

The Honourable Ginette Petitpas Taylor

Minister of Veterans Affairs and Associate Minister of National Defense

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Introduction

At Veterans Affairs Canada (VAC), we value our clients' contributions to the development of Canada as a nation, and honour the sacrifices they have made in the defence of freedom and the pursuit of world peace. As an expression of Canada's gratitude to our Veterans, we strive to exemplify the high principles they have defended, and to be as open and transparent as possible, which shows that we are accountable and responsible for our actions and accept the consequences of our decisions.

The *Privacy Act* operates to protect the personal information of Canadians that is held by the Government of Canada. All individuals, whether they are within or outside Canada, may request access to any personal information about themselves under the control of a federal institution. The Act also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information. Personal information may only be used for the purposes allowed by the *Privacy Act*, and may only be disclosed in accordance with the legislation. This Act complements other departmental legislation and procedures for the collection, use and disclosure of personal information.

Veterans and their families entrust us with their personal information every time they apply for and access our programs, services, and benefits. Protecting their personal information is a priority and we are committed to the proper handling and use of this information.

Our report on the administration of the *Privacy Act* provides a summary of our activities and performance during the period from April 1, 2023, to March 31, 2024, and includes an interpretation and explanation of the performance data found in our statistical reports to the Treasury Board of Canada Secretariat (TBS).

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

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

About Veterans Affairs Canada

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

The *Department of Veterans Affairs Act* provides authority to the Minister of Veterans Affairs to administer Acts of Parliament and orders in council, as are not by law assigned to any other federal department or any Minister, for the care, treatment and re-establishment in civil life of Veterans and the care of their dependents and survivors, and such other matters as the Governor in Council may assign.

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

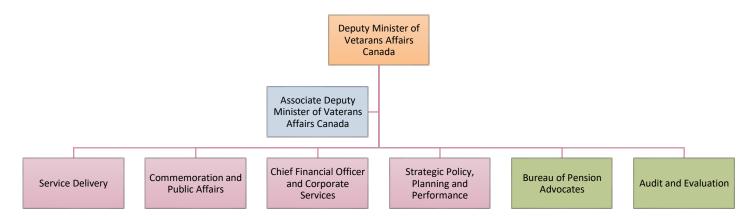
- **Provide** leadership as a champion of Veterans, and administer and coordinate needed benefits and services, whether through the Government of Canada or in partnership with provincial and community programs and non-governmental organizations.
- **Help** Veterans access the supports and services they need from all levels of government and the community at large, and maintain a leadership role in the care and support of all Veterans and their families.
- **Listen** to the suggestions of Veterans, their representatives, and stakeholders to guide work and research, and strive to design and deliver programs that meet the modern and changing needs of Veterans and their families.
- Engage Canadians of all ages in paying tribute to Veterans and those who died in service, ensuring
 that the legacy of their tremendous contributions to peace and freedom is preserved for generations
 to come.

Our department fulfills its mandate through the delivery of programs such as disability benefits, financial benefits, rehabilitation, pension advocacy, education, and training supports. The Department also works to commemorate the achievements and sacrifices of Canadians during periods of war, military conflict, and peace. We serve a highly diverse group, reflecting the remarkable breadth of Canada's contributions to world peace.

The Veterans Affairs Portfolio consists of:

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



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

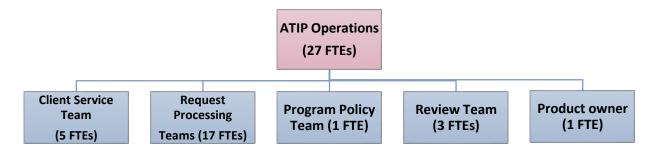
The Access to Information and Privacy Office

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

The ATIP Office administers both the *Access to Information Act* and the *Privacy Act*, and is situated in Charlottetown, Prince Edward Island. The Director of Privacy and Information Management is the head of the Office and serves as the Department's ATIP Coordinator. There are four units in Privacy and Information Management whose works relates to information management (IM) and access to information and privacy - ATIP Operations, Privacy and IM Policy, IM Operations, and IM Projects.

The Privacy and Information Management Policy unit provides training, guidance, and recommendations on privacy and IM. This unit coordinates privacy impact assessments, privacy breach investigations, complaints from the Office of the Privacy Commissioner and works with all areas of the Department on various initiatives and new programs to ensure privacy and IM considerations are included (9 FTEs).

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



The Client Service team receives the ATIP request from the public and consultation requests from other government departments. This team consults with employees to obtain and retrieve documents required to process ATIP requests, imports and scans the retrieved documents, and provides the requestor with the release package.

The Request Processing Teams are responsible for processing formal and informal requests for personal information and government information, completing consults with other government departments and third parties, and resolving complaints from oversight bodies, namely the Office of the Information Commissioner and the Office of the Privacy Commissioner. They also carry out the ATIP function for order paper questions.

ATIP Operations has piloted a three person Review Team during the reporting period. This team reviews both privacy and access to information requests, and also documents for proactive publication.

The Program Policy Team provides strategic functional advice, guidance, and support (i.e., writing procedure manuals, process maps, forms, letters) for ATIP Operations, VAC management and VAC employees.

The ATIP Operations team also includes a Product Owner. The Product Owner is working with a vendor and VAC's IT Department to implement new redaction processing software with the goal of launching 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 73.1 of the *Privacy Act*.

Delegation orders

The responsibilities for administering the *Privacy Act* are delegated by the Minister of Veterans Affairs to VAC officials through a delegation order. Treasury Board of Canada Secretariat (TBS) has recommended that government institutions draft orders that are relevant to the size, the mandate and the culture of their institution. As such, VAC's delegation orders reflect our organizational structure and the nature of our work. Authorities have been given to a number of leadership positions in our Department, including the Deputy Minister, the Assistant Deputy Minister of Corporate Services, the Director General of Information Technology, Information Management, Administration, and Privacy Division, and the Director of Privacy and Information Management.

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

Performance

Veterans Affairs Canada's Statistical Report on the Privacy Act is included in Annex A of this Report.

The privacy processing team is responsible for processing requests for personal information. This team has one team lead, and eight processing officers who process formal and informal requests for personal information. What follows is an overview of key data on our Department's performance for 2023-2024.

Between April 1, 2023 and March 31, 2024, Veterans Affairs Canada received 2820 requests under the *Privacy Act*. There were 201 requests carried forward from previous reporting periods, for a total of 3021 active requests in the 2023-2024 reporting period.

Veterans Affairs Canada closed 2694 requests and carried 327 requests to the next reporting period, of those, 291 requests were within the legislated timeline and 36 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.

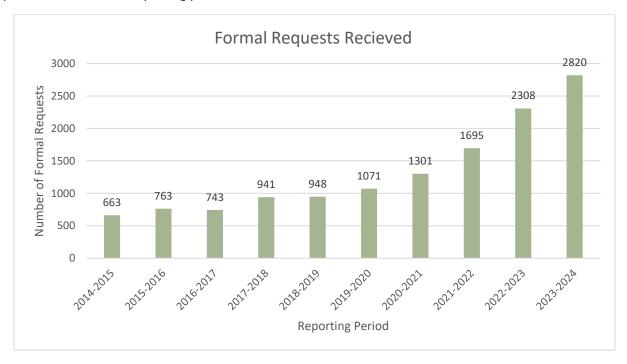
Type of request	Requests closed during	Pages processed	Pages disclosed
	the reporting period		
Formal	2694	483,901	472,144
Informal	44	5,687	5,687
Total	2738	489,588	477,831

Formal Requests

A formal request is a written request made under the *Privacy Act* to the government institution that controls the record. There is no application fee and the Department has 30 calendar days to respond. If extensions are required, applicants are notified in writing. The majority of requests are from Veterans seeking the records that VAC holds such as details of their applications, medical records and complete file.

The number of formal requests received has been steadily increasing for many years, but more recently has shown a steeper increase with the number of cases more than doubling in the last four years with an average increase of 28% per year, a total increase of 117% over the same four year time period.

The following chart illustrates the number of formal requests received from the 2013-2014 reporting period to the current reporting period.



The following chart provides detailed information on formal privacy requests from 2018-2019 reporting period to the current reporting period.

Fiscal year	Requests received	Requests carried forward from previous year	Total caseload	Requests closed	Pages processed	Pages disclosed	Requests carried forward
2023-24	2820	201	3021	2694	483,901	472,144	327
2022-23	2308	149	2457	2256	357,910	356,484	201
2021-22	1695	196	1891	1742	439,405	437,099	149
2020-21	1301	181	1482	1286	360,409	291,782	196
2019-20	1071	120	1191	1010	345,767	285,797	181
2018-19	948	93	1041	922	289,348	245,377	119

The number of pages processed increased 35% from the last reporting period, and has increased 67% since the 2018-19 reporting period.

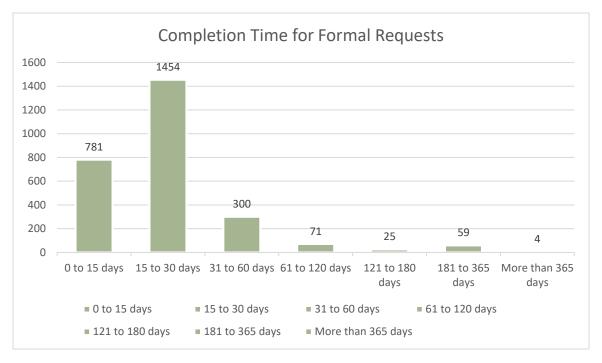
The following graph shows of number of pages reviewed and disclosed from the 2018-2019 reporting period to the current reporting period.



Completion times

We closed 2442 requests (91%) within the legislated timeline, which is a slight improvement from last year in which our completion rate was 89%. We had 252 requests that were closed past the legislated timeline. The reasons for the past due requests included interference with operations/workload (179), external consultation (2) and other (71). Completion times were impacted by a labour dispute, and our effort to reduce the backlog.





Active Requests

On the last day of the reporting period there were 327 active request, 291 (89%) of which were within the legislated timelines, and 36 (11%) beyond the legislated timelines.

Informal Requests

During the reporting period we received 53 informal privacy requests and carried five requests forward from previous reporting periods for a total of 58 active requests during the reporting period. We closed 44 informal requests, disclosing 5,687 pages. We carried 14 requests over to the next reporting period.

Complaints

During the reporting period we received 10 complaints. On the last day of reporting, there were 15 open complaints, broken down in the following chart by the fiscal year in which they were received.

Fiscal Year Open Complaints	2019-20	2020-21	2021-22	2022-23	2023-24	Total
were received						
Number of Open Complaints	3	1	2	3	6	15

Extensions

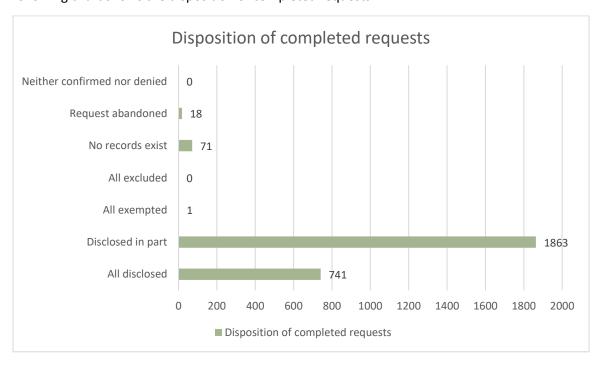
During the reporting period we took extension on only 11% of our requests or 247 extensions. The majority of these, 229, being for a large volume of pages. There were 14 extended because of a large volume of requests and four because translations were required. All of the extensions were for 16 to 30 days. Under the *Privacy Act* the maximum extension is 30 days, regardless of the size of the request.

Consultations Received from Other Government of Canada Institutions and Organizations

VAC did not receive any requests for consultations from other government institutions or organizations during the reporting period.

Disposition of requests

Of the closed requests, 741 (28%) were disclosed in full, and 1863 (69%) were disclosed in part. The following chart shows the disposition of completed requests.



Training and Awareness

Advice and Guidance

The Privacy and Information Management Policy Unit provides a wide range of advice and guidance to the departmental, as well as service partners. This advice and guidance can include, but not limited to, best practices, considerations, and advice for processing ATIP requests; for how to avoid privacy breaches; and, for how personal information is used, collected, retained and disclosed in VAC's daily operations of providing benefits and services to our clients.

The Privacy and Information Management Policy Unit also provides interpretation of the Acts to ensure the timely and effective processing of all requests received by VAC. The Unit also supports various

initiatives through the department through regular consultation with stakeholders, ensuring that stakeholders understand the importance of privacy and information management, but also explaining the risks in what is being considered and how those risks can be mitigated.

In addition, the Program Policy Team in ATIP Operations provides strategic functional advice, guidance, and support (i.e., writing procedure manuals, process maps, forms, letters) for ATIP Operations, VAC management and VAC employees on retrievals, exemptions and exclusions.

Training

During the reporting period, a full-time training position was created within the Privacy and Information Management directorate. This dedicated resource was brought on to:

- Increase the delivery of privacy, ATIP and information management training within the Privacy and Information Management directorate and to employees throughout the department;
- Begin development of a training plan, specific to privacy, information management and open government, for delivery the Privacy and Information Management directorate;
- Begin development of a training plan, specific to VAC employees, to raise awareness and education about privacy and access requests, right to know, need to know and avoiding a privacy breach;
- 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 2023-2024, the Privacy and Information Management directorate delivered Privacy and Privacy Breach awareness training sessions to 371 employees and service delivery partners. These customized sessions focused on promoting awareness of VAC's Privacy and Information Management Directorate role, explaining the legislative framework, defining what "personal information" means, familiarizing participants with Personal Information Banks, reinforcing the "need to know" principle, reviewing consent and when it is needed, and lastly, providing guidance on what privacy breaches are and best practices to avoid them.

Slides have also been added to the ATIP 101 training to ensure that all employees and service partners understand their responsibilities related to privacy and privacy breach reporting. As a result, an additional 587 employees received privacy training, bringing the total number of VAC employees and partners trained in privacy to 958. This amounts to more than a quarter of VAC's 3660 employees.

Additional Training

Throughout the year, awareness campaigns were delivered to inform employees and service delivery partners about their privacy responsibilities and to provide tips to avoid a privacy breach. Two internal feature stories reinforced best practices to protect privacy within the government.

Beginning in November 2023, Privacy and Information Management Learning Moments were delivered to all VAC employees, via a weekly newsletter, sharing best practices and tips to protect privacy, raise awareness about ATIP and Information Management.

In addition to the above noted training, privacy and information management topics are included as part of the security training required for all newly issued or renewal of employee security ID badges.

Cultural Competencies

As part of the TBS Privacy Implementation Notice 2023-01, Advancing Reconciliation with Indigenous Peoples by Providing Culturally Appropriate Services, all ATIP staff were required to participate in 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 has achieved full compliance as all identified employees have completed the requested courses, including:

- 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)

Looking forward in training

In 2024-2025, the internal and departmental Privacy and Information Management training plans will be completed, and implementation will begin.

In 2024-2025, the Privacy and Information Management directorate will continue to build their cultural competencies and take steps towards Reconciliation by further completing recommended training outlined in the Privacy Implementation Notice 2023-01.

An extensive review of the ATIP Information pages on VAC's internal website have been undertaken and updates will continue to be posted.

Policies, Guidelines, and Procedures

We continue to work on aligning our internal processes with the updated TBS instruments, and modernizing our outdated tools.

Some highlights of the improvements we made to our ATIP program that resulted from this work include:

- eliminating the back and forth between our client services and privacy processing teams by
 having all documents retrieved imported into our redaction software before assigning a file to
 an officer. The privacy processing team can now more easily manage the distribution of files and
 total workload;
- updating our Client Service Delivery Network (CSDN) codes, for added clarity in our audit trails;

- issuing monthly bulletins for ATIP Operations staff that contain important information about their work, upcoming ATIP Community Events and other practical and useful information related to working in the ATIP field; and
- writing guidance materials for all VAC employees on how to respond to ATIP requests to be published on our internal VAC@work website in the 2024-2025 fiscal year.

We will continue to build on this work in with the goal of aligning our tools with the updated TBS instruments, and modernizing our outdated internal processes.

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 meetings. With geographical and cost barriers no longer an issue thanks to technological advancements, we were able to:

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

Government-wide collaboration is now easier than ever, 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 are working to increase awareness in our Department surrounding the need for, and importance of, applying an ATIP lens to program design work. This means we identify the business and contract requirements for ATIP (e.g. how are we going to retrieve within a business system or from a contractor) in the design of new departmental programs, initiatives, contracts and business systems. We highlight the importance to program areas of identifying ATIP requirements at the front end in order to reduce, and possibly eliminate risks. It also helps to ensure that the most appropriate mitigation measures and strategies are put in place before implementation.

During the reporting period, ATIP Operations and the The Privacy and Information Management Policy unit had the opportunity to:

- Participate in a working group on the use of SharePoint as a new business solution;
- Provide support and recommendations to contract administration on critical ATIP considerations and requirements for contracts;
- Participate in VAC's IT Modernization project;
- Update the Privacy Impact Assessment Needs Determination to identify the risks and how to mitigate those risks; and
- Update the Privacy Impact Assessment (PIA) template for VAC's use ahead of TBS's PIA Directive.

Our involvement in these initiatives means we are able to contribute an ATIP perspective at the front end which helps identify potential "issues" and areas for further exploration and consideration. We are also increasing awareness of IM-by-design throughout the department which will support ATIP moving forward.

Experimenting with new tools

We have acquired and are configuring the new software, ATIPXpress, with the goal of implementing it in 2025.

Working with internal clients

The ATIP Office provides services to several internal clients including Human Resources, and Service Delivery. We review many documents for sensitivities based on the intent of the Act. During the reporting period, we had 170 requests from internal clients for the ATIP Office to review documents for sensitivities. The nature of these documents included such things as identifying concerns related to personal information. During the reporting period, we reviewed a total of 4,246 pages.

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

Our Information Management Team has been working on a project called CAPOW, Consolidating all Personal Organizational Workspaces.

Currently, there are multiple personal storage spaces available to users:

- H Drive
- Windows Desktop & Documents folders
- GCdocs personal workspace, "My Workspace"
- OneNote
- OneDrive*

These spaces are unmanaged, meaning:

- Difficult to search
- Users are not clear on what should be stored where and when
- No constraints on amount of content

In early 2024, we promoted clean-up of personal workspaces, and have started to move the contents of employees H Drive to OneDrive. The next phase will be the transition of Desktop & Documents folders, and then our GCdocs personal workspaces. The goal of the CAPOW project is to have one space that has an improved user experience, a storage quota and search capabilities. With this consolidation of information we hope for more efficient and effective ATIP retrievals.

Acquiring new Processing Software

The ATIP Office uses the AccessPro Case Management (APCM) system and the AccessPro Redaction (APR) system to process access to information and privacy requests. The current version that is in use is outdated and will be unsupported by June 2026. For this reason, we have secured funding to move forward with acquiring a new software solution, approved by TBS. We have acquired and are configuring the new software, ATIPXpress, with the goal of implementing it in 2025.

Summary of Key Issues and Actions Taken on Complaints

During the reporting period we received 10 complaints, and six of those remain open. During the reporting period four complaints were closed in early resolution, three were not well founded, one was discontinued and two were well founded.

We continue to work closely with the Office of the Privacy Commissioner to resolve the remaining open complaints.

Material Privacy Breaches

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

During the 2023-2024 fiscal year, we had no material privacy breaches to report to TBS, and the OPC.

We had a total of 101 non-material privacy breaches. VAC treats every breach as a serious matter and requires employees to report privacy incidents as soon as possible. In accordance with the Treasury Board Secretariat Directive on Privacy Practices and the Guidelines for Privacy Breaches, VAC reports only material privacy breaches to the OPC and TBS. VAC's practice is consistent with other government institutions and Treasury Board Secretariat guidance.

Privacy Impact Assessments

VAC did not complete any Privacy Impact Assessments during the reporting period.

Public Interest Disclosures

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

Monitoring Compliance

We produce monthly reports to monitor our performance on the administration of the Act. These reports include data on timeliness for the retrieval of records, number of closed cases, and number of cases and pages disclosed. We also use a Dashboard that was successfully implemented in 2021-2022. This dashboard allows for the fulsome view of key operational data that has both an internal interface for the ATIP Office and an external interface for VAC senior management.

The internal dashboard interface provides the ATIP Coordinator, ATIP manager and team leaders with workload management data (e.g., number of pages processed by Officer, number of requests in review, etc.) which allows them to track and review the status of requests more accurately. As such, they are able to better monitor deadlines, allocate resources and escalate outstanding retrievals – all key components of effective workload management.

The purpose of the dashboard's external interface is to ensure that VAC senior management are up to date on the status of retrievals and the overall progress of processing requests. We have found the Dashboard to be a useful reporting tool and are continuously working with the IT team to make improvements to ensure optimal reporting.

We also have a full-time position devoted to reporting and data management. This role brings capacity to ATIP Operations by generating more timely and complex data, monitoring, and identifying trends in the types of information being requested to identifying opportunities for making information available by other means, capturing accurate historical data, performing quality control evaluations, and reviewing critical performance measures from year to year.

All these reporting practices have been implemented to help improve completion times and meet legislative requirements.

Closing Remarks

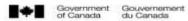
The 2023-2024 fiscal year was a productive year for VAC's ATIP Operations teams. The privacy processing continues to become more efficient each year, processing more than 125,000 additional pages over the previous year, and closing more than 400 additional cases. We're looking closely at the trend of increasing requests, with our numbers growing 163% over the last five years. With these increasing numbers it's clear we need to innovative to meet our legislative requirements.

We will continue to look at our challenges and find opportunities for improvement. In 2024-2025 we are committed to:

- Develop and implement internal and departmental training plans
- Advance reconciliation with Indigenous Services
- Update intranet pages to assist employees with processing ATIP requests
- Aligning our internal processes with TBS's updated instruments
- Continue the implementation of new redaction software to increase efficiency in processing ATIP requests

The ATIP Operations team is also supporting departmental programs and sharing its expertise in support of other initiatives that fall outside of the requirements of the *Access to Information Act* and *Privacy Act*.

Annex A – Statistical Report on the *Privacy Act*



Statistical Report on the Privacy Act

Name of institution: Veterans Affairs Canada

Reporting period: 2023/04/01 to 2024/03/31

Section 1: Requests Under the Privacy Act

1.1 Number of requests received

		Number of Requests
Received during reporting period	2820	
Outstanding from previous reporting periods		201
 Outstanding from previous reporting period 	200	
 Outstanding from more than one reporting period 	1	
Total		3021
Closed during reporting period		2694
Carried over to next reporting period		327
Carried over within legislated timeline	291	
 Carried over beyond legislated timeline 	36	

1.2 Channels of requests

Source	Number of Requests
Online	698
E-mail	2023
Mail	85
In person	0
Phone	3
Fax	11
Total	2820

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests	
Received during reporting period	53		
Outstanding from previous reporting periods	m previous reporting periods		
 Outstanding from previous reporting period 	5		
 Outstanding from more than one reporting period 	0		
Total		58	
Closed during reporting period		44	
Carried over to next reporting period		14	

2.2 Channels of informal requests

Source	Number of Requests
Online	26
E-mail	24
Mail	3
In person	0
Phone	0
Fax	0
Total	53

2.3 Completion time of informal requests

			Comple	tion 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
2	6	12	12	9	3	0	44

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1 Pages R	555	1001-5000 Pages Released		More Th Pages R	
Number of Requests		Number of Requests							
33	466	7	1761	2	1257	2	2203	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

	Completion Time									
Disposition of Requests	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		
All disclosed	299	377	56	5	2	2	0	741		
Disclosed in part	444	1035	237	64	23	56	4	1863		
All exempted	0	0	0	1	0	0	0	- 1		
All excluded	0	0	0	0	0	0	0	0		
No records exist	26	38	6	1	0	0	0	71		
Request abandoned	12	4	1	0	0	1	0	18		
Neither confirmed nor denied	0	0	0	0	0	0	0	0		
Total	781	1454	300	71	25	59	4	2694		

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	7
19(1)(e)	0	22(2)	0	26	1869
19(1)(f)	0	22.1	0	27	9
20	0	22.2	0	27.1	0
21	0	22.3	0	28	3
		22.4	0		•

3.3 Exclusions

	Number of		Number of		Number of
Section	Requests	Section	Requests	Section	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	E-record	Data set	Video	Audio	Other
896	1708	0	1	10	0

3.5 Complexity

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

Numb	er of Pages	Processed	Number of Pages Disclosed	Number of Requests
	48390	1	472144	2623

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

	Less Th		100-500 501-1000 Pages Processed Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed			
Disposition	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	705	13412	31	6046	3	1879	2	2380	0	0
Disclosed in part	1336	43495	301	67966	90	66273	132	235311	4	34073
All exempted	0	0	1	112	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	16	63	0	0	1	1987	0	0	1	10904
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2057	56970	333	74124	94	70139	134	237691	5	44977

3.5.3 Relevant minutes processed and disclosed for audio formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
284	284	10

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

	Less than 60 Minutes	processed	60-120 Minutes processed		More than 120 Minutes processed	
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	9	194	1	90	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	9	194	1	90	0	0

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
16	16	1

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

	Less than 60 Minutes	than 60 Minutes processed 60-120 Minutes processed		More than 120 Minutes processed		
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	1	16	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	1	16	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	(f)
Disclosed in part	2	2	0	0	4
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	3	2	0	0	5

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	2442
Percentage of requests closed within legislated timelines (%)	90.64587973

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

	Principal Reason				
Number of requests closed past the legislated timelines	operations / Workload	External Consultation	Internal Consultation	Other	
252	179	2	0	71	

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	66	12	78
16 to 30 days	40	16	56
31 to 60 days	14	12	26
61 to 120 days	10	16	26
121 to 180 days	3	23	26
181 to 365 days	6	31	37
More than 365 days	3	0	3
Total	142	110	252

3.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	1	0	1
Total	1	0	1

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total	
4	0	0	4	

Section 5: Requests for Correction of Personal Information and Notations

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

Section 6: Extensions

6.1 Reasons for extensions

	1	e with operations		15 (a)(ii) Consultation				
	Further review							15(b)
	required to				Cabinet			Translation
	determine	Large volume of	Large volume of	Documents are	ConfidenceSection			purposes or
Number of extensions taken	exemptions	pages	requests	difficult to obtain	(Section 70)	External	Internal	conversion
247	0	229	14	0	0	0	0	4

6.2 Length of extensions

		15(a)(i) Interference	e with operations		15 (a)(ii			
	Further review							15(b)
	required to				Cabinet			Translation
	determine	Large volume of	Large volume of	Documents are	ConfidenceSection			purposes or
Length of Extensions	exemptions	pages	requests	difficult to obtain	(Section 70)	External	Internal	conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	229	14	0	0	0	0	2
31 days or greater								2
Total	0	229	14	0	0	0	0	4

Section 7: Consultations Received From Other Institutions and Organizations

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

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

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

	Nu	ımber of [ays Requi	red to Co	omplete Co	nsultation	n Reques	sts
						484.	More	
	04-45	16 to 30	24 4 20	61 to 120	404 4-	181 to	Than	
Recommendation	0 to 15 Days	Days	31 to 60 Days	Days	121 to 180 Days	365 Days	365 Days	Total
Disclose entirely	_		_	_			-	_
	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

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

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

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

	Fewer TI Pages Pr		100-500 Proce		501-10 Pages Pro		1001- Pages Pr			nan 5000 Processed
Number of Days	Number of Requests	Pages Disclosed								
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

8.2 Requests with Privy Council Office

	Fewer Ti Pages Pr		100-500 Proce		501-1 Pages Pro		1001- Pages Pr			nan 5000 Processed
Number of Days	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
10	0	4	0	14

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

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

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	0
Number of material privacy breaches reported to OPC	0

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	101

Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries		\$2,388,937
Overtime		\$28,774
Goods and Services		\$147,479
Professional services contracts \$0		
- Other \$147,479		
Total		\$2,565,190

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	26.939
Part-time and casual employees	1.013
Regional staff	0.000
Consultants and agency personnel	0.000
Students	1.185
Total	29.137

Note: Enter values to three decimal places.

Annex B – Delegation Order



Anciens Combattants Canada

Access to Information Act Delegation Order

Loi sur l'accès à l'information

Ordonnance de délégation

This designation replaces all previous delegation orders.

under the provisions of the Access to

Information Act as set out in the

Delegation Order.

I, Lawrence MacAulay, Minister of Veterans

Information Act, the officers or employees

positions set out in the attached Delegation

Orders to exercise or perform the powers,

duties, or functions that have been given

to me as head of a government institution

of Veterans Affairs Canada who hold the

Affairs Canada, do hereby delegate,

pursuant to section 95 of the Access to

Je soussigné, Lawrence MacAulay, ministre d'Anciens Combattants Canada, délègue par la présente, conformément à l'article 95 de la Loi sur l'accès à l'information, les dirigeants ou les employés d'Anciens Combattants Canada qui occupent les postes indiqués dans les Ordonnances de délégation 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 l'accès à l'information, comme indiqué

Cette désignation remplace tous les arrêtés de délégation antérieurs.

dans Ordonnance de délégation.

The Minister of Veterans Affairs Canada Ministre, Anciens Combattants Canada

Laurence M Deday

Lawrence MacAulay Minister of Veterans Affairs Ministère des Anciens Combattants

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



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)	 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)	 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)	 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)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

Record of disclosures to be retained	9(1)	 Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Directors General Director, Privacy and Information Management
Notification of the Privacy Commissioner of any new consistent uses of personal information and ensure use is included in next statement of consistent uses set forth in the Index	9(4)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy
Personal information to be included in personal information banks	10	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Notice where access requested	14	 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	 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	 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)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy Officer, Access to Information and Privacy
Decision on whether to convert personal information to an alternate format	17(3)(b)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy
Decision to refuse to disclose personal information contained in an exempt bank	18(2)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy
Exemption - Personal information obtained in confidence	19(1)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy

Exemption – Where authorized to disclose	19(2)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information
		 Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information that may be injurious to federal-provincial affairs	20	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information that may be injurious to international affairs or the defence of Canada or one of its allies	21	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information prepared by an investigative body, information injurious to the enforcement of a law, or information injurious to the security of penal institutions	22	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information created for the <i>Public Servants Disclosure Protection Act</i>	22.3	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Team Leader, Access to Information and Privacy

Refuse to disclose personal information prepared by an investigative body for security clearance	23	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information that was collected by the Canadian Penitentiary Service, the National Parole Service or the National Parole Board while the individual was under sentence if the conditions in the section are met	24	 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	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information about another individual and shall refuse to disclose such information where disclosure is prohibited under section 8	26	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Refuse to disclose personal information that is subject to solicitor-client privilege	27	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy

Refuse to disclose protected information – patents and trade- marks	27.1	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
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	 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)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Provision of addition personal information to a complainant after receiving a 35(1)(b) notice	35(4)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management Manager, Access to Information and Privacy Team Leader, Access to Information and Privacy
Request that a court hearing, undertaken with respect to certain sections of the Act, be held in the National Capital Region	51(2)(b)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

Prepare annual report to Parliament 72(1)	 Deputy Minister Associate Deputy Minister Assistant Deputy Minister, Corporate Services Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
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Privacy Regulations - Delegated Authorities

Description	Section	Delegated authority
Retention of personal information requested under paragraph 8(2)(e)	7	 Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Allow examination of the documents (Reading Room)	9	 Deputy Minister Associate Deputy 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)	 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)	 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)	 Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management
Examination in presence of medical practitioner or psychologist	14	 Deputy Minister Associate Deputy Minister Assistant Deputy Ministers Director General, Information Technology, Information Management and Administration Director, Privacy and Information Management

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

Office of the Veterans Ombud Access to Information and Privacy Unit

Introduction:

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

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

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

This annual report on the administration to the *Privacy Act* describes how the Office of the Veterans Ombud fulfilled their responsibilities under the *Privacy Act* during the fiscal year April 1, 2023 to March 31, 2024. 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 <u>Veterans Bill of Rights</u>;
- 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, Legal Advisor, and Director – Veterans Intervention Services have full authority for the OVO to exercise the powers, duties, and functions of the Minister as the Head of Veterans Affairs under the provisions of the *Acts* and related regulations. Although four positions have been delegated full authority, the Director – Veterans Intervention Services is responsible for management of the Access to Information and Privacy Unit function within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both acts are met. Processing of requests is centralized within the unit. The Unit consists of the Director - Veterans Intervention Services, 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 2023-24 reporting period, which represents 0.3 of an FTE.

The main activities of the OVO ATIP Unit include:

- Processing OVO requests for information submitted under the Access to Information Act and
 The Privacy Act, including consulting with other federal departments and third parties with
 respect to ATIP requests received;
- Developing OVO policies, procedures, guidelines and processes in support of Access to Information and Privacy and central agency requirements;
- Monitoring legislative and regulatory changes that impact ATIP;
- Providing awareness and training on ATIP to ensure that OVO employees understand their roles and responsibilities;
- Monitoring OVO compliance with both acts, regulations and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament on the administration of the Acts;
- Leading the development of Privacy Impact Assessments (PIAs) for the OVO;
- Working closely with VAC for the resolution of any complaints against OVO which have been submitted to the Information Commissioner of Canada and the Privacy Commissioner of Canada;
- Providing centralized management of privacy breaches within the OVO;
- Providing advice, guidance and training to OVO staff on ATIP issues;
- Analyzing and responding to OVO privacy and access to information policy issues;
- Reviewing new and amended OVO forms and processes that impact the collection of personal information
- Developing appropriate Privacy Notice Statements for the OVO; and,
- Evaluating OVO contracts and Memoranda of Understanding.

Delegation Order:

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

Highlights of the Statistical Report 2022-23:

- 11 Privacy requests were received and were responded to within the legislated timelines
- There were no extensions of timelines
- There was no consultation with other institutions

The completed statistical report for 2023-24 is included.

Training and Awareness:

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

Policies, Guidelines, Procedures and Initiatives

The OVO continues to work on an Open Government action plan and will continue the transition to having more information available on the Open Government portal. The OVO 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 2023-24 reporting period.

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

In the 2023-24 reporting period, OVO received no complaints in relation to privacy requests. No complaints were carried over from 2022-23. The OVO had no audits or investigations concluded during the reporting period.

Monitoring Compliance:

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

Material Privacy Breaches:

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

Privacy Impact Assessments:

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

Public Interest Disclosures:

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

Cost to operate program: \$25,500



Statistical Report on the Privacy Act

Name of institution: Office of the Veterans Ombud

Reporting period: 2023/04/01 to 2024/03/31

Section 1: Requests Under the Privacy Act

1.1 Number of requests received

		Number of Requests
Received during reporting period		11
Outstanding from previous reporting periods	0	
 Outstanding from previous reporting period 	0	
 Outstanding from more than one reporting period 	0	
Total		11
Closed during reporting period		11
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	7
E-mail	3
Mail	1
In person	0
Phone	0
Fax	0
Total	11

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests		
Received during reporting period	1			
Outstanding from previous reporting periods	0			
 Outstanding from previous reporting period 	0			
 Outstanding from more than one reporting period 				
Total		1		
Closed during reporting period		1		
Carried over to next reporting period				

2.2 Channels of informal requests

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

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	
1	0	0	0	0	0	0	1	

2.4 Pages released informally

	Less Than 100 Pages Released		500 eleased	501-1000 Pages Released		1001-5000 Pages Released		More The Pages R	
Number of Requests		Number of Requests		Number of Requests		Number of Requests		Number of Requests	Pages Released
1	0	0	0	0	0	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

		Completion Time							
Disposition of Requests	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	
All disclosed	0	0	0	0	0	0	0	0	
Disclosed in part	4	0	1	0	0	0	0	5	
All exempted	0	0	0	0	0	0	0	0	
All excluded	0	0	0	0	0	0	0	0	
No records exist	6	0	0	0	0	0	0	6	
Request abandoned	0	0	0	0	0	0	0	0	
Neither confirmed nor denied	0	0	0	0	0	0	0	0	
Total	10	0	1	0	0	0	0	- 11	

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)		22(2)	0	26	5
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
	•	22.4	0		

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

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
1623	1623	5

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

	Less Th Pages Pr		100- Pages Pr	-500 501-1000 rocessed Pages Proces				More Than 5000 Pages Processed		
Disposition	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	2	96	2	688	1	839	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2	96	2	688	1	839	0	0	0	0

3.5.3 Relevant minutes processed and disclosed for audio formats

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

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

	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	Q	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	ø	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

	Less than 60 Missues processed		60-120 Minutes processed		More than 120 Minutes processed	
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	i a	0	0	0	0	0
Disclosed in part	0	0	0	0	٥	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	D	o

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	11
Percentage of requests closed within legislated timelines (%)	100

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

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

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

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

3.8 Requests for translation

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

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

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

Section 5: Requests for Correction of Personal Information and Notations

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

Section 6: Extensions

6.1 Reasons for extensions

		15(a)(i) Interference	e with operations		15 (a)(i	99000		
Number of extensions taken	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet ConfidenceSection (Section 70)	Exernal	Internal	15(b) Translation purposes o conversion
1	0		0	0	0	0	0	0

6.2 Length of extensions

	10	15(a)(i) Interference	e with operations	15 (a)(
Length of Extensions	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabiner ConfidenceSection (Section 70)	External	Internal	15(b) Translation purposes or conversion
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	

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

	N	umber of	Days Requi	red to Co	mplete Co	nsultation	Reques	ts
Recommendation	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to	181 to 365 Days	More Than 365 Days	Total
Disclose entirely	0	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

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

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

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

8.2 Requests with Privy Council Office

	Fewer Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 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	ĺ
Number of material privacy breaches reported to OPC	0	ĺ

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	0

Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries	\$39,840	
Overtime		\$0
Goods and Services		\$0
Professional services contracts	\$0	
Other	\$0	Ţ
Total		\$39,840

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.480
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	0.480

Note: Enter values to three decimal places.