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ANNUAL REPORT

on the Administration of the
Privacy Act

2024-2025

The Honourable Jill McKnight

Minister of Veterans Affairs and Associate Minister of National Defense

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Introduction

Veterans Affairs Canada (VAC) is pleased to present to Parliament its annual report on the administration of the *Privacy Act* for April 1, 2024 to March 31, 2025.

This report is prepared and tabled in accordance with section 72 of the *Privacy Act*, which requires that the head of every federal institution prepare and submit an annual report to Parliament on the administration of the *Act* during the fiscal year.

At VAC, we value our clients' contributions to the development of Canada as a nation and honour the sacrifices they have made in the defence of freedom and the pursuit of world peace. As an expression of Canada's gratitude to our Veterans, we strive to exemplify the high principles they have defended, and to be as open and transparent as possible.

The report for the Office of the Veterans Ombud on their administration of the *Access to Information Act* is attached to this report as Annex C.

Purpose of the *Privacy Act*

The *Privacy Act* grants individuals with a right to access and correct personal information about themselves that is under the control of a government institution. The *Act* establishes the legal framework governing the collection, retention, use, disclosure, disposition and accuracy of personal information in the administration of programs and activities by government institutions subject to the *Act*.

Under the *Privacy Act*, personal information is defined as information about an identifiable individual that is recorded in any form.

Examples of personal information include:

- The national or ethnic origin, colour, religion, age or marital status of an individual;
- The education, medical, criminal, financial or employment history of an individual;
- Any identifying number, symbol or other particular identifier assigned to an individual.

VAC's Mandate

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

- **Provide** leadership as a champion of Veterans, and administer and coordinate needed benefits and services; whether through the Government of Canada or in partnership with provincial and community programs and non-governmental organizations.

- **Help** Veterans access the supports and services they need, from all levels of government and the community at large, and maintain a leadership role in the care and support of all Veterans and their families.
- **Listen** to the suggestions of Veterans, their representatives and stakeholders to guide work and research, and strive to design and deliver programs that meet the modern and changing needs of Veterans and their families.
- **Engage** Canadians of all ages in paying tribute to Veterans and those who died in service, ensuring that the legacy of their tremendous contributions to peace and freedom is preserved for generations to come.

VAC fulfills its mandate through the delivery of programs such as disability benefits, financial benefits, rehabilitation, pension advocacy, education, and training supports. The Department also works to commemorate the achievements and sacrifices of Canadians during periods of war, military conflict and peace.

VAC serves a highly diverse group, reflecting the remarkable breadth of Canada's contributions to world peace, including:

Veterans:

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

Others:

- Civilians who are entitled to benefits because of their war time services;
- Former and still serving members of the Royal Canadian Mounted Police; and
- Survivors and dependents of the previous groups.

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

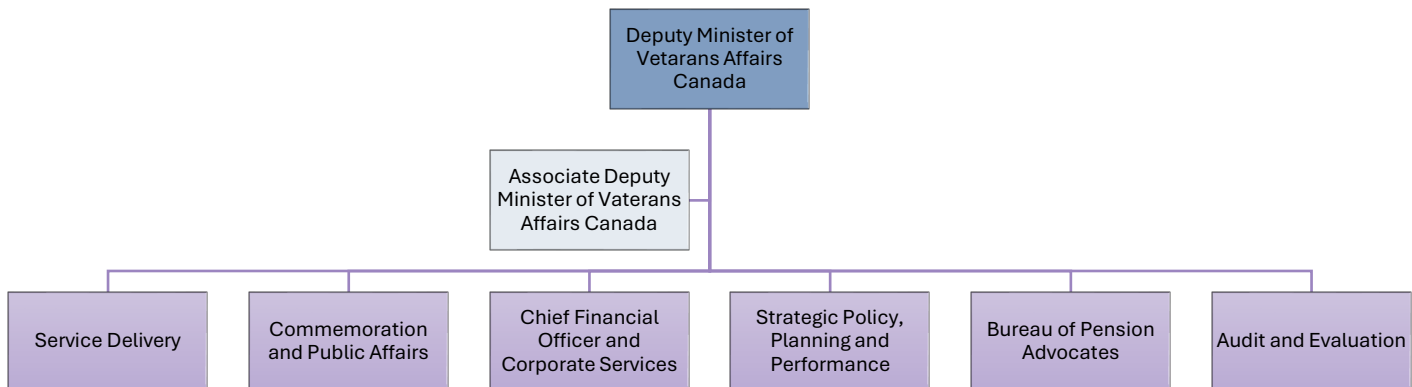
VAC's Organization Structure

The Veterans Affairs Portfolio consists of:

1. the Department of Veterans Affairs, which reports to the [Minister of Veterans Affairs](#);

2. the [Veterans Review and Appeal Board](#)¹, which reports to Parliament through the Minister of Veterans Affairs; and
3. the [Office of the Veterans Ombud](#), a special advisor to the [Minister of Veterans Affairs](#);

The Department is made up of four branches and two divisions which report to the [Deputy Minister of Veterans Affairs Canada](#).



The Access to Information and Privacy Office

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

The ATIP Office is responsible for administering both the *Access to Information Act* and the *Privacy Act* and is located in Charlottetown, Prince Edward Island. The Director of Privacy and Information Management serves as the Department's ATIP Coordinator and leads the ATIP Office.

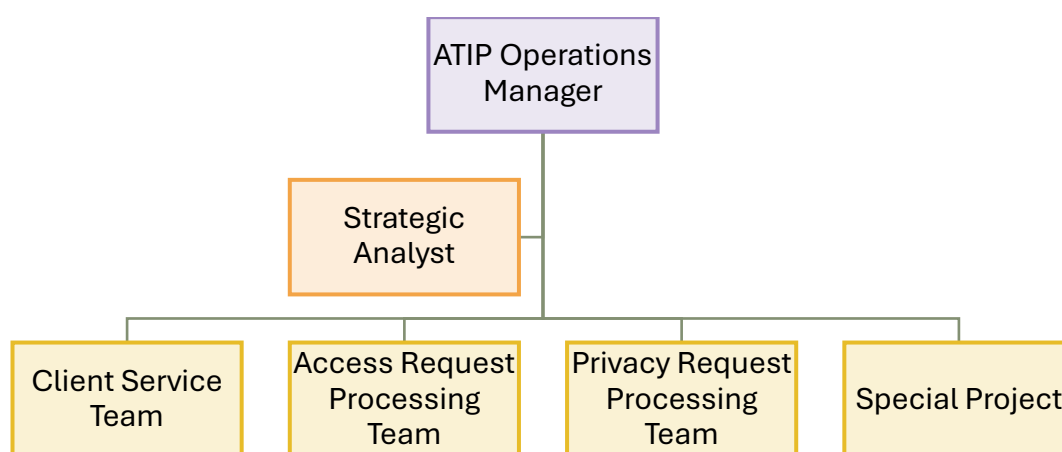
Privacy and Information Management includes four units whose work relates to information management (IM) and access to information and privacy:

- ATIP Operations
- Privacy and IM Policy
- IM Operations
- IM Projects.

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

The Privacy and Information Management Policy unit provides training, guidance, and recommendations on privacy and IM. It is responsible for coordinating privacy impact assessments, investigating privacy breach, responding to complaints from the Office of the Privacy Commissioner and collaborating with all areas of the Department to ensure ensure privacy and IM considerations are integrated into new programs and initiatives. This unit is composed of 9 full-time employees (FTEs).

The ATIP Operations unit is responsible for administering the access to information and privacy request program and fulfills this responsibility by processing requests in accordance with the Acts and providing relevant guidance to departmental branches. The unit consists of 23 FTEs and is organized into four teams, led by the ATIP Operations Manager, as follows:



The Client Service Team receives access to information and personal information requests from the public, as well as consultation requests from other government departments. This team works with employees to gather the necessary records to respond to ATIP requests, import and scan records into case management software and provide release packages to requesters.

The Access Request Processing Team is responsible for handling both formal and informal requests for government information, as well as complex privacy requests. Their work involves consulting with other government departments and third parties, as well as responding to incoming consultations from other government departments. The team oversees ATIP functions related to Motions for Production of Papers, Order Paper questions, proactive disclosure, and audits. In addition, they provide training to employees on their responsibilities in handling ATIP requests.

The Privacy Request Processing Team manages formal and informal requests for personal information and respond to record requests from the Department of Justice, as well as court orders and subpoenas received by the Department when it is not a party to the litigation. The Strategic Analyst provides functional advice, guidance, and support for ATIP Operations, VAC management, and employees. This includes drafting procedure manuals, process maps, forms,

and letters. They work to resolve complaints from the Offices of the Information Commissioner and Privacy Commissioner, as well as requests for correction of personal information.

The ATIP Operations Special Project Team has been working with VAC's Information Technology (IT) directorate to implement a new case management and redaction software, ATIPXpress, in preparation for implementation in 2025.

We did not employ any consultants or contractors during the reporting period, nor were there any ATIP employees working in VAC's regional offices.

VAC was not a party to any service agreements under section 96 of the *Access to Information Act*.

Delegation Orders

Pursuant to subsection 73(1) of the *Privacy Act*, the Minister of Veterans Affairs has delegated the power, duties and functions for the administration of the *Privacy Act* to VAC officials through a delegation order.

Authorities have been given to a number of leadership positions in our Department, including:

- Deputy Minister,
- Associate Deputy Minister,
- Assistant Deputy Minister of Corporate Services,
- Director General of Information Technology, Information Management, Administration, and Privacy Division, and
- Director of Privacy and Information Management.

These delegation orders ensure that appropriate administrative authorities have been delegated to the ATIP Officials responsible for effectively and efficiently administering the *Act*. The delegation order was signed June 5, 2023 and is included as Annex A of this report.

Performance

VAC's Statistical Report on the *Privacy Act* is included as Annex B of this report. This section provides an overview and analysis of key data on the Department's performance for the 2024-2025 reporting period.

VAC supports the ATIP program and recognizes the importance of responding to requests in a timely manner. To enhance these efforts in 2024–2025, resources within ATIP operations were reallocated, and experienced personnel from other areas were brought in to assist with the processing and review of privacy requests. Overtime was also utilized to help reduce the existing backlog. These measures proved effective, with only 17 late cases (0.005%) carried over into the next fiscal year.

Between April 1, 2024 and March 31, 2025, VAC received 2,884 requests under the *Privacy Act*. An additional 327 requests were carried forward from previous reporting periods, resulting in a total of 3,211 active requests during 2024–2025.

Of these, VAC closed 2,991 requests and carried 220 requests to the next reporting period. Of those, 203 requests were within the legislated timeline and 17 were carried over beyond the legislated timeline.

The following table provides an overview of the number of formal and informal requests processed during the reporting period.

Type of request	Requests closed	Pages processed	Pages disclosed
Formal	2,991	583,640	548,515
Informal	44	5,874	5,874
Total	3,035	589,514	554,389

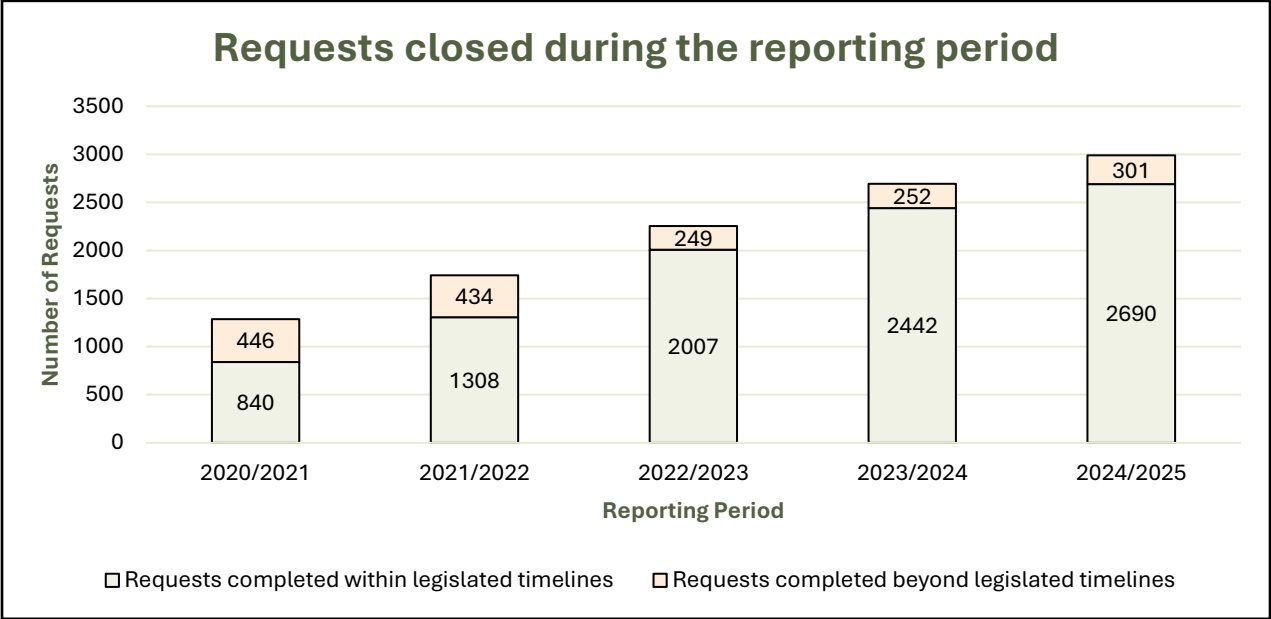
The following table gives an overview of formal privacy requests over the last 5 fiscal years.

Fiscal year	Requests received	Requests carried forward	Total caseload	Requests closed	Pages processed	Pages disclosed	Requests carried forward
2024-25	2,884	327	3211	2991	583,640	548,515	220
2023-24	2,820	201	3021	2694	483,901	472,144	327
2022-23	2,308	149	2457	2256	357,910	356,484	201
2021-22	1,695	196	1891	1742	439,405	437,099	149
2020-21	1,301	181	1482	1286	360,409	291,782	196

Number of requests closed within legislated timelines

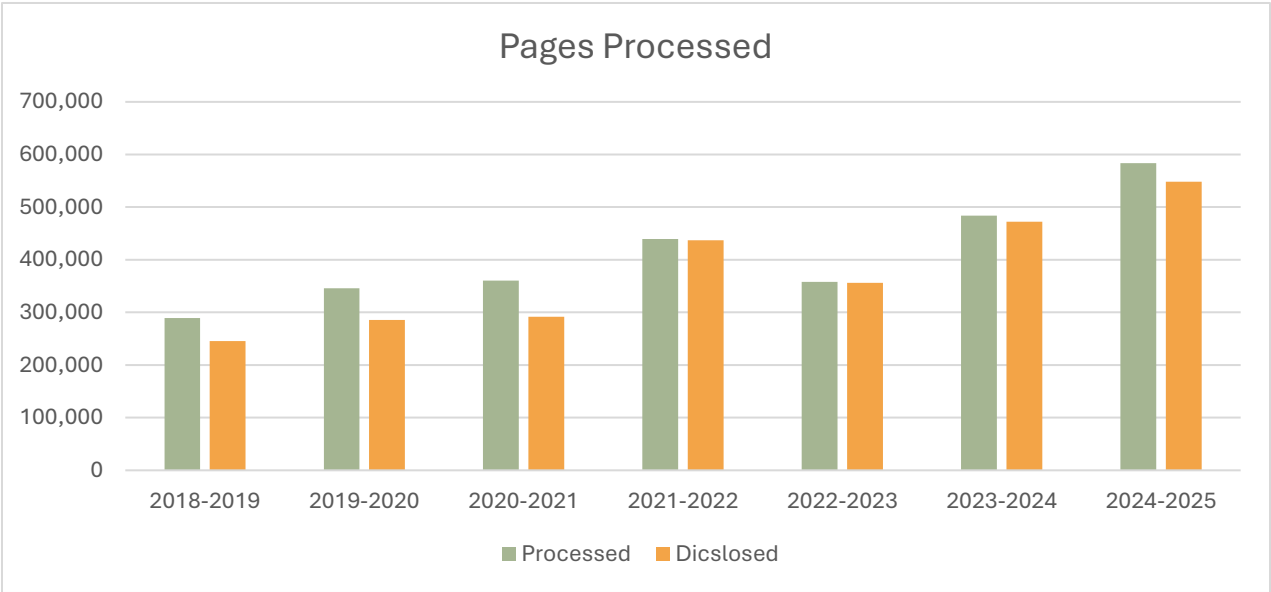
The following table shows the number of requests responded to within their legislative timelines, including requests for which the department invoked extensions. During the 2024-2025 reporting

period, VAC closed 90% of personal information requests within 30 days (or 60 days after an extension), remaining consistent with the previous reporting period in which VAC closed 91% of requests within 30 days (or 60 days after an extension).



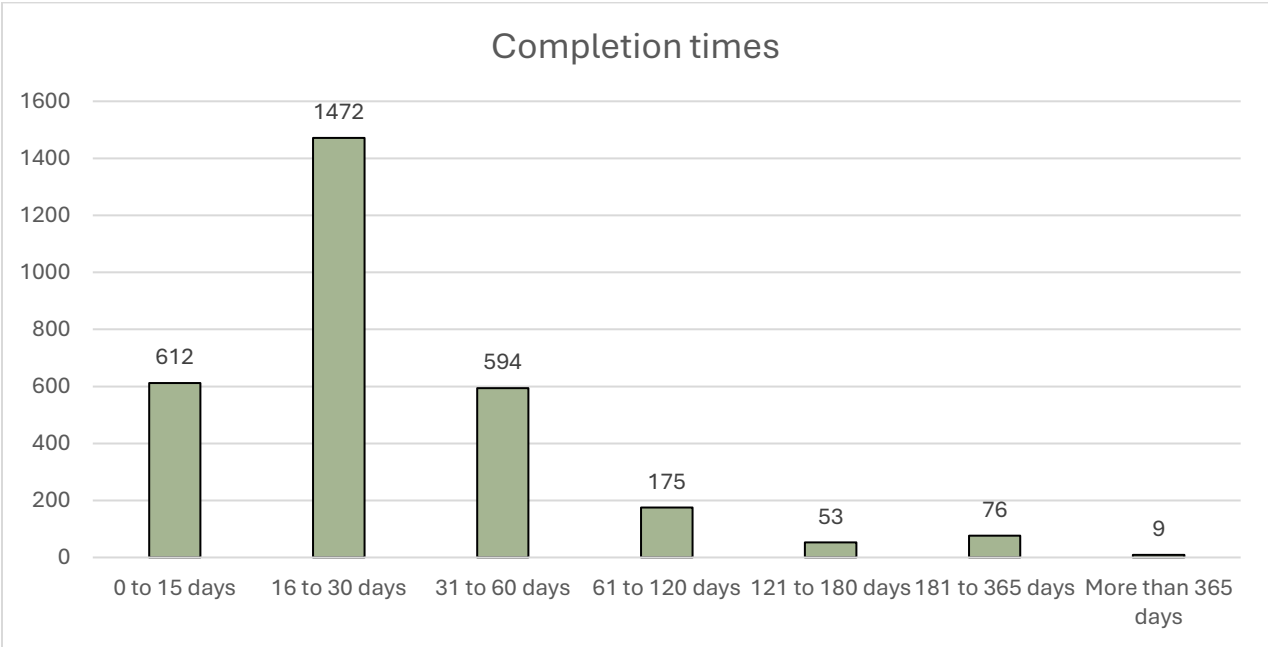
Number of pages processed and disclosed

The following chart illustrates the number of pages processed and disclosed from the 2019-2020 reporting period to the current reporting period. In the current reporting period, a total of 589,514 pages were processed in response to formal and informal requests which is an increase of 99,926 pages compared to the previous year.



Number of completed requests, broken down by completion times

The following chart show the number of requests completed during the reporting period broken down by the length of time taken to complete each one.



Number of active requests as of the last day of the reporting period

The following chart shows the number of active requests on the last day of the reporting period broken down by the year they were received. As of that date, 92% of open requests were on track to be completed within legislated timelines. Only 17 cases were outside of their legislated timelines, and none of these requests are more than two years old.

Fiscal year during which the open request was received	Open requests that are within legislated timelines as of March 31, 2025	Open requests that are beyond legislated timelines as of March 31, 2025	Total
Received in 2024 - 2025	203	14	217
Received in 2023 - 2024	0	3	3
Totals	203	17	220

Number of complaints received and active

Of the 2,991 requests closed during the reporting period, we received complaints on 10 (0.003%) requests relating to the processing of personal information.

The following table shows the number of outstanding complaints and the reporting period they were received.

Reporting period active complaints were received	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	Total
Number of active complaints	3	1	2	1	1	6	14

Information on the reasons for extensions

During the 2024-2025 reporting period we took 737 extensions. The following table shows the reasons for extensions.

	15(a)(i) Interference with operations		15(b) Translation purposes or conversion
Number of extensions taken	Large volume of pages	Large volume of requests	
737	296	439	2

The following table shows the length of the extensions taken.

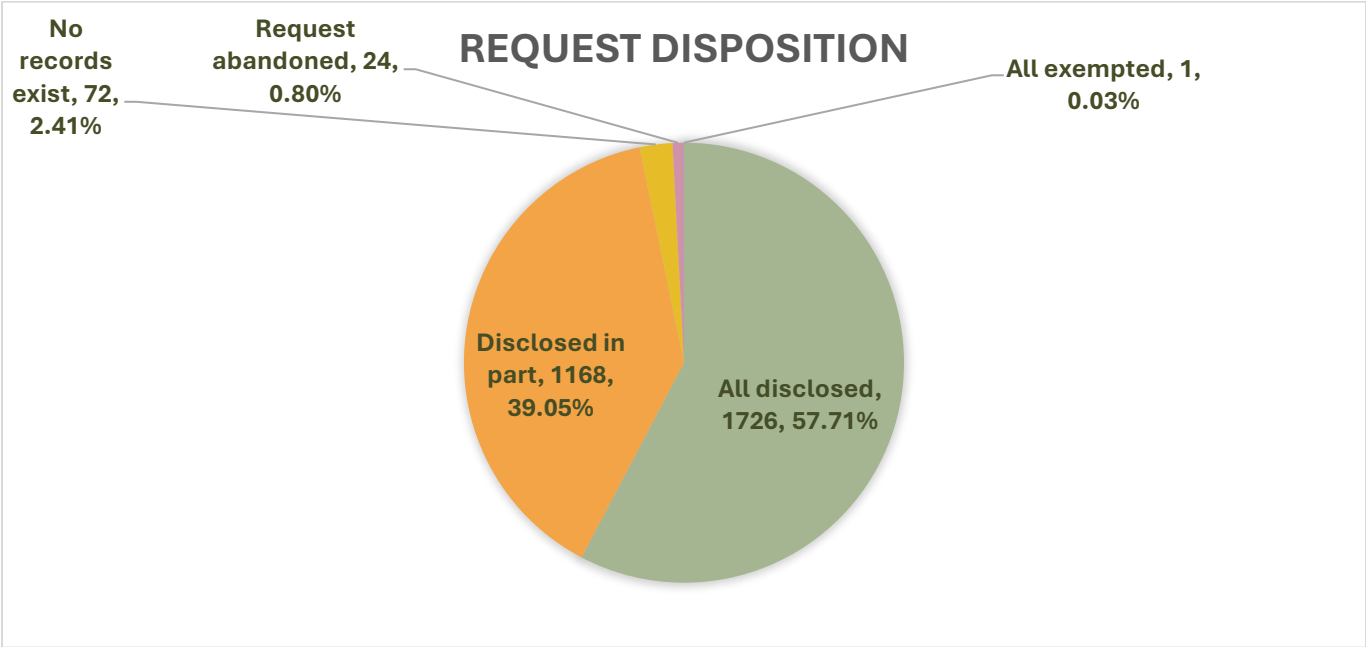
	15(a)(i) Interference with operations		15(b) Translation purposes or conversion
Length of extension taken	Large volume of pages	Large volume of requests	
1 to 15 days	0	0	0
16 to 30 days	296	439	2
31 days or greater	0	0	0
Total	296	439	2

Information on consultations completed for other institutions

VAC received one request for consultation from another Government of Canada institution during the reporting period. The recommendation was to disclose in part and we provided our response within 15 days.

Percentage of completed requests for which records were “all disclosed”, and percentage for which records were “disclosed in part”

A total of 1,726 requests were fully disclosed, representing 57.71% of all privacy requests processed in 2024–2025.



Training and awareness

In 2024-2025, VAC made a commitment to focus on Privacy and “Need to Know” training. The intent was to:

- Increase the delivery of privacy, ATIP and information management training within the Privacy and Information Management team and across VAC;
- Increase awareness among all VAC employees, and partners in service delivery, about their responsibilities to Veterans and Canadians when working with personal information;
- Create resources and tools to support learning and awareness; and
- Identify opportunities to support Veterans and their families in accessing information about VAC’s processes and their own personal records.

Privacy Training Sessions

In 2024-2025, training at VAC followed a multi-prong approach to education. This included targeted messages to Access to Information (ATI) and Privacy Professionals, VAC all-employee messages and targeted training to directorates or third-party service providers. The following table outlines those training sessions:

Training	Key Themes	Number trained	Notes
Privacy theme weeks – daily messages (Bilingual)	Privacy Awareness and Data Security	406	Emails targeted to ATI and Privacy Professionals
Privacy 101 / Need to Know Training (English)	See notes below	309	Online sessions For Internal VAC employees and external providers
Privacy 101/Need to Know (French)	See notes below	26	Online sessions provided Internal to VAC
Putting Privacy First (Bilingual)	Responsibilities of all VAC employees to protect privacy, how to avoid a privacy breach and best practices	350	Online sessions provided Internal to VAC
Privacy Trivia (Bilingual)	True and false, best practices tips and learning to reinforce privacy training	368	Interactive trivia games to reinforce privacy themes – held during theme weeks or during all staff events
Internal article shared to all VAC employees	Privacy Awareness Week – awareness and best practices	All VAC employees	Posted to an internal website, and highlighted in an all-employee email
Email to all VAC employees – Protecting Privacy in a hybrid work environment	How to ensure privacy as we increase our onsite workplace presence	All VAC employees	Bilingual email sent directly to all VAC employees.
Email to all VAC employees - Data Privacy Week at VAC	How to protect data and personal information at VAC	All VAC employees	Bilingual email circulated from Director General to all VAC employees.

Format of Training

Our training sessions are often delivered virtually to reach employees across the country. The sessions are presented by an ATIP professional, often accompanied by a Security professional. These sessions are one hour in length and cover the following topics:

- Defining personal information, privacy and how it is used at VAC.
- Reinforcement of employee responsibilities to protect the privacy of clients and employees.
- Training on the privacy retrievals process, including timelines and how to search.
- Defining and applying the “Need to Know” principle.
- Understanding consent and how to apply consent rules when working with clients.

- Branch specific examples of privacy issues and how to respond or address them.
- Tips to avoid a privacy breach.
- Guidance on how to work in a hybrid environment.
- IM best practices to support the protection of privacy and support the retrieval process.
- Consequences for those not respecting their responsibilities, or found to be in violation of the Acts; and
- Contact information / links to learn more and ask questions about Privacy.

Executive Communications related to Privacy

Throughout the year, the team ran three Access to Information and Privacy awareness campaigns. The Director General of Information Technology, Information Management, Administration and Privacy sent two emails to all VAC employees about our responsibilities related to privacy, tips to avoid a privacy breach, and best privacy practices for working in a hybrid work environment as employees increased their onsite presence.

Privacy and Information Management Learning Moments

In 2024-2025, Privacy and Information Management ‘learning moments’ were sent to all VAC employees in a weekly newsletter. These ‘learning moments’ were used to share best practices, tips to protect privacy and raise awareness about ATIP and Information Management. They focused on themes of:

- Access to information
- Privacy
- Avoiding privacy breaches
- Right to Know
- Need to Know
- Privacy in a hybrid environment
- Protecting personal information; and
- Best practices in IM

Onboarding Training

ATIP considerations are part of the required security training for all employees requiring a new or replacement security ID badges including:

- An overview of the *Access to Information* and *Privacy Acts*,
- The responsibilities of all employees to manage and protect personal information
- The “Need to Know” principle, and
- The consequences for any failure to abide by VAC policies or legislation.

In 2024-2025, the Privacy and Information Management team required all new employees to complete training in Security, Privacy, Access to Information and Cultural Competencies.

Cultural Competencies

As part of a Privacy Implementation Notice 2023-01 provided by Treasury Board Secretariat (TBS), Advancing Reconciliation with Indigenous Peoples by Providing Culturally Appropriate Services, all ATI and privacy professionals were encouraged to complete three Indigenous Cultural Competencies courses, provided through the Canadian School of Public Service, within one year of the notice, or within one year of their start date. VAC went a step further, making the courses mandatory for all ATI and Privacy professionals and has achieved full compliance with the request with all identified employees having completed the required courses:

- Reflecting on Cultural Bias: Indigenous Perspectives (IRA101)
- The Uncomfortable Truth: A Brief History of the Relationship Between Indigenous Peoples and the Government of Canada (IRA102)
- Cultural Competency: Indigenous Perspectives (IRA142)

Also, to support ongoing and continued learning and to support employees on their Reconciliation journey, Cultural Competency Learning Moments were introduced for all Privacy and Information Management professionals. Five Indigenous Learning Moments were delivered in 2024/2025.

Looking forward in training

Training Sessions

In 2025-2026, Privacy and “Need to Know” will continue to be provided to VAC employees. This training will be delivered through MS Teams and will provide employees and partners with:

- Privacy 101 training;
- Reinforcement of employee responsibilities to protect the privacy of clients and employees;
- Training on the privacy retrievals process, including timelines, how to search and identifying the difference between a privacy request for the organization and one specific to the employee;
- Defining and applying the “Need to Know” principle;
- Understanding and applying consent;
- PIBs and PIAs;
- Branch specific examples of privacy issues and how to respond or address them
- Tips to avoid a privacy breach;
- Guidance on how to work in a hybrid environment;
- IM best practices to support the protection of privacy and support the retrieval process;
- Consequences for those not respecting their responsibilities, or found to be in violation of the Acts; and
- Contact information / links to learn more and ask questions about Privacy.

Guidance

In 2025-2026, to support guidance in the workplace related to Privacy, VAC will review and update key pieces of guidance related to the storage of information, appropriate uses of technology relating to privacy and the storage of personal information. VAC will also update functional direction related to “Duty to Document” and “Need to Know” and educate employees about the changes.

Policies, guidelines and procedures

VAC continued to modernize processes and guidelines throughout the 2024-2025 reporting period. Significant progress was made in aligning internal processes with updated TBS instruments, and modernizing outdated tools.

Privacy Policy

In October 2024, TBS updated their privacy policy suite, removing the Directive on Privacy Impact Assessment and replacing this with the Standard on Privacy Impact Assessment, an appendix to the [Directive on Privacy Practices](#). As a result of this update, we began work on reviewing and validating our own internal policies, processes, and procedures. Highlights that resulted from this update include:

- Discontinuing the Privacy Impact Needs Determination (PIAND) template
- Implementing the new TBS Privacy Checklist
- Implementing the new TBS Privacy Impact Assessment (PIA) Template
- Updating our Privacy Protocol Template

Guidance on timely provision of records for ATIP

To support adherence to legislative deadlines, ATIP Operations enhanced its retrieval emails by including additional guidance for employees. This new guidance provides clear, step-by-step instructions in plain language to help employees deliver complete responses to records requests in a timely manner.

Guidance on disclosing information to avoiding nonsensical situations

In January 2024 TBS updated their Personal Information Request (PIR) manual. Section 10.13.3, Discretion to disclose, states that institutions may choose to exercise discretion to prevent nonsensical situations where an institution would be exempting information already known to a requester. An example is non-sensitive, factual information about another individual that has either been supplied by the requester, is known to the requester, or has already been supplied to the requester and where releasing it would not reveal additional personal information about the other individual.

In response, we developed new guidance and implemented this approach in August 2024. Unless there is a compelling reason for non-disclosure, we may disclose third party information in a personal information request (privacy) when:

- The requester is seeking access to their own witness statements;
- The requester was present when the information was provided to the department;
- The information is clearly within the requester's knowledge;
- Where our department would not otherwise have the information if not disclosed by the requester;
- Where the requester has or had a copy of the records; or
- The requester is one of the parties on a recorded phone call.

Guidance on disclosing information directly to clients

During the reporting period, we updated our guidance on disclosing information directly to clients by VAC employees and our contractor Partners in Canadian Veterans Rehabilitation Services (PCVRS) to facilitate easier access to information.

Initiatives and projects to improve privacy

Participating in ATIP community opportunities

During the reporting period, we were able to participate in TBS-led community of practice meetings and other community forums including:

- TBS's ATIP Community Meetings and Deep Dive Sessions and InfoBlitz meetings
- Participating in the ATIP Interdepartmental Leadership Network meetings
- Keeping up to date on initiatives and changes affecting the ATIP community as a whole.

Thanks to technology, government-wide collaboration is now easier than ever, and having an open line of communication with other ATIP practitioners has allowed a more cohesive and consistent practice.

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

We continue to raise awareness within VAC of the need for, and importance of applying an ATIP lens to program design work. When ATIP requirements are highlighted at the outset of program design, risks are reduced and that the most appropriate mitigation measures and strategies are in place before implementation.

During the reporting period, ATIP Operations had the opportunity to:

- Participate in a working group on the use of SharePoint as a new business solution;
- Engage in the M365 working group;

- Provide support and recommendations to the Contract Administration unit on critical ATIP considerations and contract requirements ; and
- Contribute to VAC's IT Modernization project.

Our involvement in these initiatives allows us to provide an ATIP perspective prior to implementation, helping to identify potential issues and areas requiring further consideration.

Working with internal clients

ATIP Operations provides services to several internal clients including Human Resources, and Service Delivery. We review documents for sensitivities based on the intent of the *Act*.

During the reporting period, ATIP Operations had 14 requests from internal clients to review documents for sensitivities, focusing primarily on identifying concerns related to personal information. During the reporting period, we reviewed a total of 1,566 pages.

Advancing technology

ATIP Operations is currently transitioning from its legacy request processing software solutions - AccessPro Case Management (APCM) and AccessPro Redaction (APR), which are approaching end-of-life and will no longer be supported by the vendor after June 2026.

In preparation for the transition to ATIPXpress, software approved by TBS, the ATIP Office worked closely with the vendor throughout the reporting period. A series of business analysis interviews, configuration sessions and user acceptance testing were conducted in collaboration with the vendor. This work resulted in the development of processor scripts for all file types.

The software development environment was installed in April 2024, followed by the production environment installation in February 2025. There were also two software upgrades in October 2024 and March 2025. A pilot plan and team were established, and a series of vendor-led and internal training sessions were provided to our initial users and pilot team. Planning was completed to provide licenses and training to all staff, in preparation for the full launch of the new software.

Improving Information Management

During fiscal year 2024-2025, VAC advanced the consolidation of digital workspaces into an integrated solution. The goal of this project is to have one space with an improved user experience, a storage quota and search capabilities.

Our IM, along with our IT counterparts, continued this work and made important steps in implementing OneDrive as the only space for personal work-related information:

The transition to OneDrive for all personal work-related information will continue and is expected to be complete in the 2025-2026 fiscal year. With this consolidation of information, we anticipate more efficient and effective ATIP retrievals.

Summary of key issues and actions taken on complaints

Complaints received during the 2024-2025 reporting period

During the reporting period, we received 10 complaints relating to the processing of personal information requests. Of these, 5 complainants believed other records should exist, 3 concerned applied exemptions and 2 were related to time limits. At the end of the reporting period, 2 complaints remain active and we continue to work closely with the Office of the Privacy Commissioner (OPC) to resolve them.

Additionally, we received 7 complaints related to the use, retention or disclosure of personal information. At the end of the reporting period, 3 of those complaints remained active and we are working with the OPC to resolve them.

Complaints closed during the 2024-2025 reporting period

During the reporting period we closed 12 complaints relating to the processing of personal information requests. Of the 12 complaints closed, 9 were closed in early resolution and 3 were discontinued. There were no well-founded complaints relating to the processing of personal information requests.

We closed 5 complaints related to use, retention or disclosure of personal information during the reporting period. Of those, 2 were closed in early resolution, 1 was discontinued, 1 resolved and 1 was well founded and resolved.

With respect to the well-founded complaint, it was determined that an individual accessed the VAC client file of the complainant without proper consent. In response, VAC implemented several mitigation and corrective measures to reduce the risk of future occurrences:

- Removed the individual's access to the complainant's file;
- Drafted new functional direction on consent;
- Updated access requirements to VAC client files; and
- Initiated monthly compliance reports to monitor adherence to these requirements.

Material Privacy Breaches

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

There were four material privacy breaches reported to TBS and the OPC during the 2024-2025 reporting period. The nature of these complaints related to unauthorized access, wrongful disclosure, use and disclosure, and loss. In response to these complaints, VAC took the following actions:

- Multiple communications about “need to know” have been sent out to all VAC staff via email.
- Notices have been placed on VAC’s internal website for employees.
- Training sessions offered to employees on the "need to know" principle.
- Communications have been sent to all employees about the importance that the use of information is consistent with the purpose for which it was collected.
- Client essential notifications in VAC’s client system (CSDN) were updated to better protect the identities of employees who are also clients.
- Employees were reminded to review and verify all information prior to uploading to a client file.
- Privacy training materials were updated to emphasize that employees must review and verify all information before uploading it to a client file.

We had a total of 104 non-material privacy breaches. VAC treats every breach as a serious matter and requires employees to report privacy incidents as soon as possible. In accordance with the TBS Directive on Privacy Practices and the Guidelines for Privacy Breaches, only material privacy breaches are reported to the OPC and TBS. VAC’s practice is consistent with other government institutions and TBS guidance.

Privacy Impact Assessments

VAC did not complete any new Privacy Impact Assessments during the reporting period. One Privacy Impact Assessment on the Income Replacement Benefit was modified.

Public Interest Disclosures

No disclosures were made under paragraph 8 (2)(m) of the *Privacy Act* during the reporting period.

Monitoring Compliance

ATIP Operations produces weekly and monthly reports to monitor our performance in administering the *Privacy Act*. These reports include data on record retrieval timeliness, the number of closed cases, and the volume of cases and pages disclosed. The reporting provides key operational data for the ATIP Office internally, as well as summary information for VAC senior management.

This reporting enables effective workload management by allowing us to monitor deadlines, allocate resources efficiently, escalate outstanding retrievals as needed, and identify potential trends in the types of information being requested.

Closing Remarks

The 2024-2025 fiscal year was another productive year for VAC's ATIP Operations team. Following the introduction of new guidance on disclosing information to avoid non-sensical situations, the number of personal information requests closed increased by 297, and the number of pages processed increased by over 99,000 pages. Additionally, the team continued to put a strong emphasis on training and education – both internally, within the Privacy and Information Directorate, and with the broader VAC employee-base, as well as our third-party service providers.

We continue to monitor the upward trend in requests, noting that the number of formal requests has more than tripled over the past 7 years. With this significant growth we will continue to find new ways to streamline our processes and boost productivity to meet our legislative obligations.

Moving forward, we remain committed to identifying and pursuing opportunity for continuous improvement.

Annex A – Delegation Order



Veterans Affairs
Canada

Anciens Combattants
Canada

Privacy Act
Delegation Order

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

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

This designation replaces all previous delegation orders.

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

Cette désignation remplace tous les arrêtés de délégation antérieurs.

The Minister of Veterans Affairs Canada
Ministre, Anciens Combattants Canada

Lawrence MacAulay
Minister of Veterans Affairs
Ministère des Anciens Combattants

Signed in Ottawa, Ontario, Canada this 5th day of June, 2023
Signé à Ottawa, Ontario, Canada ce 5^e jour de juin 2023

Canada

Delegation Order - *Privacy Act*

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

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

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

Notice of disclosure under paragraph 8(2)(m)	8(5)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management
Record of disclosures to be retained	9(1)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Directors General • Director, Privacy and Information Management
Notification of the Privacy Commissioner of any new consistent uses of personal information and ensure use is included in next statement of consistent uses set forth in the Index	9(4)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy
Personal information to be included in personal information banks	10	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Notice where access requested	14	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy

Extension of the 30 day time limit to respond to a privacy request	15	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy • Officer, Access to Information and Privacy
Where access is refused	16	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Decision on whether to translate a response to a privacy request in one of the two official languages	17(2)(b)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy • Officer, Access to Information and Privacy
Decision on whether to convert personal information to an alternate format	17(3)(b)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy

Decision to refuse to disclose personal information contained in an exempt bank	18(2)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy
Exemption - Personal information obtained in confidence	19(1)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Exemption – Where authorized to disclose	19(2)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Refuse to disclose personal information that may be injurious to federal-provincial affairs	20	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Refuse to disclose personal information that may be injurious to international affairs or the defence of Canada or one of its allies	21	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy

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

Refuse to disclose personal information which could threaten the safety of individuals	25	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Refuse to disclose personal information about another individual and shall refuse to disclose such information where disclosure is prohibited under section 8	26	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Refuse to disclose personal information that is subject to solicitor-client privilege	27	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Refuse to disclose protected information – patents and trade-marks	27.1	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy

Refuse to disclose personal information relating to the individual's physical or mental health where the disclosure is contrary to the best interests of the individual	28	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Right to make representations to the Privacy Commissioner during an investigation	33(2)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Provision of addition personal information to a complainant after receiving a 35(1)(b) notice	35(4)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy
Request that a court hearing, undertaken with respect to certain sections of the Act, be held in the National Capital Region	51(2)(b)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management
Prepare annual report to Parliament	72(1)	<ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management

Privacy Regulations – Delegated Authorities

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

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

Annex B – Statistical Report on the *Privacy Act*



Government
of Canada

Gouvernement
du Canada

Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada

Reporting period: 2024/04/01 to 2025/03/31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		2884
Outstanding from previous reporting periods		327
• Outstanding from previous reporting period	327	
• Outstanding from more than one reporting period	0	
Total		3211
Closed during reporting period		2991
Carried over to next reporting period		220
• Carried over within legislated timeline	203	
• Carried over beyond legislated timeline	17	

1.2 Channels of requests

Source	Number of Requests
Online	796
E-mail	1987
Mail	86
In person	0
Phone	2
Fax	13
Total	2884

Section 2: Informal Requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		45
Outstanding from previous reporting periods		14
Outstanding from previous reporting period	13	
Outstanding from more than one reporting period	1	
Total		59
Closed during reporting period		44
Carried over to next reporting period		15

2.2 Channels of informal requests

Source	Number of Requests
Online	20
E-mail	22
Mail	3
In person	0
Phone	0
Fax	0
Total	45

2.3 Completion time of informal requests

Completion Time							
0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
3	2	4	9	6	11	9	44

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
25	513	16	3744	3	1617	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	0 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	514	964	193	27	9	18	1	1726
Disclosed in part	54	472	390	147	41	57	7	1168
All exempted	0	0	0	0	1	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	33	32	5	1	1	0	0	72
Request abandoned	11	4	6	0	1	1	1	24
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	612	1472	594	175	53	76	9	2991

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	5
19(1)(e)	0	22(2)	0	26	1166
19(1)(f)	0	22.1	0	27	7
20	0	22.2	0	27.1	0
21	0	22.3	0	28	1
		22.4	0		

3.3 Exclusions

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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
1154	1740	0	2	16	0

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
583640	548515	2919

3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	1548	39588	124	24930	29	19764	22	37690	3	17457
Disclosed in part	686	26910	282	62829	60	41630	138	273923	2	25115
All exempted	0	0	1	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	13	118	4	1110	4	2376	3	10200	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2247	66616	411	88869	93	63770	163	321813	5	42572

3.5.3 Relevant minutes processed and disclosed for audio formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
1991	1933	16

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	4	79	3	216	3	647
Disclosed in part	2	25	1	75	3	949
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	6	104	4	291	6	1596

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
50	50	2

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	2	50	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	2	50	0	0	0	0

3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	1	0	0	0	1
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	1	0	0	0	1

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	2690
Percentage of requests closed within legislated timelines (%)	89.93647609

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	Interference with operations / Workload	External Consultation	Internal Consultation	Other
301	283	0	0	18

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

Number of days past legislated timelines	Number of requests past legislated timeline where no extension was taken	Number of requests past legislated timeline where an extension was taken	Total
1 to 15 days	13	54	67
16 to 30 days	4	35	39
31 to 60 days	2	56	58
61 to 120 days	5	48	53
121 to 180 days	3	39	42
181 to 365 days	2	36	38
More than 365 days	0	4	4
Total	29	272	301

3.8 Requests for translation

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

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

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

Section 5: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	4
Requests for correction accepted	0
Total	4

Section 6: Extensions

6.1 Reasons for extensions

Number of extensions 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 70)	External	Internal	
737	0	296	439	0	0	0	0	2

6.2 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 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	296	439	0	0	0	0	2
31 days or greater								0
Total	0	296	439	0	0	0	0	2

Section 7: Consultations Received From Other Institutions and Organizations

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

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	1	18	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	1	18	0	0
Closed during the reporting period	1	18	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	0 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	1	0	0	0	0	0	0	1
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

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

Recommendation	Number of days required to complete consultation requests							Total
	0 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

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		100-500 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

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 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 9: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
18	7	2	0	27

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

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	1

10.2 Institution-specific and Central Personal Information Banks

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

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

Number of material privacy breaches reported to TBS	4
Number of material privacy breaches reported to OPC	4

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	104
11.2 Non-Material Privacy Breaches	
Number of non-material privacy breaches	104

Section 12: Resources Related to the *Privacy Act*

12.1 Allocated Costs

Expenditures		Amount
Salaries		\$2,002,923
Overtime		\$43,164
Goods and Services		\$177,865
• Professional services contracts	\$0	
• Other	\$177,865	
Total		\$2,223,952

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	22.080
Part-time and casual employees	0.306
Regional staff	0.000
Consultants and agency personnel	0.000
Students	1.243
Total	23.629

Note: Enter values to three decimal places.

Annex C – OVO Annual Report on the Administration of the *Privacy Act*

Introduction

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

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

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

This annual report on the administration to the *Privacy Act* describes how the Office of the Veterans Ombud fulfilled their responsibilities under the *Privacy Act* during the fiscal year April 1, 2024, to March 31, 2025. This report is being prepared to be tabled in Parliament in accordance with section 72 of the *Privacy Act*.

The mandate of the OVO, found in the [Order in Council P.C. 2007-530](#), shall be:

- to review and address complaints by clients [of Veterans Affairs Canada] and their representatives arising from the application of the provisions of the [Veterans Bill of Rights](#);
- to 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 clients;
- to review and address complaints by clients [of Veterans Affairs Canada] 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;

- to review systemic issues related to the (Veterans Review and Appeal) Board; and
- to facilitate access by stakeholders to programs and services by providing them with information and referrals.

Organizational Structure

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

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both acts are met. Processing of requests is centralized within the unit. The Unit consists of the Director - Veterans Intervention Services, and the Knowledge Management Coordinator. These staff members were assigned to the administration of both acts on a part time (as required) basis during the 2024-2025 reporting period, which represents 0.42 of an FTE.

The main activities of the OVO ATIP Unit include:

- Processing OVO requests for information submitted under the *Access to Information Act* and *The Privacy Act*, including consulting with other federal departments and third parties with respect to ATIP requests received;
- Developing OVO policies, procedures, guidelines and processes in support of Access to Information and Privacy and central agency requirements;
- Monitoring legislative and regulatory changes that impact ATIP;
- Providing awareness and training on ATIP to ensure that OVO employees understand their roles and responsibilities;
- Monitoring OVO compliance with both acts, regulations and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament on the administration of the *Acts*;
- Leading the development of Privacy Impact Assessments (PIAs) for the OVO;
- Working closely with VAC for the resolution of any complaints against OVO which have been submitted to the Information Commissioner of Canada and the Privacy Commissioner of Canada;

- Providing centralized management of privacy breaches within the OVO;
- Providing advice, guidance and training to OVO staff on ATIP issues;
- Analyzing and responding to OVO privacy and access to information policy issues;
- Reviewing new and amended OVO forms and processes that impact the collection of personal information
- Developing appropriate Privacy Notice Statements for the OVO; and,
- Evaluating OVO contracts and Memoranda of Understanding.

Delegation Order:

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

Performance 2024–2025

Key Performance Measures

- 50% (2 out of 4 requests) were closed within legislated timelines
- Completed Requests by Completion Time:
 - 1 completed within 0–15 days
 - 1 completed within 16–30 days
 - 1 completed within 31–60 days
 - 1 completed within 121–180 days
- As of March 31, 2025, there were no requests carried over to the next reporting period, therefore, no breakdown by fiscal year or timeline status is applicable
- No complaints were received during the reporting period
- There was one extension taken, due to heavy workload caused by a high volume of records.
- There were no consultations completed for other institutions during the reporting period
- The percentage “All disclosed” was 25% (1 out of 4), “Disclosed in part” was 50% (2 out of 4), and 25% (1 out of 4) was “Request Abandoned”

Training and Awareness:

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

Policies, Guidelines, Procedures and Initiatives

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

The OVO also maintained and monitored current Access to Information policies, guidelines and procedures during the 2024-25 reporting period.

Initiatives and Projects to Improve Privacy

The OVO did not undertake any initiatives or projects outside of the training and awareness sessions for the 2024 – 2025 reporting period.

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

In the 2024 - 2025 reporting period, OVO received no complaints in relation to privacy requests. No complaints were carried over from 2023 - 2024. The OVO had no audits or investigations concluded during the reporting period.

Material Privacy Breaches:

There were no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the 2024 – 2025 reporting period.

Privacy Impact Assessments (PIA's):

The OVO did not complete any PIAs during the 2024 – 2025 reporting period.

Public Interest Disclosures:

The OVO had no disclosures made under paragraph 8 (2)(m) of the *Privacy Act* during the 2024 – 2025 reporting period.

Monitoring Compliance:

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



Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombud

Reporting period: 2024/04/01 to 2025/03/31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		4
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		4
Closed during reporting period		4
Carried over to next reporting period		0
• Carried over within legislated timeline	0	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	3
E-mail	1
Mail	0
In person	0
Phone	0
Fax	0
Total	4

Section 2: Informal requests

2.1 Number of informal requests

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

2.2 Channels of informal requests

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

2.3 Completion time of informal requests

Completion Time							
0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
0	0	0	0	0	0	0	0

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	0 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	1	0	0	0	0	1
Disclosed in part	0	1	0	0	1	0	0	2
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	1	0	0	0	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	1	1	1	0	1	0	0	4

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	4
19(1)(e)	0	22(2)	0	26	5
19(1)(f)	0	22.1	0	27	4
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

3.3 Exclusions

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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
1	3	0	0	0	0

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
1690	1690	4

3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	1	16	0	0	0	0	0	0	0	0
Disclosed in part	0	0	1	185	0	0	1	1489	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	1	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2	16	1	185	0	0	1	1489	0	0

3.5.3 Relevant minutes processed and disclosed for audio formats

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

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

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

3.5.5 Relevant minutes processed and disclosed for video formats

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

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

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

3.5.7 Other complexities

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

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	3
Percentage of requests closed within legislated timelines (%)	75

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	Interference with operations / Workload	External Consultation	Internal Consultation	Other
1	1	0	0	0

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

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

3.8 Requests for translation

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

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

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

Section 5: Requests for Correction of Personal Information and Notations

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

Section 6: Extensions

6.1 Reasons for extensions

Number of extensions 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 70)	External	Internal	
1	0	1	0	0	0	0	0	0

6.2 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 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	1	0	0	0	0	0	0
31 days or greater								0
Total	0	1	0	0	0	0	0	0

Section 7: Consultations Received From Other Institutions and Organizations

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

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

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	0 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

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

Recommendation	Number of days required to complete consultation requests							Total
	0 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

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		100-500 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

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 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 9: Complaints and Investigations Notices Received

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

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

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

10.2 Institution-specific and Central Personal Information Banks

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

Section 11: Privacy Breaches**11.1 Material Privacy Breaches reported**

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

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	2
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Section 12: Resources Related to the Privacy Act**12.1 Allocated Costs**

Expenditures	Amount
Salaries	\$35,714
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
Total	\$35,714

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.410
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	0.410

Note: Enter values to three decimal places.