-most official within the OVO responsible for Access to Information and Privacy. The Director, Corporate Services and Charlottetown Operations, is responsible for operational management of the Access to Information and Privacy functions within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both *Acts* are met. Processing of requests is centralized within the unit. The unit consists of the Director, Corporate Services and Charlottetown Operations, ATIP Coordinator, and a Liaison Officer. The Legal Advisor is also responsible for the final review and release of information to the Requester. These 4 full-time staff members were assigned to the administration of both *Acts* on a part-time (as required) basis during the 2015–2016 reporting period, which represents 0.10 of a FTE.

The main activities of the OVO ATIP unit include:

- Timely completion of requests for information under the *Access to Information Act* and the *Privacy Act* in compliance with ATIP legislation, regulations and Treasury Board Secretariat policy instruments;
- Developing and maintaining OVO policies, procedures, guidelines, and processes in support of Access to Information and Privacy legislation and central agency requirements;
- Promoting awareness of both *Acts* within the OVO to ensure that employees understand their roles and responsibilities;
- Monitoring OVO compliance with both *Acts* and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament;
- Completing and coordinating the completion of Privacy Impact Assessments (PIAs) for the OVO;
- Coordinating the resolution of any complaints against OVO which have been submitted to the Information Commissioner under the *Access to Information Act* and to the Privacy Commissioner under the *Privacy Act*;
- Providing centralized management of privacy breaches within the OVO;
- Providing advice and guidance to OVO staff on ATIP issues; and
- Supporting the OVO in meeting its commitments to openness and transparency through proactive disclosure of information and the release of information via informal avenues.

6. Delegation Order

The responsibilities associated with the administration of the *Privacy Act* are delegated to departmental officials and OVO officials through a delegation order signed by the Minister of Veterans Affairs (attached as Annex 1).

7. Interpretation of the *Privacy Act* Statistical Report

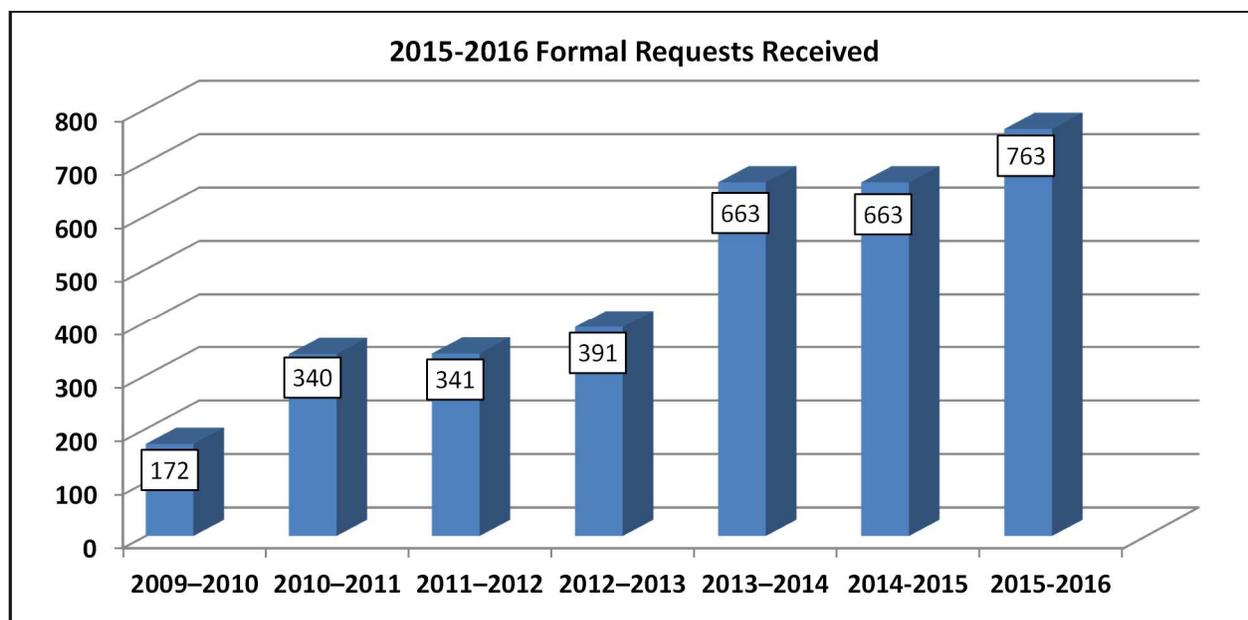
The following summary provides an interpretation of statistical data on the administration of the *Privacy Act* at VAC and the OVO between April 1, 2015, and March 31, 2016. A more detailed breakdown of processing statistics can be found in Annex 2 (VAC and OVO statistical report) and a separate interpretation specific to the OVO in Annex 3 (OVO statistical report).

Formal Requests under the *Privacy Act*

Between April 1, 2015 and March 31, 2016, the Department received 763 formal requests for information under the *Privacy Act* (763 by VAC and none by the OVO). This represents a 15% increase (or 100 requests) from 2014–2015 (see Annex 4 for a five-year comparison). As illustrated in the table below, formal requests have increased over the past two fiscal years as compared to previous years.

One factor in the increased number of formal request may be due to the fact that the Department is rendering more disability decision. In 2015-16 VAC adjudicated 38,029 disability claims, which represents a 29.8% (8,742 claims) increase in claims adjudicated over 2014-15. With the increase in disability decisions, there are more requests from Veterans for the supporting key evidence documents which led to a decision. These are processed as formal requests under the *Privacy Act*. In addition, there has been an increase in the number of requests for *complete* copies of Veteran files, including Service Health Records transferred from the Canadian Armed Forces to VAC when current and former members apply for VAC programs and services. This increase is due in part to increased awareness among Veterans, Veterans' organizations and advocates with respect to their access rights under the *Privacy Act*. As well, VAC ATIP staff are communicating more efficiently with requesters as part of the Duty to Assist principle contained in the *Federal Accountability Act*. More efficient communication assists requesters to find information without needing an entire package which may contain irrelevant and unnecessary documents.

As well, VAC continues to see a decline in the number of informal privacy requests. In 2012, the Department made a decision to process all requests formally by default. Requests that were previously treated informally are now being treated formally. VAC processed more than 500 informal requests processed in 2008-2009, and approximately 10 in 2015-2016.



On April 1, 2015, 81 open formal requests were carried forward from the previous year. Combined with the 763 requests received in 2015–2016, a total of 844 requests were active during the 2015–2016 fiscal year.

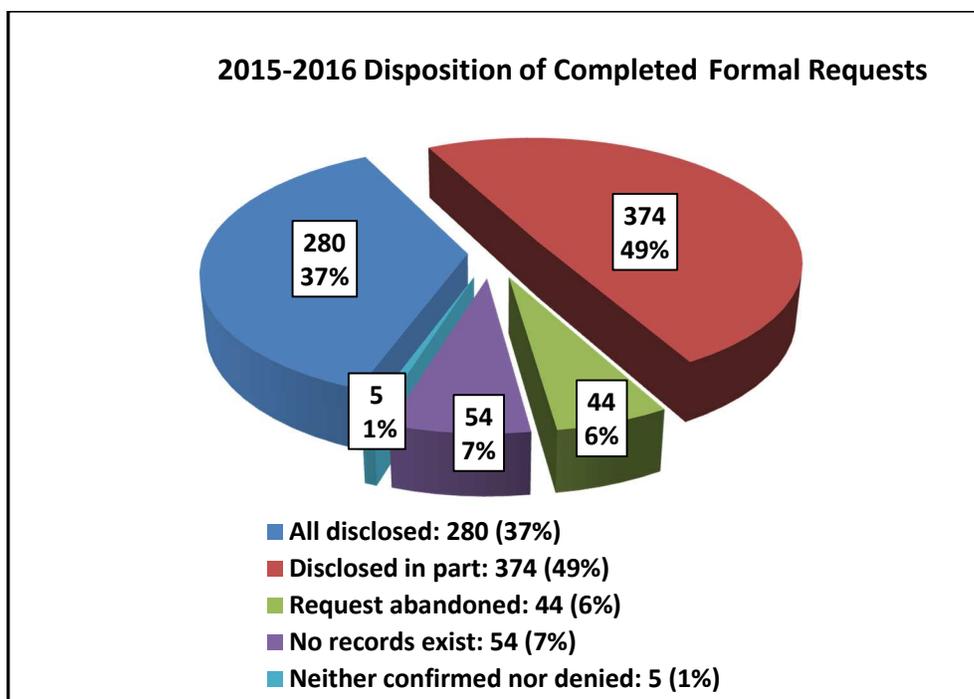
A total of 757 formal requests were completed during the reporting period (757 by VAC and none by the OVO). At the end of the fiscal year, 87 outstanding formal requests were carried forward to the 2016–2017 fiscal year.

Since April 2014, VAC has been accepting requests for information through the Government of Canada’s ATIP Online Request system. This system allows clients and other members of the public to submit requests for personal information under the *Privacy Act*, or for other information held by the institution under the *Access to Information Act*. In 2015-2016, VAC received 126 online formal requests for information under the *Privacy Act*. This represents 17% of all formal privacy requests submitted to the Department in the 2015-2016 fiscal year.

Disposition of Requests Completed

In total, 757 formal requests were completed during the 2015–2016 fiscal year compared with 771 requests completed in the previous year. During the reporting period, the Department processed 206,582 pages (no pages processed by the OVO) and disclosed 198,889 pages (no pages disclosed by the OVO). In comparison, the Department processed 434,287 pages and disclosed 256,953 pages in 2014–2015. This represents a 52% decrease in pages processed and a 22% decrease in pages disclosed for formal privacy requests compared with the previous reporting period.

The disposition of the 757 requests completed in 2015–2016 is illustrated in the following chart:



I Exemptions Cited

Canadians have a right of access to their personal information; however, the *Privacy Act* 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 head of the government institution to not disclose personal information in response to a privacy request. VAC invoked 408 exemptions¹ (408 by VAC and none by the OVO) under Sections 19, 21, 22, 25, 26, 27 and 28 of the *Privacy Act*. The most frequently applied exemption was Section 26, which allows the head of the institution to refuse to disclose information 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. The following table identifies the number of requests where specific types of exemptions were applied.

Exemptions cited	2013-2014	2014-2015	2015-2016
Paragraph 19(1)(a) (Information obtained in confidence)	0	1	0
Section 21 (International affairs and defence)	2	1	4
Paragraph 22(1)(a)(i) (Law enforcement and investigation)	2	0	0
Paragraph 22(1)(a)(ii) (Law enforcement and investigation)	1	1	0

¹ For statistical purposes, an exemption is counted only once when it is applied to a file multiple times.

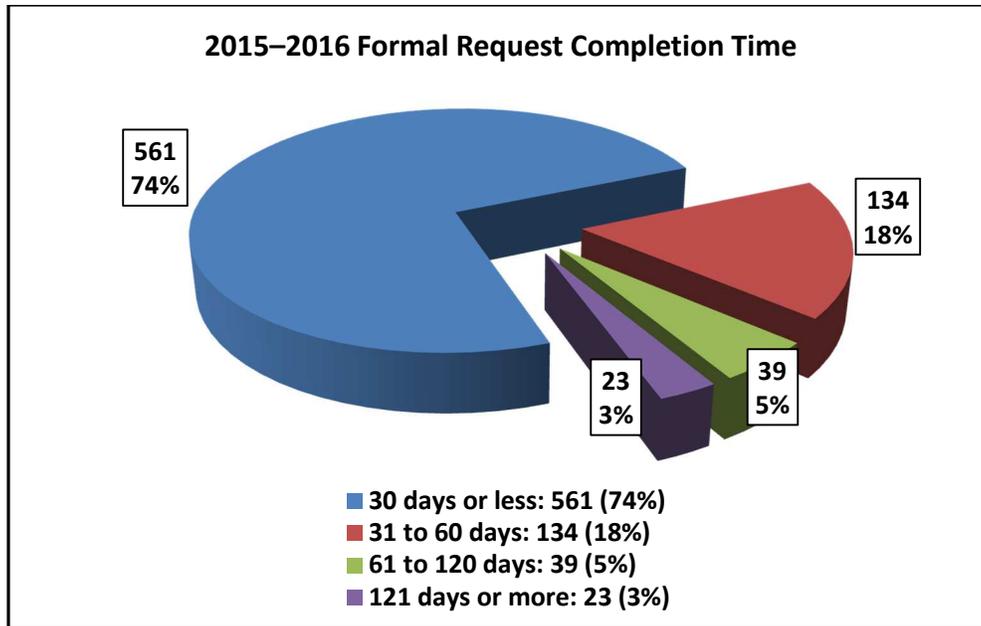
Exemptions cited	2013-2014	2014-2015	2015-2016
Paragraph 22(1)(b) (Law enforcement and investigation)	2	1	2
Section 25 (Safety of individuals)	1	3	0
Section 26 (Information about another individual)	392	484	388
Section 27 (Solicitor-client privilege)	4	9	7
Section 28 (Medical record)	7	8	7
Total exemptions cited	411	508	408

II Exclusions Cited

An exclusion is information to which the *Act* does not apply as described in Sections 69 and 70 of the *Privacy Act*. Examples 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. During this reporting period, there were no exclusions under Sections 69 and 70.

III Completion Time

Of the 757 requests completed, 561 requests were completed within the legislated time frame, an increase of 191 requests as compared with 2014–2015. During the 2015–2016 reporting period, 74% of the formal requests were completed in 30 days or less (VAC completed 561 and the OVO completed none); 18% were completed within 31 to 60 days; 5% were completed within 61 to 120 days; and, 3% of the requests requiring additional time and effort were completed in 121 days or more.



IV Extensions

During the reporting period, a total of 84 requests were extended by VAC. Of these, four were extended because processing the file within the original timelines would have unreasonably interfered with the Department’s operations. The other 80 extensions were due to consultation with other institutions. All 84 extensions were between 16 to 30 days in length.

V Translation

VAC received five privacy requests requiring translation during the 2015-2016 reporting period. In comparison, there was one privacy request (VAC or OVO) requiring translation during the 2014-2015 reporting period.

VI Format of Information Released

Individuals may obtain the information they have requested in three ways:

- 1) Receiving copies of the material;
- 2) Examining the information during an arranged time; or
- 3) Examining and receiving copies of the information.

Of the 757 formal requests completed by the Department in 2015-2016, in 654 cases the requestors received copies of the material requested (either fully or in part), 44 were abandoned by the applicant, 54 could not be processed because records did not exist, and in five cases, the existence of records was neither confirmed or denied.

Format of Information Released	2013– 2014	2014– 2015	2015– 2016
Copies of material in full or in part	652	681	654
Abandoned by applicant	67	46	44
No records exist	48	44	54
Neither confirmed or denied	0	0	5
Transferred to another institution	0	0	0
Nothing disclosed (exemption or exclusion)	0	0	0

VII Corrections and Notations

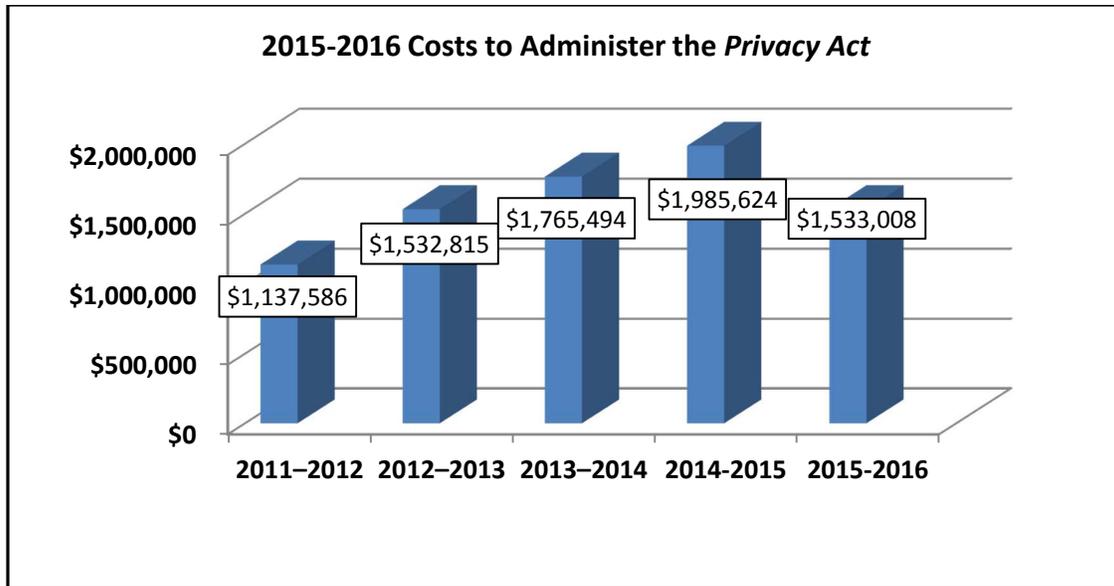
Under the *Privacy Act*, individuals are entitled to request correction and notation of personal information when they believe there is an error or omission therein. VAC received one request for corrections (none were received by the OVO) during the 2015–2016 reporting period, and that request was accepted. No corrections have been carried forward to the 2016–2017 fiscal year.

In comparison, the Department had six requests for corrections (six by VAC none by the OVO) during the 2014–2015 reporting period.

VIII Costs

The VAC and OVO ATIP Offices spent a combined total of \$1,533,008 to administer the *Privacy Act* during the reporting period. Staff salaries (including overtime) accounted for \$1,308,968 while Goods and Services, which includes Professional Service Contracts for training and PIA development amounted to \$224,040.

The decrease in costs can be attributed to several factors including networking with other Departments to incorporate best practices for processing Privacy requests as well as the elimination of a request backlog and disbanding of the backlog processing team at the end of 2014–2015.



8. Other ATIP Functions

In addition to processing *Access to Information Act* and *Privacy Act* requests, the VAC ATIP Office also handled a variety of requests internal to the Department, including, but not limited to:

- Analysis and response to privacy operational and policy questions;
- Review of new forms for the collection of personal information;
- Development of appropriate Privacy Notice Statements for forms and online presence;
- Evaluation of contracts and Memoranda of Understanding; and
- Provision of support in preventing, addressing and containing potential privacy breaches.

In addition to processing *Access to Information Act* and *Privacy Act* requests, the OVO ATIP Office also handled a variety of requests from within the Office, including the following:

- Analysis and response to internal access to information and privacy questions;
- Evaluation of contracts; and,
- Provision of support in preventing potential privacy breaches.

9. Consultations

VAC received no requests for consultations from other government institutions or organizations during the 2015–2016 reporting period and no consultations were carried forward into the 2016–2017 fiscal year.

OVO received no requests for consultations from VAC or other government institutions and organizations during the 2015-2016 reporting period and no consultations were carried forward into the 2016-2017 fiscal year.

10. Training and Awareness

Over the course of the year, departmental staff received ATIP-related training through a variety of mediums. ATIP training was delivered to 1,547 participants in 96 training sessions. The following describes the training activities related to privacy with respective participant numbers and sessions for each:

Integrated Security / ATIP Training 1,230 Participants in 78 Sessions

VAC's mandatory Security Orientation Training, offered to all employees upon entering the organization and then at periodic intervals, highlights:

- Need-to-Know principle;
- Concept of privacy breaches;
- Rules regarding accessing information;
- Disciplinary actions resulting from accessing personal information without authorization; and
- Overview of ATIP legislation and fundamentals.

ATIP Awareness Sessions 145 Participants in 11 Sessions

ATIP Awareness sessions focus on ATIP principles and best practices. The sessions provide an overview of the *Access to Information Act* and the *Privacy Act*; the Duty to Assist, exemptions and exclusions; and, the roles and responsibilities related to privacy management.

National Orientation and Training Program 150 Participants in 5 Sessions

As new front line employees, including Case Managers and Client Service Agents, are hired at VAC they are required to participate in a comprehensive orientation and training program. The new employees have an opportunity to be trained for their respective positions in a consistent way. ATIP is a focus of the training and includes roles and responsibilities from an ATIP perspective, including but not limited to: what is personal information; privacy breaches; what to document, role in retrievals related to ATIP requests; and, collection, use and disclosure principles.

Privacy Impact Assessment Training 22 Participants in 2 Sessions

ATIP hosted privacy impact assessment (PIA) training to program subject matter experts who are involved in the writing of PIAs. The training included an overview of the *Privacy Act* Legislation, the Treasury Board Secretariat Directive on PIAs, as well as a review of the CORE template and risk identification process.

11. Policies, Guidelines and Procedures

An agreement has been established between the ATIP Coordinators for VAC and the Department of National Defence (DND) regarding CAF Service Health Records. This agreement benefited both departments. VAC has been able to focus resources on processing Service Health Records rather than preparing consultation packages to DND, which has resulted in time savings and requests being processed more quickly. DND has seen a significant reduction in the number of privacy consultations received, and has been able to focus more of their resources on processing their own requests.

VAC and the OVO maintained and monitored current privacy policies, guidelines, and procedures. The OVO finalized a *Privacy Protection for Non Administrative Purposes Protocol* during the 2015-2016 reporting period.

12. Complaints and Investigations

In the 2015-2016 reporting period, the Privacy Commissioner received five VAC-related complaints. Of the five complaints received, two were related to use and disclosure of personal information, one a delay, one a refusal – exemptions and one time limits.

VAC had seven complaints carried over from previous fiscal years, and combined with the five received in 2015-2016, there were 12 complaints requiring action. Seven complaints received a ruling during the reporting period and six have been carried over to 2016-2017. Of the seven complaints that received a ruling in 2015-2016, one was deemed not well-founded, five were ruled as well-founded, none were discontinued and one was settled in the course of an investigation.

13. Privacy Impact Assessment

In accordance with the Treasury Board Secretariat's Directive on Privacy Impact Assessment, the Department conducts PIAs on new programs, systems or policies, or when substantial modifications are made to an existing program, system or policy, and when services are contracted to another party. The purpose of a 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. Initiatives are assessed and, when possible privacy concerns are identified, a mitigation strategy is developed to eliminate or lower the risk.

During the 2015–2016 fiscal year, VAC submitted 12 PIA's to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS). The following initiatives were assessed during the fiscal year:

Priority Hiring

The Government of Canada amended the *Public Service Employment Act* to enhance hiring opportunities for certain serving and former members of the Canadian Armed Forces (CAF) through Bill C-27 (Veterans Hiring Act). The amendments establish a right of appointment in priority to all other persons, for certain members of the CAF who are medically released for reasons that the Minister of Veterans Affairs determines are attributable to service.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-priority-hiring>

Income Data Exchange (VAC and Canada Revenue Agency) for Long Term Care Program and Veterans Independence Program – Intermediate Care

Every year on October 1, as stipulated in the *Veterans Health Care Regulations*, VAC adjusts the monthly amount that Veterans in long term care facilities must contribute to their accommodation and meals (A&M) costs. Recipients of support through the Long Term Care program and the Veterans Independence Program – Intermediate Care may be required to pay for the cost of A&M up to a maximum amount. The amount of A&M that an individual contributes is based on an analysis of their income. As a result, VAC has entered into an agreement with CCRA by way of a Memorandum of Understanding (MOU). This will enable VAC to obtain income information directly from CRA which will result in a reduction of administrative burden on eligible Veterans and civilians and will result in significantly less processing time for VAC staff.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-exchange>

Critical Injury Benefit (CIB)

The CIB is a new benefit which came into effect on July 1, 2015, which recognizes and compensates eligible CAF members and Veterans who on or after April 1, 2006 experienced a sudden, single incident that caused a severe and traumatic injury or an acute disease immediately resulting in a severe impairment and interference in quality of life. This compensation recognizes and compensates for the time between the initial injury or incident and when the CAF member is medically stabilized.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-nvc-cib>

Operational Stress Injury (OSI) Clinic Network

The OSI Clinic network provides specialized mental health care services for eligible Veterans and family members. In 2006 access was extended to still-serving members of the CAF and RCMP. In order to provide timely access to quality mental health care for Veterans and their family members, VAC opened its first OSI Clinic at Ste. Anne's Hospital in 2002. Since then VAC has signed agreements with Provincial Health Authorities across the country to establish and

run a nation-wide VAC funded network consisting of ten specialized outpatient clinics and one residential clinic. The network also includes a number of satellite clinics and several remote points of services.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-osi-clinic>

Family Caregiver Relief Benefit

The Family Caregiver Relief Benefit (FCRB), which came into effect in July 2015, recognizes the vital contribution of informal caregivers—who are most often family members—to the health and well-being of seriously injured Veterans. The benefit provides eligible Veterans with an annual tax-free grant of \$7,238, allowing their informal caregivers to take a well-deserved break while ensuring the Veterans continue to get the support they need. The FCRB is intended to, in addition to other benefits already paid through VAC, provide financial support for Veterans' informal care needs.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-family-caregiver>

Social Media Platform (Facebook)

As part of the commitment to better connect with Veterans, VAC is working to improve access to their services and information. In this context, and in compliance with the government's Web Renewal strategy, a Facebook page for Veterans Affairs Canada has been created providing the opportunity for the Department to provide information regarding services and receive immediate feedback from Veterans, potential clients and the public. VAC does utilize other social media platforms (i.e. Twitter); however, the uses (broadcasting, engaging, account management and account analytics) are the same as those examined in the Social Media PIA.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-social-media>

Transition Services and Casualty Management

Transition from military to civilian life for some CF members and their families can be quite difficult. Helping members transition from military to civilian life smoothly is VAC's priority. The VAC client service teams are available in offices across the country and on CF bases/wings to help members identify needs that they and their family may have. In addition, casualty management is a key activity that ensures members and their families receive immediate help when serious or very serious illnesses/injuries or deaths occur. This is critical for recovery and/or re-integration. The assistance and guidance that VAC provides may help to alleviate the stress, grief and suffering of the injured/ill member/family.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-transition-summary>

Financial Benefits - Retirement Income Security Benefit

On March 9, 2015, the Government of Canada announced a new financial benefit aimed at providing financial stability to Veterans who are moderately to severely disabled. The

amendments created a new income support benefit under the Financial Benefits Program referred to as the Retirement Income Security Benefit (RISB).

The new RISB works with VAC's existing services and benefits to establish a continuum of support that spans an eligible Veteran's entire life. It is designed for those whose ability to save for retirement was directly impacted by their service to our country. The current Earnings Loss Benefit ceases after the age of 65 resulting a drop in annual income. The new RISB provides eligible Veterans and survivors with continued assistance in the form of a monthly income support payment beginning at age 65. The RISB is intended to provide an income support level equivalent to at least 70% of a Veteran's pre-age 65 income support level from VAC. Income support would also be extended to eligible survivors through continued payment of a monthly benefit.

Link: <http://www.veterans.gc.ca/eng/about-us/organization/access-to-information-privacy/info-source/personal-information-banks/701#intro>

Departmental Printing and Mailing

The Departmental Printing and Mailing project was initiated to develop a system to enable the automation of printing and mailing of correspondence (client facing forms and their accompanying inserts) to Veterans and other clients. As of September 1, 2015, the Departmental Printing and Mailing services are delivered by Shared Services Canada (SSC). SSC is mandated to deliver Email, data centre and telecommunications services to federal departments and agencies. In addition, SSC also provides other optional cost-recovery services to government departments and agencies. An addendum was completed related to the new delivery.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-printing-mailing>

Rehabilitation Services and Vocational Assistance Program (ACVA)

An addendum was completed to update the May 2013 Rehabilitation Services and Vocational Assistance Program. VAC amended the *Canadian Forces Members and Veterans Re-establishment and Compensation Regulations* to ensure that the entirety of a person's background, both military and other experiences, be considered when developing a rehabilitation plan.

In addition, the "cost" factor will be amended to "cost effectiveness" to clarify the intent when developing the rehabilitation plan. Regulatory changes will be made to both Section 6 and Section 9 of the Regulations.

The classes of individuals that could be affected by this change include:

- Veterans
- Eligible spouses or common law partners
- Eligible surviving spouses or common law partners

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-nvc-rehab-va>

Rehabilitation Services and Vocational Assistance Program (Contract Award)

This addendum is an update to the May 2013 PIA of VAC's Rehabilitation Services and Vocational Assistance Program and subsequent regulatory amendment of May 2015.

On December 5, 2014, Public Works and Government Services Canada (PWGSC), on behalf of VAC, awarded a national contract to Canadian Veterans Vocational Rehabilitation Services (CVVRS), a joint venture between WCG International Consultants Ltd. and March of Dimes Canada, to provide vocational rehabilitation and vocational assistance services to Veterans and other eligible participants in VAC's Rehabilitation Services and Vocational Assistance Program. The effective date of the contract is June 5, 2015.

Link: <http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia-nvc-rehab-va>

Financial Benefits (Earnings Loss Benefit Increase for Part-Time Reserve Force & Expansion of Permanent Impairment Allowance Eligibility)

This addendum is an update to the November 2014 Privacy Impact Assessment of the VAC Financial Benefits Program.

On March 13, 2015, the Government of Canada announced that part-time Reserve Force Veterans will be provided a comparable Earnings Loss (EL) Benefit to full-time Reserve Force Veterans and Regular Force Veterans. The EL payable to eligible survivors and dependents of part-time Reserve Force Veterans will also increase.

As of April 2015, all Veterans of the Reserve Force who are eligible for the EL-Benefit will receive a minimum income of \$42,426. This is the same minimum amount a Regular Force Veteran receives through EL. The minimum amount is set at 75% of a basic corporal's salary. VAC will begin to inform recipients of the changes. Where additional income information is required, VAC will send letters to potential recipients asking them to provide proof of their income sources during the compensatory period.

On March 17, 2015, the Government of Canada announced that it would expand the eligibility for the Permanent Impairment Allowance by implementing changes to program policy and the Canadian Forces Members and Veterans Re-establishment and Compensation Regulations. The new changes will broaden the criteria so that more Veterans are eligible for this financial support each month. More Veterans who have a severe and permanent limitation in mobility or self-care, related to their military service, will receive this benefit.

Link: http://www.veterans.gc.ca/eng/about-us/reports/privacy-impact-assessment/pia_nvc_fin

The OVO did not complete any PIAs during the 2015-2016 reporting period. The OVO's PIA summaries can be found at: <http://www.ombudsman-veterans.gc.ca/eng/transparency/pia>.

14. Disclosures Pursuant to Paragraph 8(2) (m)

VAC had two disclosures of personal information pursuant to paragraph 8(2)(m)(i) of the *Privacy Act* during the 2015-2016 reporting period. The paragraph 8(2)(m) allows for disclosure for any purpose where the public interest in disclosure clearly outweighs any invasion of privacy that could result from the disclosure. The Privacy Commissioner was notified before the disclosure as required under subsection 8(5) of the *Privacy Act*.

OVO had no disclosures of personal information pursuant to paragraph 8(2)(m) of the *Privacy Act* during the 2015-2016 reporting period.

15. Appeals to the Courts

There were no appeals to the courts (for VAC or the OVO) during the reporting period.

16. Monitoring – Privacy Requests and Requests for Correction

I Veterans Affairs Canada

Monitoring

There is a robust case monitoring system in place for ATIP. Using reports produced by the case management software suite, the status of requests is reviewed by ATIP Team Lead, Operations Manager, and the Director on a weekly basis to monitor upcoming deadlines. In addition, monthly statistical reports indicating the number of incoming and outgoing privacy requests, as well as the number of overdue requests, are prepared for the ATIP Coordinator.

Requests for Correction

VAC receives very few requests for correction of personal information each year. Time frames for responding to these requests are monitored informally. Depending on the complexity of the request, the ATIP Coordinator may be advised, as well as senior officer-level officials in the related program area.

II Office of the Veterans Ombudsman

The OVO uses a tracking spreadsheet to monitor processing of requests for personal information and correction of personal information on a weekly basis when requests are being processed. This tracking spreadsheet is maintained by the ATIP Coordinator and the ATIP Liaison Officer. Any anticipated issues with processing are escalated to the Director, Corporate Services and Charlottetown Operations.

17. Privacy Breaches

I Veterans Affairs Canada

During the 2015-2016 fiscal year, 90 breaches impacting 114 individuals were confirmed by VAC. Of the 90 breaches, one was considered a material breach. A material privacy breach has the highest risk impact and is defined as one involving sensitive personal information and could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals.

VAC treats every breach as a serious matter, as of November 2015, to ensure VAC is consistent with other government departments and agencies, and in accordance with the Directive on Privacy Practices, only material breaches are reported to the Office of the Privacy Commissioner and the Treasury Board Secretariat.

The VAC Privacy Breach Policy as well as the Privacy Breach Procedures and Guidelines Manual are available to educate staff on privacy breaches, to raise awareness on how to prevent privacy breaches, to inform staff of their roles and responsibilities regarding privacy, and to provide information on how privacy breaches must be handled for effective resolution. An in-depth overview of roles and responsibilities including, but not limited to, Senior Managers, ATIP, Security, Information Technology, Communications and Audit and Evaluation staff, is provided in the Procedures and Guidelines.

Communication and notification strategies include an escalation process dictating that staff are required to report potential privacy breaches as soon as possible. The ATIP office investigates and notifies the Office of the Privacy Commissioner and the Treasury Board Secretariat of material breaches, and ensures that the affected individuals are notified in writing. Regular privacy breach updates are provided to Senior Management.

II Office of the Veterans Ombudsman

The OVO had no privacy breaches to report during this reporting period.

The Privacy Protection Procedures Manual that the OVO finalized during the 2014-2015 reporting period identifies roles and responsibilities within the OVO for handling breaches. The OVO also follows VAC policies, procedures, and guidelines as this is a shared area of responsibility between VAC and the OVO (as identified in the Memorandum of Understanding for the Administration of the *Access to Information and Privacy Acts* between VAC and the OVO).

Annex 1: VAC and OVO Delegation Order - *Privacy Act* and *Privacy Regulations*

Delegation Order - *Privacy Act* and *Privacy Regulations*

The Minister of Veterans Affairs, pursuant to section 73 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, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the Act and related regulations set out in the schedule below. This designation replaces all previous delegation orders.

Privacy Act Provisions and associated descriptions		Column 1 Deputy Minister and Associate DM	Column 2 All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	Column 3 Privacy Coordinator within the Department of Veterans Affairs Canada	Column 4 Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	Column 5 Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
8(2)(j)	Disclosure for research or statistical purposes	X	X	X		
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X	X	X		
8(5)	Notice of disclosure under paragraph 8(2)(m)	X	X	X		
9(4)	Consistent uses	X	X	X	X	
10	Personal information banks	X	X	X	X	
14(a)	Notice when access requested	X	X	X	X	
14(b)	Giving access to the record	X	X	X	X	
15	Extension of time limits	X	X	X	X	X
17(2)(b)	Language of access	X	X	X	X	X
17(3)(b)	Access in an alternative format	X	X	X	X	X

Privacy Act Provisions and associated descriptions		Column 1 Deputy Minister and Associate DM	Column 2 All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	Column 3 Privacy Coordinator within the Department of Veterans Affairs Canada	Column 4 Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	Column 5 Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
18(2)	Exempt banks	X	X	X	X	
19	Information obtained in confidence	X	X	X	X	
20	Federal-provincial affairs	X	X	X	X	
21	International affairs and defence	X	X	X	X	
22	Law enforcement and investigations	X	X	X	X	
23	Security clearances	X	X	X	X	
24	Individuals sentenced for an offence	X	X	X	X	
25	Safety of individuals	X	X	X	X	
26	Information about another individual	X	X	X	X	
27	Solicitor-client privilege	X	X	X	X	
28	Medical records	X	X	X	X	
31	Notice of intention to investigate	X	X	X		
33(2)	Right to make representations	X	X	X	X	
35(1)	Notice of actions to implement recommendations of Commissioner	X	X	X		
35(4)	Access to be given to complainant	X	X	X	X	

Privacy Act Provisions and associated descriptions		Column 1 Deputy Minister and Associate DM	Column 2 All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	Column 3 Privacy Coordinator within the Department of Veterans Affairs Canada	Column 4 Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	Column 5 Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
36(3)(b)	Notice of actions to implement recommendations of Commissioner concerning exempt banks	X	X	X		
51(2)(b), 51(3)	Special rules for hearings	X	X			
72	Annual report to Parliament	X	X	X		

Privacy Regulations Provisions and associated descriptions						
11(2), 11(4)	Notification concerning corrections	X	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health	X	X	X		
14	Examination in presence of medical practitioner or psychologist	X	X	X		

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 Operation	Full delegation	Full delegation
Legal Advisor	Full delegation	Full delegation
Director of Corporate Services and Charlottetown Operations	Full delegation	Full delegation



Minister of Veterans Affairs

March 16/16
Date

Annex 2: Statistical Report on the *Privacy Act* (VAC and OVO)



Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Department of Veterans Affairs Canada

Reporting period: 2015-04-01 to 2016-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	763
Outstanding from previous reporting period	81
Total	844
Closed during reporting period	757
Carried over to next reporting period	87

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	91	153	27	6	2	0	1	280
Disclosed in part	38	190	98	29	13	4	2	374
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	28	19	5	2	0	0	0	54
Request abandoned	26	11	4	2	0	0	1	44
Neither confirmed nor denied	2	3	0	0	0	0	0	5
Total	185	376	134	39	15	4	4	757

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	2	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	388
19(1)(f)	0	22.1	0	27	7
20	0	22.2	0	28	7
21	4	22.3	0		

2.3 Exclusions

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

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	202	82	9
Disclosed in part	127	251	3
Total	329	333	12

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	20637	19994	280
Disclosed in part	174293	168583	374
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	11652	10312	44
Neither confirmed nor denied	0	0	5
Total	206582	198889	703

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	243	2847	24	6070	10	6451	3	4626	0	0
Disclosed in part	168	5493	95	22601	64	45762	46	76079	1	18648
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	39	28	2	710	1	0	1	1630	1	7944
Neither confirmed nor denied	5	0	0	0	0	0	0	0	0	0
Total	455	8368	121	29381	75	52213	50	82335	2	26592

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	11	12	0	0	23
Disclosed in part	85	6	0	0	91
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	2	5	0	0	7
Neither confirmed nor denied	0	1	0	0	1
Total	98	24	0	0	122

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
128	66	5	8	49

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	43	2	45
16 to 30 days	22	5	27
31 to 60 days	20	1	21
61 to 120 days	18	4	22
121 to 180 days	6	3	9
181 to 365 days	0	0	0
More than 365 days	3	1	4
Total	112	16	128

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	3	0	3
French to English	2	0	2
Total	5	0	5

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
5	2	2	9

Part 4: Requests for Correction of Personal Information and Notations

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

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	9	0
Disclosed in part	3	0	70	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	1	0	1	0
Total	4	0	80	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	4	0	80	0
Total	4	0	80	0

Part 6: Consultations Received From Other Institutions and Organizations

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

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

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

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

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Ddays	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

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

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

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
5	8	7	0	20

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	12
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Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		\$1,292,998
Overtime		\$15,970
Goods and Services		\$224,040
• Professional services contracts	\$181,600	
• Other	\$42,440	
Total		\$1,533,008

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	14.90
Part-time and casual employees	2.79
Regional staff	0.00
Consultants and agency personnel	0.01
Students	0.48
Total	18.18

Annex 3: Statistical Report on the *Privacy Act* (OVO)



Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombudsman

Reporting period: 2015-04-01 to 2016-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting period	0
Total	0
Closed during reporting period	0
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	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
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

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		

2.3 Exclusions

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

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
Total	0	0	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	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	0	0	0

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	0	0	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
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	0	0	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
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	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 Subsections 8(2) and 8(5)

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

Part 4: Requests for Correction of Personal Information and Notations

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

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	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 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
Pending at the end of the reporting period	0	0	0	0

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

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

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							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

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

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

Part 8: Complaints and Investigations Notices Received

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

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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Part 10: Resources Related to the Privacy Act**10.1 Costs**

Expenditures		Amount
Salaries		\$0
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$0

10.2 Human Resources

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

Note: Enter values to two decimal places.

Annex 4: Five-Year Statistical Analysis (VAC and OVO)

	2011– 2012	2012– 2013	2013– 2014	2014– 2015	2015– 2016	Variance 2014–2015 and 2015–2016
Requests received	341	391	654	663	763	+15%
Requests carried forward from prior year	94	173	292	179	81	-55%
Total requests requiring action	435	564	946	842	844	+1%
Completed requests	262	272	767	771	757	-2%
Requests carried forward to next year	173	292	179	71	87	+23%
Completed in 30 days or less	108	109	310	370	561	+52%
Exemptions invoked	157	116	411	508	408	-20%
Pages released	65,266	62,667	228,010	256,953	198,889	-23%
<i>Privacy Act</i> -- Total costs of administration	\$1,137,586	\$1,532,815	\$1,765,494	\$1,985,624	\$1,461,548	-26%
FTEs	16.79	20.46	22.65	24.14	24.28	+1%
Complaints received	32	48	14	2	4	+100%
Complaints ruled on	17	15	46	18	7	-61%
PIAs completed	0	8	9	1	12	+1100%