



Annual Report to Parliament on the Administration of the Access to Information **Act** 2017-18



Powering Technology for the Government of Canada

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Introduction

Access to Information Act

The <u>Access to Information Act</u> came into effect on July 1, 1983, giving the public a right of access to information contained in government records, subject to certain specific and limited exceptions.

Section 72 of the <u>Access to Information Act</u> (the Act) requires that the head of every government institution submit an annual report to Parliament on the administration of the Act within the institution for the past fiscal year. It is under this provision that the present annual report is tabled in Parliament.

The present annual report describes how Shared Services Canada administered the <u>Access to Information Act</u> for the period from April 1, 2017 to March 31, 2018.

Institutional Mandate and Organization

Shared Services Canada (SSC) was created on August 4, 2011 to transform how the Government of Canada manages its information technology (IT) infrastructure. SSC delivers email, data centre, network and workplace technology device services to departments and agencies in a consolidated and standardized manner to support the delivery of Government of Canada programs and services. With a whole-of-government approach to IT infrastructure services, SSC is generating economies of scale to deliver more efficient, reliable and secure IT infrastructure services. SSC also provides certain optional technology services to other organizations on a cost-recovery basis.

The <u>Shared Services Canada Act</u> recognizes that the Government of Canada wishes to standardize and streamline, within a single shared services entity, certain administrative services that support government institutions. Through orders-in-council (OIC), the Department received specific responsibilities in the area of IT infrastructure services.

SSC's focus is to maintain and improve IT service delivery across the Government of Canada, enhance security, and implement government-wide solutions to transform IT infrastructure to improve value for money and services to Canadians.

SSC is working with the information and communications technology sector to deliver an enterprise-wide email system, consolidate and modernize government data centres, and transform telecommunications services. Budget 2013 further expanded SSC's mandate, adding the consolidation of government-wide procurement of software and hardware for workplace technology devices (e.g. printers, and desktop and laptop computers).

SSC contributes to the achievement of other critically important Government of Canada initiatives, including border security, benefit payments and weather forecasting, as well as the vision of the future public service as articulated in Blueprint 2020. In addition, SSC works collaboratively with Government of Canada cyber security agencies to improve cyber and IT security.

As of September 1, 2015, OIC 2015-1071 provides SSC with the authority to offer any or all of its services to any federal government entity on a voluntary basis, as well as to another Canadian jurisdiction or a foreign government, as long as there are no additional costs incurred or additional resources allocated by SSC. The OIC also expands the mandatory nature of a sub-set of SSC services related to email, data centres and networks to a range of new clients. Most small departments and agencies previously not served, or served only on an optional basis, are set out as mandatory clients for this sub-set of services.

Delegated authority

In August 2015, pursuant to section 73 of the <u>Access to Information Act</u>, the President authorized the delegation instrument by reconfirming full powers, duties and functions under the Act to levels down to and including the Director of the Access to Information and Privacy (ATIP) Protection Division, hereafter referred to as the ATIP Division (see Annex B).

ATIP Division structure

During the reporting period, the ATIP Division structure remained the same as reported in previous reports, with a director and two deputy directors, each overseeing teams of analysts for the Operations side as well the Policy and Governance side. While an average of 21 person years were dedicated to the ATIP program, 15 person years were dedicated to the administration of the Access to Information Act. These person years include full-time equivalents, casual employees, students and consultants.

The Operations Team within the ATIP Division is responsible for processing requests under the Access to

Deputy Director
ATIP Operations
ATIP Operations
Policy and Governance
Policy and Governance Team

Team
Policy and Governance Team

This includes liaising with subjectw of records requested and conducting external access and the government's need to safeguard rations team provides briefings for the senior

Director of ATIP Division

Administrative Assistant

Information Act and its accompanying piece of legislation, the Privacy Act. This includes liaising with subject-matter experts within SSC, performing a line-by-line review of records requested and conducting external consultations as required to balance the public's right of access and the government's need to safeguard certain information in limited and specific cases. The Operations team provides briefings for the senior management team as required on matters relating to requests and institutional performance. This team is also the main point of contact with the Offices of the Information and Privacy Commissioners of Canada with respect to the resolution of complaints related to requests under both Acts.

The Policy and Governance team within the ATIP Division provides policy advice and guidance to SSC's senior management team on access to information and the protection of personal information. This team also develops ATIP policy instruments, processing products and tools. It is responsible for assisting program officials when they conduct privacy impact assessments (PIA) and draft personal information-sharing agreements to ensure that privacy legislation and policy requirements are respected. It also liaises with employees and prepares and delivers training and awareness sessions throughout SSC. In addition, the team coordinates SSC's annual reporting requirements and publishes SSC's Info Source chapter. Lastly, it is the main point of contact with the Offices of the Information and Privacy Commissioners of Canada with respect to various audits, reviews, systemic investigations and privacy breaches.

¹ Info Source: Sources of Federal Government and Employee Information provides information about the functions, programs, activities and related information holdings of government institutions. Pursuant to TBS's Info Source Decentralized Publishing Requirements, institutions must update their own Info Source chapter annually and publish the updated version on their anniversary; SSC's reporting month is June.

Words of recognition

The SSC ATIP Division was founded on experience and guided by service excellence. This is a testament to work and commitment by the former Acting Director General and Chief Privacy Officer (Monique McCulloch). Till her recent retirement, Monique McCulloch had been the only Director of the Access to Information and Privacy Division at SSC since its creation in August of 2011. The creation of a new federal government department is uncommon; let alone a unique IT department such as SSC.

Since her appointment as Director of ATIP, Ms. McCulloch not only built the ATIP Division from the ground up, she also led her team in the creation and implementation of instrumental policies, including five directives as well as nine accompanying standards. Together, these policies ensure the collection, use, retention, disclosure and disposal of personal information respects the Privacy Act and related policy instruments throughout the initiation, analysis, design, development, implementation and post-implementation phases of all its program or service delivery activities within SSC. The ATIP Division's success since its creation led to the division receiving the 2017 Excellence in Access to Information Award from The Chief Information Officer Council Community This award recognized Ms. McCulloch's leadership across the Government of Canada in developing and implementing Comprehensive governance and accountability relating to personal information handling practices as well as in facilitating timely access in the unique landscape of information holdings that exist between SSC and partners.

Over the course of her 35 year career, Ms. McCulloch has facilitated and changed the way the public is able to access government records as well as steadfastly adding rigor to the protection of personal information in a complex evolving IT environment. Her dedication and strong leadership, coupled with her vast experience, are truly remarkable. Ms. McCulloch retired from the federal government at the end of April. Shared Services Canada and the federal ATIP community have been most fortunate to have had such a dedicated and competent person. She will be missed and the SSC ATIP Division wish her the very best in this next stage of her life.

Dedicated to ATIP excellence

The ATIP Division is responsible for developing, coordinating, implementing and monitoring compliance with effective ATIP-related policies, guidelines, systems and procedures across SSC. This enables SSC to meet the requirements and to fulfill its obligations under the <u>Access to Information Act</u> and its accompanying piece of legislation, the <u>Privacy Act</u>.

The main activities of the ATIP Division are as follows:

- Receiving, co-ordinating and processing requests under the <u>Access to Information Act</u> and the <u>Privacy</u> Act
- Responding to consultations from other government institutions regarding SSC information under consideration for release

- Developing and maintaining SSC-specific policy instruments in support of access and privacy legislation
- Developing and delivering ATIP awareness and training across SSC so that employees and management understand their roles and responsibilities
- Supporting a network of ATIP liaison officers across SSC who assist with requests by co-ordinating the retrieval of records and recommendations from within their branch or region
- Monitoring institutional compliance with both Acts and their regulations, as well as relevant procedures and policies
- Preparing annual reports to Parliament on the administration of the Acts, as well as other material that may be required by central agencies
- Developing the <u>SSC ATIP Logic Model</u> which is a representation of how the ATIP program is intended to work and what we set out to accomplish. SSC ATIP is the first ATIP Division to accomplish this task which meets TBS Policy
- Representing SSC in dealings with the Treasury Board of Canada Secretariat (TBS) and the Offices of the Information and Privacy Commissioners of Canada regarding the application of both Acts as they relate to SSC
- Supporting SSC in meeting its commitments to openness and transparency through the proactive disclosure of information and the release of information via informal avenues, such as the Open Government portal
- Supporting the Corporate Secretariat's Business Process Transformation by simplifying the access to information request process to ensure timeliness and quality review of the information
- Monitoring ATIP tasking performance and reporting to senior management on a monthly basis; and
- Participating in whole-of-government initiatives for the federal ATIP community

The administration of the Acts by the ATIP Division is facilitated at the branch and directorate level of SSC. Each organizational branch and directorate has an ATIP Liaison Officer who coordinates the collection of requested records and information and provides guidance to branch and directorate managers on the application of the Acts.

Interpretation of the Statistical Report—Access to Information Requests and Consultations

The Statistical Report (Annex C) on the administration of the <u>Access to Information Act</u> provides a summary of the access to information requests and consultations processed during the 2017–18 reporting period.

Overview of Workload (Annex C, Part 1, Table 1.1 and Table 1.3; Part 2, Table 2.5.1; Part 5, Table 5.1)

During the reporting period, the ATIP Division received 257 formal requests under the Access to Information Act, 122 consultations from other government institutions and 167 informal requests, and carried over 23 requests from the previous reporting period.

The number of requests received under the <u>Access to Information Act</u> during this reporting period decreased slightly compared to the previous reporting period (in which 278 requests had been received). Out of 109,231 pages processed by the ATIP Division, 39,958 were deemed relevant to the <u>Access to Information Act</u> requests and were either disclosed in whole or in part.

The ATIP Division ensures that it monitors on a weekly basis its turnaround times in processing requests and tracks the timeliness of their completion. Performance reports are communicated to senior management on a monthly basis. In this reporting period, only two <u>Access to Information Act</u> requests were not completed within legislated timelines.

Requests Received (Annex C, Part 1, Table 1.1)

During this reporting period, 257 requests were received under the <u>Access to Information Act</u>. In addition, 23 requests from the previous reporting period were carried forward, for a total of 280 requests requiring action, which represents a 9% decrease from the previous reporting period.

Source of Requests Received (Annex C, Part 1, Table 1.2)

The largest portion of the requests received during the reporting period originated from the public, representing 37% of the requests received. The media represented 35,5% of the requests received, whereas those from the private sector and sources that declined to identify themselves accounted for 16% and 11% of the requests received, respectively. Requests from organizations and academic sources represented 0.5%.

Disposition of Requests Completed (Annex C, Part 2, Table 2.1)

During the reporting period, the requests processed under the <u>Access to Information Act</u> (not including transferred or abandoned requests) saw full or partial disclosure of the information 72% of the time. Requests for which the responsive records were entirely exempted represented only 2% of all requests processed. For the remaining requests, 22% were either abandoned or yielded no relevant record and 4% were transferred to other government institutions.

Completion Time (Annex C, Part 2, Table 2.1)

The Access to Information Act establishes the timelines for responding to access to information requests. In addition, it also allows for extensions in cases where responding to the request requires the review of a large volume of information or extensive consultations with other government institutions or other third parties. During the current reporting period, 56% of the requests were closed within the 30-day deadline established by the Act and 43% were closed within an extended deadline permissible under subsection 9(1) of the Act. Less than 1% of the requests closed in the reporting period were in deemed refusal, meaning that the legislative due date was not met.

Exemptions Invoked (Annex C, Part 2, Table 2.1 and Table 2.2)

Whenever SSC invoked exempting provisions, the principle of severing, as described in section 25 of the Act, was applied in order to release as much information as possible. In fact, there were only four requests that needed to be exempted in their entirety.

The most frequently invoked exempting provisions for SSC were under paragraph 16(2)(c)—Law enforcement and investigations (security); paragraph 20(1)(c)—Information that could lead to financial loss or gain of a third party; and subsection 19(1)—Personal Information. Subsection 19(1) as well as paragraph 20(1)(c) are mandatory exemptions, whereas paragraph 16(2)(c) is a discretionary exemption.

Exclusions Cited (Annex C, Part 2, Table 2.3)

The exclusion provision used most frequently was in relation to the protection of Confidences of Cabinet, specifically under paragraph 69(1)(g)——Information that Relates to Memoranda to Cabinet.

Extensions (Annex C, Part 2, Table 2.1 and Part 3)

Extensions permissible under subsection 9(1) of the Act were invoked 45% of the time, an 11% increase as compared to last year. Most of these extensions were required in order to conduct consultations with other government institutions and also to reduce the risk of interference with daily operations owing to a large volume of records.

Fees (Annex C, Part 4)

During the reporting period, SSC collected \$1,080 and waived or refunded \$90 in application fees. The SSC ATIP Division did not collect funds in relation to search and preparation fees, which is in line with the <u>TBS</u> Interim Directive on the Administration of the Access to Information Act, effective as of May 5, 2016.

Consultations (Annex C, Part 5, Table 5.1)

During the reporting period, SSC received 122 consultations from other government institutions and carried over six consultations from the previous reporting period. SSC's ATIP Division completed 122 consultations during the reporting period, with six pending at the end of the reporting period.

Informal Requests (Annex C, Part 1, Table 1.3)

During the reporting period, SSC received and processed 167 informal requests for previously released documents. This represents a decrease of nearly 44% from the previous reporting period.

Costs (Annex C, Part 9, Table 9.1)

According to information provided by SSC's Finance Division in April 2018, during the reporting period the ATIP Division spent a total of \$1,372,048 for the administration of the <u>Access to Information Act</u>, of which \$1,183,056 was spent on salaries, and \$188,992 was spent on goods and services including professional service contracts.

Comparative Review

Access to In	Access to Information Act and Consultation Requests Processed						
Fiscal Year	Requests Received	Total Pages Processed					
2011–12	12	95					
2012–13	100	9,660					
2013–14	259	27,411					
2014–15	291	119,394					
2015–16	306	109,631					
2016–17	403	276,733					
2017-18	379	113,656					

Since the creation of SSC, there has been a steady increase in number of requests and volume of pages processed by the ATIP Division. Pages processed for the previous year included the closure of a large procurement-related request that accounted for 192,654 pages.

Institutional ATIP training and awareness activities

For this reporting period, the ATIP Division continued embedding and fostering a culture of ATIP excellence across SSC, with a focus on developing and delivering training and awareness activities that result in openness, transparency for avoiding obstruction of ATIP legislation, and privacy breaches.

In order to ensure that all SSC employees, regardless of their position or level, are made aware of their responsibilities related to ATIP and that they gain an in-depth understanding of the related best practices and principles, SSC launched, in collaboration with the Canada School of Public Service (CSPS), the on-line Access to Information and Privacy Fundamentals course (I015) on July 14, 2016. While this course is optional for all federal public service employees through the CSPS website, its completion has been made mandatory for all SSC employees. For this reporting period, approximately 697 SSC employees successfully completed the course I015 - Access to Information and Privacy Fundamentals.

The ATIP division operated without an ATIP training facilitator for a large portion of this reporting period, yet still successfully delivered fourteen internal training and awareness sessions, to approximately 244 participants, which included SSC Executives, Managers and employees at all levels.

In order to assess and continually improve the effectiveness of its training activities, the ATIP Division welcomed feedback directly from participants regarding their training experience. Based on the feedback received, these sessions have all been very well received and participants have indicated their high satisfaction with these sessions, which has resulted in requests for additional awareness sessions for new staff in the coming fiscal year.

It should be noted that while significant training has been delivered to ATIP Liaison Officers and subject matter experts in our offices of primary interest, ATIP Analysts working in the ATIP Division have also taken the necessary measures to continually gain new knowledge and remain informed in relation to both legislation and emerging trends. Furthermore, our ATIP Analysts have attended ATIP community meetings, conferences, and ATIP-related training sessions offered through various means, including certification training through the International Association of Privacy Professionals.

Training for the ATIP Liaison Officer Network

As the primary point of contact for a branch or directorate, an ATIP Liaison Officer must have an in-depth understanding of the ATIP process and a heightened understanding of the legislation. During this reporting period, the ATIP Division delivered two training sessions specifically tailored to our ATIP Liaison Officers and their delegates, to a total of approximately 17 participants. There were fewer participants in these sessions than in the previous reporting period, largely owing to the more extensive Liaison Officer training sessions delivered last year (to 42 participants over five sessions). It should also be noted that during this current reporting period, many ATIP Liaison Officers and their delegates, new to SSC, participated in ATIP awareness sessions targeting offices of primary interest and their subject matter experts.

During the next reporting period, the ATIP office plans to schedule a series of meetings with the liaison officers, their delegates, and office of primary interest subject matter experts to discuss specific issues in processing requests received. These meetings will enable the ATIP Division to continue to maintain and build strong working relationships with our offices of primary interest and to refine its processes in order to deliver the best service possible to its internal and external clients

ATIP Training for Subject-Matter Experts in Offices of Primary Interest

During the reporting period, the ATIP Division delivered nine office of primary interest training sessions targeting various branches within SSC: Data Centre Services, Networks and End User, Corporate Services, Audit and Evaluation and Project Management and Delivery, to a total of approximately 126 participants. Furthermore, a total of five sessions opened to all SSC subject matter experts was delivered to approximately 108 participants. A total of 14 sessions totaling 234 employees.

ATIP Awareness for SSC Executives

During this reporting period, no awareness sessions were delivered specifically to Executives, due to the fact that last reporting period two sessions were provided to SSC Executives which totaled 80 participants; however, for this reporting period, 13 SSC Executives participated in awareness sessions for our offices of primary interest and subject matter experts, which focused on general ATIP awareness and the communication of SSC ATIP policy instruments.

ATIP in the Government of Canada

The Director of SSC's ATIP Division also continues to deliver, for the CSPS, the courses entitled Access to Information in the Government of Canada (I701) and Privacy in the Government of Canada (I702), which are intended for federal public servants.

Collaboration with the ATIP Community

During the reporting period, the Director of SSC's ATIP Division presented SSC's ATIP policy instruments to participants at the Access to Information and Privacy Practitioners' Meeting. Such meetings bring together ATIP analysts from across the federal ATIP community and serve as an opportunity for the community members to exchange ideas on issues related to the field and to be updated on developing trends. SSC's ATIP policy instruments were made available to the ATIP community for other departments to leverage for their own purposes.

Info Source at SSC

Info Source is a publication that lists and describes the information holdings of all federal departments and is a reference tool that assists individuals in submitting requests.

For this reporting period, the ATIP Division developed a self-paced processing guide for each office of primary interest to use as a tool for responding to their individual Info Source chapters.

ATIP Training for GCDOCS Coaches

GCDOCS is the secure information repository used by SSC (up to Protected B). It enables employees to create, save and share documents digitally within SSC.

The ATIP Division, in collaboration with SSC's Information Management Quality Control (IMQC) team, have developed a hands-on information session on GCDOCS, which is compulsory for any potential privacy breaches that resulted from improper permissions and access restrictions to a record in GCDOCS. During this reporting period, this training served as a reminder to 68 SSC employees of the best practices related to information management and security when handling personal information and of the privacy and security considerations related to access permissions when creating, saving and sharing documents in GCDOCS — considerations to be shared within their own work groups (the "need to know" principle).

Right to Know Week

In 2017, Right to Know (RTK) Week took place from September 26 to October 2 in Canada. Initiated in Bulgaria on September 28, 2002, International Right to Know Day is intended to raise awareness of an individual's right to access government information while promoting freedom of information as an essential feature of both democracy and good governance. SSC advanced awareness of RTK Week by highlighting it in its weekly bulletin to employees.

Remaining Informed

The Policy and Governance Team of the ATIP Division conducts a media scan, on a daily basis, for any articles that may be relevant to the field of ATIP and to SSC. These scans, which are shared with the Corporate Secretariat and colleagues within Security, help employees remain aware of ongoing issues in the field and emerging trends.

ATIP Policy Instruments, Procedures and Initiatives

ATIP Management Framework

While SSC continues to revise its ATIP policy instruments as needed, during the reporting period, it also published the following five policy instruments, which were approved by the Corporate Management Board in March 2016:

- SSC ATIP Logic Model This model is a representation of how the ATIP program is intended to work and what we set out to accomplish. The model links outcomes with processes and the roles and responsibilities that govern our Division. It outlines the relationship between resources, activities and results as they relate specifically to our Division and desired outcomes. This Logic Model essentially demonstrates a concise representation of each element of the operation and the value it generates as part of a larger process.
- Performance Indicators --- The indicators were developed to monitor the efficiency with which the ATIP Division processes various requests. The statistics provide a synopsis of the actual performance relative to the established standards and guidelines. The collection of this data will assist the ATIP Division in identifying areas of improvement so as to deliver a more effective service.

Proactive Disclosures

Since the beginning of the current reporting period, SSC's ATIP Division has proactively published on a monthly basis the list of briefing notes to the President and the Minister. While not mandatory, SSC ATIP implemented this new initiative in the spirit of open government.

"Duty to Assist" Principle

The ATIP Division's process under the <u>Access to Information Act</u> is based upon the "duty to assist" principle, which is defined in the TBS <u>Interim Directive on the Administration of the Access to Information Act</u> as follows:

- 1. Process requests without regard for the identity of the applicant
- 2. Offer reasonable assistance throughout the request process
- 3. Provide information on the <u>Access to Information Act</u>, including information on the processing of requests and the right to complain to the Information Commissioner of Canada
- 4. Inform the applicant as appropriate and without undue delay when the request needs to be clarified
- 5. Make every reasonable effort to locate and retrieve the requested records under the control of the institution
- 6. Apply limited and specific exemptions to the requested records
- 7. Provide accurate and complete responses
- 8. Provide timely access to the requested information

- 9. Provide records in the format and official language requested, as appropriate
- 10. Provide an appropriate location within the institution to examine the requested information

SSC's ATIP process is further supported by best practices within the federal ATIP community, which enable SSC to meet the challenges of responding in a timely manner to <u>Access to Information Act</u> requests for access and consultations.

ATIP Process Manual

During the reporting period, the ATIP Division continued to update its procedural manual to guide ATIP staff in processing requests received under the <u>Access to Information Act</u> and its accompanying piece of legislation, the <u>Privacy Act</u>. The manual provides information about the types of documents processed and how they should be handled pursuant to the Acts. The manual serves as a reference tool for ATIP staff and is designed to ensure consistent application of the Acts and related policy instruments. Further, the manual supports SSC's "duty to assist" all applicants, so that all reasonable effort is made to help applicants receive complete, accurate and timely responses in accordance with the legislation.

SSC has developed internal procedures and guidelines to ensure appropriate monitoring of and reporting on ATIP requests, as well as compliance with TBS policies and guidelines. They provide important checks and balances required to maintain full compliance.

Control of Records and Partner Organizations

Given SSC's mandate, there are challenges surrounding the roles and responsibilities under the <u>Access to Information Act</u>. Section 15 of the <u>Shared Services Canada Act</u> states that:

...for the purposes of the <u>Access to Information Act</u>, the records of other government institutions [...] that are, on behalf of those institutions or organizations, contained in or carried on Shared Services Canada's information technology systems are not under the control of Shared Services Canada.

Given the unique relationship between SSC and its partner organizations, from time to time the partner organizations may require SSC's assistance to access their data residing on the SSC IT infrastructure. When all efforts by partners to retrieve records internally have been unsuccessful, the primary contact within SSC to facilitate partner access to their data is SSC's Security Operations Centre (SOC). The SOC's assistance may be requested in the following cases, if attempts by partner organizations have been unsuccessful:

- 1. When partners receive ATIP requests for their records (records under their control residing on the SSC IT infrastructure)
- 2. When partners are subject to court orders, subpoenas, warrants or any other binding order made by a person or body with jurisdiction to compel the production of records
- 3. When a lawful investigation (administrative or criminal) requires the retrieval of records residing on the SSC IT infrastructure

As previously indicated, the related policy has been shared on several occasions with SSC's partner organizations through various forums where SSC's Director of ATIP has given presentations on the matter. It is also available to partner organizations on SSC's Serving Government website.

Info Source Update

Info Source: Sources of Federal Government and Employee Information provides information about the functions, programs, activities and related information holdings of government institutions subject to the Access to Information Act and the Privacy Act. It provides individuals as well as current and former employees of the government with relevant information to assist them in accessing personal information about them held by government institutions subject to the Privacy Act and exercising their rights under the Privacy Act.

TBS requires that government institutions publish their own Info Source chapter on their Internet site. During the reporting period, SSC completed its review of its Info Source chapter and met all legislative and TBS mandatory requirements. In fact, SSC received notification from TBS that the 2016–17 update was deemed excellent.

Complaints and Investigations

Just prior to the end of the reporting period, SSC received a finding from the Office of the Information Commissioner of Canada (OIC) for a complaint received in 2016. SSC had claimed an extension of 540 days under paragraphs 9(1)(a) and (b) of the Act for a large volume of records requiring extensive consultations with another government department. The request concerned documentation of any incidents affecting a particular department over a period of half a year, which resulted in over 15,000 pages of records. The OIC deemed the extension complaint for 9(1)(a) well-founded, resolved. While the volume was deemed to be sufficient to warrant an extension, the OIC determined that SSC had not provided sufficient justification linking the length of the extension to unreasonable interference with operations. However, the finding also acknowledged that SSC was simultaneously processing four requests of similar volume on the same subject matter, and that SSC had made reasonable efforts with regards to duty to assist though hiring additional resources, helping the requester narrow the scope of the requests, and providing an interim release. The file was closed this reporting period with one interim release prior to the final response.

During the reporting period, the Office of the Information Commissioner of Canada notified SSC that it had received seven new complaints against SSC under section 32 of the Access to Information Act.

One of the above-mentioned complaints alleged that SSC claimed an invalid extension of time under the Act. This matter was ongoing at the end of the reporting period.

Four complaints alleged that SSC had improperly applied exemptions/exclusions, so as to unjustifiably deny access to records or portions thereof, as requested under the Act. These complaints remained open at the end of the reporting period.

One complaint alleged improper processing of a file, specifically that SSC does not have sufficient information to retrieve any relevant records. This matter was ongoing at the end of the reporting period.

Finally, one of the complaints received this period was regarding a no records response from SSC. Just before close of fiscal, SSC received notification from the Office of the Information Commissioner of Canada that the complaint had been settled by agreement of the parties. The request was related to a list of potential uses for Big Data that appears on the SSC website. With further information provided by the requester through the OIC, SSC was able to confirm that no discussion of the project of interest had occurred within the period of the request; however, SSC was able to locate the source documents that had informed the list on SSC's website. The documents were not under the control of the department at the time of the request, as they were located in a non-SSC e-mail account held by a consultant who had interrupted service with SSC. In consideration of the duty to assist, SSC disclosed these documents to the requester.

Parliamentary Affairs

During the period under review three order paper questions were placed by members of Parliament with respect to the following: contingency plans for ATIP requests processed during a postal disruption, ATIP requests received and processed within the threshold and ATIP reported privacy breaches. SSC provided its written responses. Upon request, these responses are available to the public via the Library of Parliament.

Next Steps for the Year Ahead

SSC's ATIP Division will continue to be innovative in its administration of the <u>Access to Information Act</u> and take part in SSC internal services transformation initiatives as well as federal ATIP community initiatives. The ATIP Division is committed to further supporting SSC as it instils a culture of service excellence and moves toward an efficient and modern paperless environment.

At the end of the reporting period, the ATIP Division was mapping its information holdings against SSC's 2017–18 Program Alignment Architecture. This initiative will assist in further defining SSC's information holdings for the purpose of enhancing the clarity of its Info Source chapter.

The ATIP Division will continue to foster the development of knowledge tools for the ATIP Liaison Network as well as to provide ATIP training and awareness opportunities for executives, managers and employees across the Department. Meetings will be scheduled with liaison officers, their delegates and office of primary interest subject matter experts for the purpose of discussing issues related to the processing of requests, to further awareness and refine processes. The liaison officers play a crucial role in ensuring the Department fulfills its legislative requirement. This being the case, their involvement, expertise and collaboration are invaluable.

Finally, it should also be noted that the ATIP Division has developed a Logic Model and performance measurement indicators in relation to its ATIP Management Framework and its 14 policy instruments, which consist of desired outcomes, performance indicators and targets. This exercise will enable the ATIP Division to gauge the efficacy of its policy instruments. The Logic Model was posted to the SSC Intranet in the summer of 2017.

Annex A—Partner Organizations

- 1. Agriculture and Agri-Food Canada
- 2. Atlantic Canada Opportunities Agency
- 3. Canada Border Services Agency
- 4. Canada Economic Development for Quebec Regions
- 5. Canada Revenue Agency
- 6. Canada School of Public Service
- 7. Canadian Food Inspection Agency
- 8. Canadian Heritage
- 9. Canadian Northern Economic Development Agency
- 10. Canadian Nuclear Safety Commission
- 11. Canadian Space Agency
- 12. Correctional Service Canada
- 13. Department of Finance Canada
- 14. Department of Justice Canada
- 15. Employment and Social Development Canada
- 16. Environment and Climate Change Canada
- 17. Federal Economic Development Agency for Southern Ontario
- 18. Financial Transactions and Reports Analysis Centre of Canada
- 19. Fisheries and Oceans Canada
- 20. Global Affairs Canada
- 21. Health Canada
- 22. Immigration and Refugee Board of Canada
- 23. Immigration, Refugees and Citizenship Canada
- 24. Indigenous and Northern Affairs Canada
- 25. Infrastructure Canada
- 26. Innovation, Science and Economic Development Canada
- 27. Library and Archives Canada
- 28. National Defence
- 29. National Research Council Canada
- 30. Natural Resources Canada
- 31. Parks Canada
- 32. Privy Council Office
- 33. Public Health Agency of Canada
- 34. Public Safety Canada
- 35. Public Service Commission of Canada
- 36. Public Services and Procurement Canada
- 37. Royal Canadian Mounted Police
- 38. Statistics Canada
- 39. Transport Canada
- 40. Treasury Board of Canada Secretariat
- 41. Veterans Affairs Canada
- 42. Western Economic Diversification Canada

Annex B—Delegated Authority

Access to Information Act Designation Order

The President of Shared Services Canada, pursuant to section 73 of the Access to Information Act, hereby designates the persons holding the positions set out in the schedule hereto, or the persons acting in those positions, to exercise the powers and perform the duties and functions of the President of Shared Services Canada as the head of a government institution under all sections of the Access to Information Act. This designation is effective immediately upon being signed.

SCHEDULE

- 1. Chief Operating Officer
- 2. Senior Assistant Deputy Minister and Chief Financial Officer
- 3. Corporate Secretary and Chief Privacy Officer
- 4. Director, Access to Information and Privacy Protection Division

Ron Parker

Ottawa,

Annex C—Statistical Report



Government Gouvernement of Canada du Canada

Statistical Report on the Access to Information Act

Name of institution: Shared Services Canada

Reporting period: 2017-04-01 2018-03-31 to

Part 1: Requests Under the Access to Information Act

1.1 Number of requests

	Number of Requests
Received during reporting period	257
Outstanding from previous reporting period	23
Total	280
Closed during reporting period	237
Carried over to next reporting period	43

1.2 Sources of requests

Source	Number of Requests
Media	92
Academia	0
Business (private sector)	43
Organization	1
Public	94
Decline to Identify	27
Total	257

1.3 Informal requests

	Completion Time						
1 to 15					Total		
145	22	0	0	0	0	0	167

Note: All requests previously recorded as "treated informally" will now be accounted for in this section only.



Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

	Completion Time							
Disposition of Requests	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days		181 to 365 Days	More Than 365 Days	Total
All disclosed	5	21	6	4	0	0	0	36
Disclosed in part	7	42	24	54	4	3	2	136
All exempted	0	1	2	1	0	0	0	4
All excluded	0	0	0	0	0	0	0	0
No records exist	24	8	0	0	0	0	0	32
Request transferred	10	0	0	0	0	0	0	10
Request abandoned	15	2	2	0	0	0	0	19
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	61	74	34	59	4	3	2	237

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	1	16(2)	0	18(a)	0	20.1	0
13(1)(b)	0	16(2)(a)	0	18(b)	0	20.2	0
13(1)(c)	0	16(2)(b)	1	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	71	18(d)	0	21(1)(a)	17
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	44
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	28
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	0	21(1)(d)	2
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	7
15(1)	0	16.1(1)(d)	0	19(1)	97	22.1(1)	7
15(1) - I.A.*	1	16.2(1)	0	20(1)(a)	1	23	17
15(1) - Def.*	2	16.3	0	20(1)(b)	18	24(1)	0
15(1) - S.A.*	7	16.4(1)(a)	0	20(1)(b.1)	0	26	1
16(1)(a)(i)	0	16.4(1)(b)	0	20(1)(c)	69		
16(1)(a)(ii)	0	16.5	0	20(1)(d)	7		
16(1)(a)(iii)	0	17	1			-	
16(1)(b)	0			-			
16(1)(c)	1						
16(1)(d)	0	* I.A.: Int	ternational Affa	airs Def.: Defence	of Canada	S.A.: Subversive A	ctivities

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
68(a)	4	69(1)	0	69(1)(g) re (a)	34
68(b)	0	69(1)(a)	2	69(1)(g) re (b)	0
68(c)	0	69(1)(b)	0	69(1)(g) re (c)	19
68.1	0	69(1)(c)	0	69(1)(g) re (d)	1
68.2(a)	0	69(1)(d)	4	69(1)(g) re (e)	3
68.2(b)	0	69(1)(e)	1	69(1)(g) re (f)	2
	_	69(1)(f)	0	69.1(1)	0

2.4 Format of information released

Disposition	Paper	Electronic	Other Formats
All disclosed	4	32	0
Disclosed in part	17	119	0
Total	21	151	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

	Number of Pages	Number of Pages	
Disposition of Requests	Processed	Disclosed	Number of Requests
All disclosed	10802	8935	36
Disclosed in part	85962	30023	136
All exempted	3235	0	4
All excluded	0	0	0
Request abandoned	9258	340	19
Neither confirmed nor			
denied	0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

		han 100 rocessed		101-500 Pages Processed		501-1000 1001-5000 More Than 5000 Pages Processed Pages Processed				
Disposition	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	29	358	4	740	1	196	1	9	1	7632
Disclosed in part	68	1671	38	7065	12	5240	15	11481	3	4566
All exempted	3	0	0	0	0	0	1	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	18	0	0	0	0	0	0	0	1	340
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	118	2029	42	7805	13	5436	17	11490	5	12538

2.5.3 Other complexities

Disposition	Consultation Required	Assessment of Fees	Legal Advice Sought	Other	Total
All disclosed	11	0	0	0	11
Disclosed in part	84	0	1	0	85
All exempted	3	0	0	0	3
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor	0	0	0	0	0
Total	98	0	1	0	99

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past	Principal Reason					
the Statutory Deadline		External	Internal			
the Statutory Deadinie	Workload	Consultation	Consultation	Other		
2	1	1	0	0		

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	2	2
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	2	2

2.7 Requests for translation

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

Part 3: Extensions

3.1 Reasons for extensions and disposition of requests

	9(1)(a)	9(1) Consu)(b) Iltation	9(1)(c)
	Interference With	Section 69	Other	Third-Party
an Extension Was Taken	Operations	Section 09	Other	Notice
All disclosed	0	2	6	1
Disclosed in part	23	1	52	20
All exempted	1	0	1	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	2	0	0	0
Total	26	3	59	21

3.2 Length of extensions

	9(1)(a)	9(1 Const	9(1)(c)	
Length of Extensions	Interference With Operations	Section 69	Other	Third-Party Notice
30 days or less	9	1	10	0
31 to 60 days	11	1	20	20
61 to 120 days	2	1	26	1
121 to 180 days	1	0	1	0
181 to 365 days	3	0	2	0
365 days or more	0	0	0	0
Total	26	3	59	21

Part 4: Fees

		ollected		or Refunded
	Number of		Number of	
Fee Type	Requests	Amount	Requests	Amount
Application	216	\$1,080	18	\$90
Search	0	\$0	0	\$0
Production	0	\$0	0	\$0
Programming	0	\$0	0	\$0
Preparation	0	\$0	0	\$0
Alternative format	0	\$0	0	\$0
Reproduction	0	\$0	0	\$0
Total	216	\$1,080	18	\$90

Part 5: Consultations Received From Other Institutions and Organizations

5.1 Consultations received from other Government of Canada institutions and organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during reporting period	122	4165	3	85
Outstanding from the previous reporting period	6	260	0	0
Total	128	4425	3	85
Closed during the reporting period	122	4162	3	85
Pending at the end of the reporting period	6	263	0	0

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

	Numb	er of Da	ys Requi	red to C	omplete	Consulta	tion Req	uests
							More	
		16 to	31 to	61 to	121 to	181 to	Than	
	1 to 15	30	60	120	180	365	365	
Recommendation	Days	Days	Days	Days	Days	Days	Days	Total
Disclose entirely	66	10	3	0	0	0	0	79
Disclose in part	18	14	6	2	0	0	0	40
Exempt entirely	2	0	0	0	0	0	0	2
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	1	0	0	0	0	0	1
Other	0	0	0	0	0	0	0	0
Total	86	25	9	2	0	0	0	122

5.3 Recommendations and completion time for consultations received from other organizations

	Numb	er of Da	ys Requi	ired to C	omplete	Consulta	tion Req	uests
							More	
		16 to	31 to	61 to	121 to	181 to	Than	
	1 to 15	30	60	120	180	365	365	
Recommendation	Days	Days	Days	Days	Days	Days	Days	Total
Disclose entirely	2	1	0	0	0	0	0	3
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	2	1	0	0	0	0	0	3

Part 6: Completion Time of Consultations on Cabinet Confidences

6.1 Requests with Legal Services

	Fewer Than 100 Pages Processed			101-500 Pages 501-1 Processed Pages Pro			1001-5000 Pages Processed			an 5000 rocessed
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	15	215	2	248	0	0	0	0	0	0
16 to 30	4	106	3	310	0	0	0	0	0	0
31 to 60	7	48	2	263	0	0	0	0	0	0
61 to 120	3	152	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	29	521	7	821	0	0	0	0	0	0

6.2 Requests with Privy Council Office

	Fewer Than 100 Pages Processed			101_500 Pages		501-1000 1001-5000 ges Processed Pages Processed		More Th Pages Pr		
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

Part 7: Complaints and Investigations

Section 32	Section 35	Section 37	Total
7	1	2	10

Part 8: Court Action

Section 41	Section 42	Section 44	Total
0	0	0	0

Part 9: Resources Related to the Access to Information Act

9.1 Costs

Expenditures		Amount
Salaries		\$1,183,056
Overtime		\$0
Goods and Services		\$188,992
 Professional services contracts 	\$141,278	
Other	\$47,714	
Total		\$1,372,048

9.2 Human Resources

	Person Years Dedicated to Access to Information
Resources	Activities
Full-time employees	13.05
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	1.40
Students	0.50
Total	14.95

Note: Enter values to two decimal places.