



Annual Report on the Access to Information Act

For the period from April 1, 2023, to March 31, 2024

Public Sector Pension Investment Board and its Relevant Wholly-Owned Subsidiaries

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I. Introduction

I.1 Executive Summary

As federal Crown corporations, the Public Sector Pension Investment Board ("PSPIB") and its relevant wholly-owned subsidiaries (collectively "PSP") are subject to the *Access* to *Information Act*.¹

This year's results show that PSP has maintained its high levels of performance. Here is an overview of main results in terms of Access to Information ("ATI") activities during the reporting period:

- ATI requests completed within legislated timelines: 100% compliance.
- ATI requests received: 16 (+ 300% from the previous year).
- Pages processed: 171,784 (+ 3,613% pages processed in 2023-24 compared with 2022-23).
- All mandated proactive disclosure requirements were met.

This report describes PSP's performance in terms of ATI and reflects our commitment to openness and transparency as core principles for a modern, open, and ethical administration.

This report is submitted and tabled to Parliament.

I.2 Presentation of the Report

The *Access to Information Act* was proclaimed into force on July 1, 1983. This report is prepared and tabled in accordance with the following:

- Section 3.01 of the Access to Information Act, which states that PSPIB is a parent Crown corporation for the purposes of the Act.
- Section 94 of the Access to Information Act, which requires every head of a federal government institution to submit a report to Parliament on the administration of the Act during the fiscal year.

PSP operates from its offices in Montréal (Québec) and Ottawa (Ontario), as well as from international offices operated by its wholly-owned subsidiaries in London (United Kingdom), New York (United States) and Hong Kong (Special Administrative Region).

The following presents an overview of the *Access to Information Act* activities conducted within PSP during the reporting period of April 1, 2023, to March 31, 2024.

¹ R.S.C. 1985, c. A-1. Please see https://laws-lois.justice.gc.ca/PDF/A-1.pdf, at sections 3, and 3.01.

I.3 Purpose of the Access to Information Act

The purpose of the *Access to Information Act* is to enhance the accountability and transparency of federal institutions to promote an open and democratic society, and to enable public debate on the conduct of those institutions. In furtherance of that purpose:

- Part 1 of the Access to Information Act extends the present laws of Canada to provide a right of ATI in records under the control of a government institution in accordance with the principles that government information should be available to the public, that necessary exemptions to the right of access should be limited and specific, and that decisions on the disclosure of government information should be reviewed independently of government.
- Part 2 of the Act sets out requirements for the proactive publication of information that are of interest to the public.

I.4 Mandate of PSP

PSP manages the amounts transferred to it by the Government of Canada for the funding of benefits earned from April 1, 2000, by members of the public sector pension plans of the federal Public Service, the Canadian Forces, the Royal Canadian Mounted Police and, since March 1, 2007, the Reserve Force.

In accordance with the *Public Sector Pension Investment Board Act*, PSP's statutory mandate is to:

- Manage amounts that are transferred to it in the best interests of the contributors and beneficiaries under the acts related to the Plans.
- Invest its assets with a view to achieving a maximum rate of return, without undue risk of loss, having regard to the funding, policies and requirements of the Plans and the ability of the Plans to meet their financial obligations.²

A list of relevant subsidiaries 100% owned by PSPIB (as of March 31, 2024), to which the *Access to Information Act* applies, is included in **Appendix A.**³ For more information about PSP, please visit our website at: https://www.investpsp.com/en/.

II. Organizational Structure

The Access to Information and Privacy office ("PSP ATIP office" or "PSP ATIP") is part of the Legal Affairs Department. As ATIP Coordinator, the Senior Director, Legal Affairs, has

² https://laws-lois.justice.gc.ca/PDF/P-31.7.pdf, at section 4.

³ This list includes all first level Canadian subsidiaries, subject to the *Access to Information Act*, which are wholly owned by PSPIB (including those that were dissolved or created during the reporting period) as of March 31, 2024. In addition, the reporting requirements of three active subsidiaries (Canada Growth Fund Investment Management inc.; Downsview Metro Devco Inc.; and Revera Inc.) are met through separate reports, in accordance with TBS content requirements for the 2023-24 annual report to Parliament under the *Access to Information Act*.

delegated authority and is responsible for the implementation and management of programs and services related to PSP's administration of, among other things, the *Access to Information Act* and the *Privacy Act*, as well as advising PSP employees to fulfill their obligations.

The ATIP office is the central coordinating body for all ATIP requests received by PSP. As of March 31, 2024, for the application of the *Access to Information Act*, the ATIP Coordinator is supported by 2 employees and 1 consultant. The 2 employees joined the ATIP Office during the latter half of the reporting period of April 1, 2023, to March 31, 2024.

The ATIP office directs activities within PSP relating to the administration, application, and promotion of the *Access to Information Act* and the *Privacy Act*. It provides advice to senior management on the implementation of the statutes and prepares reports to Parliament, the Treasury Board Secretariat ("TBS") and senior management. The ATIP office represents PSP in complaints and investigations conducted by the Information Commissioner and Privacy Commissioner of Canada, and in any Federal Court applications.

In 2023-24, the PSP ATIP office did not establish any service agreements for ATIP services.

Responsibilities for Implementing Proactive Publication

Travel Expenses and Hospitality Expenses

All proactive disclosure requirements due during the reporting period (100%) were published monthly within the legislated timelines. The Corporate Finance and Strategic Planning team (CFSPT) assists with the proactive publication of travel and hospitality expenses. PSP CFSPT works closely with PSP ATIP staff to meet proactive disclosure requirements. Monitoring is carried out at the time of reporting (on a monthly basis). During the reporting period of April 1, 2023, to March 31, 2024, the ATIP Office and CFSPT began scheduling monthly meetings to review the upcoming publication. This work is carried out under the supervision of PSP's Senior Director, Legal Affairs.

Reports Tabled in Parliament

Within the Strategic Communications and Global Government Affairs team (SCGGAT), the Public Relations and Global Government Affairs team is responsible for proactively publishing reports tabled in Parliament. The PSP ATIP office supports the publication of these reports.

II.3 Other Organizational Context

PSP remains committed to recruiting, training, and maintaining a workforce that possesses specialized skills to continue to provide the best possible service. During the 2023-24 reporting period, PSP initiated several staffing actions, including the recruitment of a seasoned ATIP lawyer and an Analyst who joined PSP's ATIP team towards the end of the 2023-24 reporting period.

III. Delegation Order

In accordance with subsection 95(1) of the *Access to Information Act*, the President and CEO, in her capacity as Head of PSP, has delegated all powers, duties and functions related to the application of the *Access to Information Act* to the following PSP officials:

- Senior Vice-President and Chief Legal and People Officer.
- Senior Director, Legal Affairs and ATIP Coordinator.
- Advisor / Senior Advisor / Counsel or equivalent, ATIP.
- Advisor/Senior Advisor/Counsel or equivalent, Privacy.
- Administrative Analyst or equivalent, Legal Affairs.

The delegation order in effect during the reporting period was signed on September 1, 2022, and a copy can be found in **Appendix B.**

IV. Performance in Fiscal Year 2023-24 - Access to PSP Records under Part 1 of the *Access to Information Act*

The following sections highlight PSP's performance in fiscal year 2023-24 in relation to its obligations under Part 1 of the *Access to Information Act*, as well as analyses of notable statistical data for this year compared with previous years.

Statistical reports prepared by government institutions provide aggregate data on the application of the *Access to Information Act* and the *Privacy Act*. This information is made public each year in a statistical report that accompanies the annual reports on ATI and privacy tabled in Parliament by each institution. The PSP Statistical Report on the *Access to Information Act* for 2023-24 can be found in **Appendix C**.

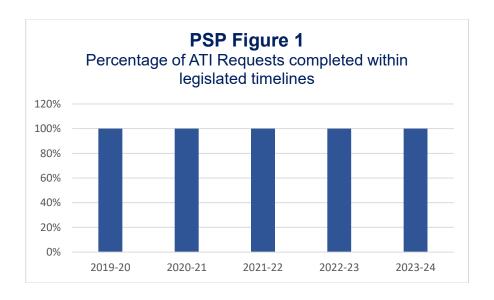
In addition, TBS has asked institutions to report on other ancillary performance data. As a result, PSP presents the 2023-24 Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act* in **Appendix D**.

IV.1 On-Time Compliance Rate

The on-time compliance rate is the percentage of ATI requests responded within their statutory deadlines, including requests for which PSP had recourse to legislative extensions.

In fiscal year 2023-24, PSP ATIP office achieved a 100% on-time compliance rate.

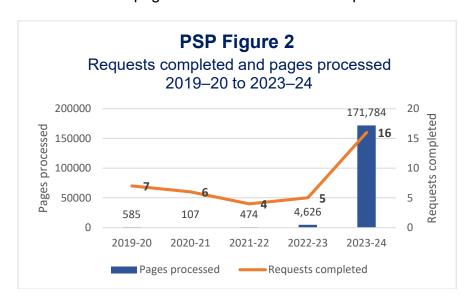
Figure 1 shows the percentage of requests completed within legislated timelines, 2019-20 to 2023-24.



IV.2 Requests Completed and Pages Processed

PSP completed 16 ATI requests in 2023-24, representing **171,784** pages processed. This is an increase of **+ 3,613**% in pages processed in 2023-24 compared with the previous year.

Figure 2 shows, for 2019-20 to 2023-24, the number of ATI requests PSP processed each year and the number of pages it dealt with for these requests.



IV.3 Requests Received and Carried Forward

In fiscal year 2023-24, PSP received a total of 16 new requests under the *Access to Information Act*. This represents a **300**% increase from the 2022–23 total of 4.

The number of requests carried forward (3) has not changed between 2022–23 and 2023-24. The requests were carried over as a result of the date they were received (last quarter of the fiscal year).

Figure 3 shows how many ATI requests PSP received each year and how many were completed for 2019–20 to 2023-24.

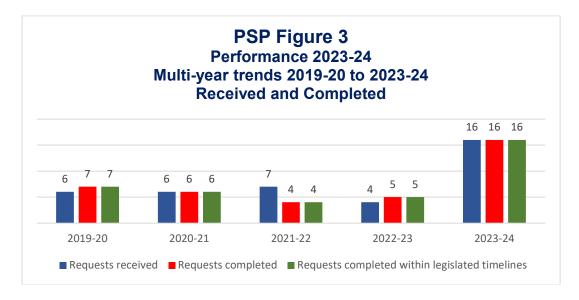
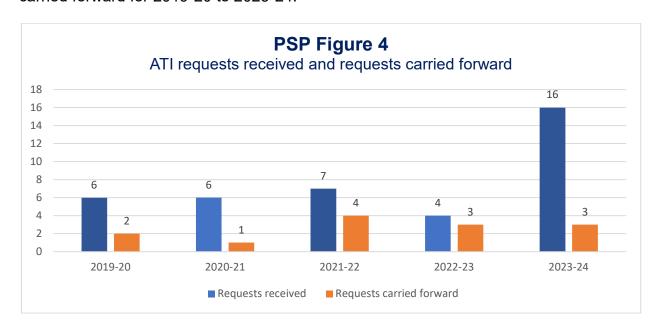


Figure 4 shows how many ATI requests PSP received each year and how many were carried forward for 2019-20 to 2023-24.



All requests carried forward (3) were received in fiscal year 2023-24.

IV.4 Complaints

Complaints Received

Requesters may file a complaint with the Office of the Information Commissioner of Canada (OIC) if they are dissatisfied with the processing of their request. In fiscal year 2023-24, PSP ATIP was informed of 3 complaints received by the OIC.

Table 1 lists the type of complaints received in 2023-24.

| Table 1: Complaints received, by type, 2023-24 | | | |
|--|---|--|--|
| Type of complaint Numbers of complaints | | | |
| Time limits | 2 | | |
| Delay: deemed refusal | 0 | | |
| Refusal: exemptions | 1 | | |
| Refusal: exclusion | 0 | | |
| Refusal: missing records | 0 | | |
| Miscellaneous | 0 | | |
| Total | 3 | | |

Complaints Closed

In August 2023, the OIC initiated an investigation into a complaint filed under the *Access to Information Act* regarding the extension of time limits for reviewing the documents. PSP ATIP was informed by the OIC that the complaint had been discontinued in December 2023.

Table 2 lists the type of complaints closed by the OIC in 2023-24.

| Table 2: Complaints closed by the OIC in 2023-24 | | | |
|--|---------------------|--------------------------|--|
| Disposition of complaint | Numbers of findings | Type of complaint | |
| Not well-founded | 0 | N/A | |
| Discontinued | 1 | Extension of time limits | |
| Well-founded | 0 | N/A | |
| Total | 1 | | |

Active Complaints from Current Reporting Period

In July 2023, the OIC initiated an investigation into a complaint filed under the *Access to Information Act* in response to PSP's refusal to provide access to records based on certain exemptions under the law. The request was for a list of real estate properties owned by PSPIB as of March 31, 2021. The investigation into this complaint is ongoing.

In addition, in February 2024, the OIC opened an investigation into a complaint about the extension of time limits for reviewing the documents. The investigation into this complaint is also ongoing.

Table 3 lists active complaints for period covered by this report.

| Table 3: Active Complaints in the Current Reference Period | | |
|--|-----------------------|--|
| Reporting Period | Numbers of complaints | |
| 2023-2024 | 2 | |
| Total | 2 | |

Table 4 lists the active complaints outstanding from previous reporting periods.

| Table 4: Active Complaints Pending From Previous Reporting Periods | | |
|--|-----------------------|--|
| Reporting Period | Numbers of complaints | |
| 2011-2012 | 2 | |
| Total | 2 | |

IV.5 Extensions

In fiscal year 2023-24, PSP sought extension in 4 instances (20%) because the requests necessitated a search through a large number of records and meeting the original time limit would have unreasonably hampered PSP's operations, and because consultations with other institutions and third-parties were required.

Figure 5 shows the average number of pages processed per completed request, percentage of completed requests that required an extension, and the on-time compliance rate, for fiscal years 2019-20 to 2023-24.

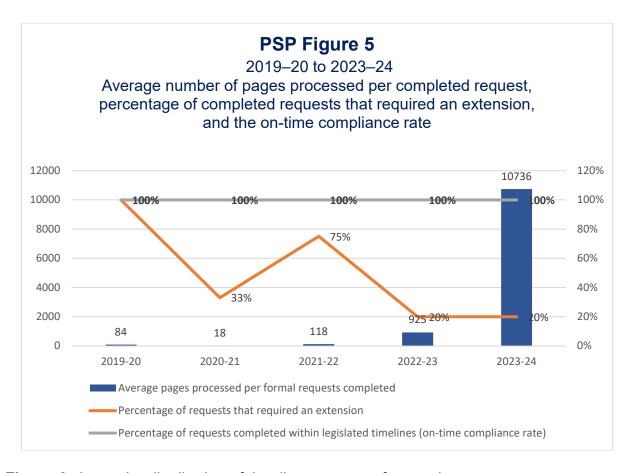
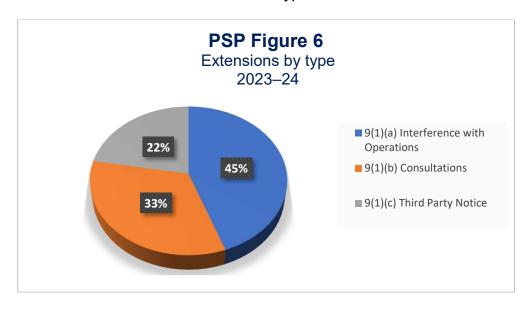


Figure 6 shows the distribution of the diverse types of extensions.



IV.6 Consultations

PSP receives consultation requests from other federal institutions relating to ATI requests for PSP documents or issues. During fiscal year 2023-24, PSP received 2 consultation requests. There were no outstanding consultation requests from the previous reporting period. This year's requests represented a total of 33 pages of information.

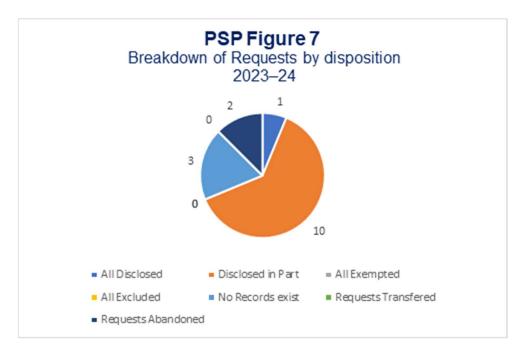
IV.7 Disposition of Requests, Exemptions and Exclusions

Disposition of Requests

In 2023-24, there were 2 ATI requests abandoned by applicants and 3 for which PSP had no documents. Further, no requests were transferred, and none were all exempted, or all excluded.

As for the ATI requests for which documents were provided, for 1 of them, the documents were fully disclosed; for 10 of them, the documents were disclosed in part.

Figure 7 shows the breakdown of ATI requests by disposition for 2023-24.



Exemptions

The Access to Information Act exempts certain information from disclosure. In fiscal 2023-24, 10 sets of documents were exempted under the Act and therefore not fully disclosed because the documents requested contained the following:

 Information that could reasonably be expected to facilitate the commission of an offence (paragraph 16 (2)(c) of the Act).

- Financial, and/or commercial information that belongs to the Government of Canada or a government institution and has substantial value or is reasonably likely to have substantial value (paragraph 18 (a) of the Act).
- Financial and/or commercial information that belongs to, and has consistently been treated as confidential by, PSP (paragraph 18.1(1)(c) of the Act).
- Personal information (subsection 19(1) of the Act).
- Confidential financial, commercial, scientific, or technical third-party information (paragraph 20(1)(b) of the Act).
- Advice or information relating to investment which the PSP has obtained in confidence from a third party if the PSP has consistently treated such advice or information as confidential (section 20.1 of the Act).
- Advice and recommendations (paragraph 21(1)(a) of the Act).
- Account of consultations or deliberations (paragraph 21(1)(b) of the Act).
- Personnel and administration plans (paragraph 21(1)(d) of the Act).
- Internal audits information (paragraph 22.1(1) of the Act).
- Solicitor-client privilege information (section 23 of the Act).
- Information the disclosure of which is restricted by or pursuant to any provision set out in Schedule II of the Access to Information Act (section 24 of the Act).

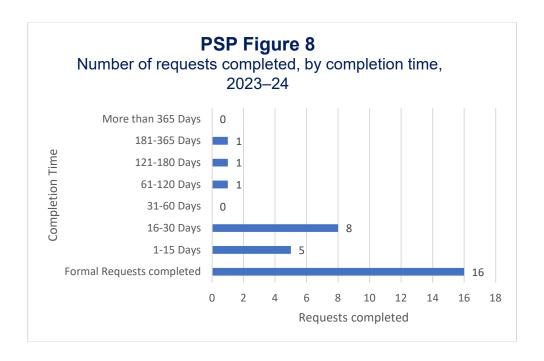
Exclusions

The Access to Information Act does not apply to or excludes Cabinet confidences and confidences of the Privy Council (section 69 of the Act). In addition, documents accessible to the public (for example, government publications such as annual reports and documents held in libraries) are also excluded (paragraph 68(a) of the Act). In 2023-24, 1 set of documents requested was excluded under paragraph 68(a) of the Act because the information requested was publicly available.

IV.8 Completion Times

Of the 16 requests closed this year, **81.25** % were completed within 30 days.

Figure 8 shows the number of requests completed within each completion time.



IV.9 Other Factors which Affected the Activities of the PSP ATIP Office Impact of Parliamentary Committee Activities on the PSP ATIP Office

On January 18, 2023, the Standing Committee on Government Operations and Estimates ("Committee") issued a document production order that applies to federal departments, agencies and Crown Corporations that entered any form of contract with McKinsey and Company ("McKinsey") between January 1, 2011, and January 25, 2023. PSP contracted McKinsey during the production period.

With regards to the production order, the PSP ATIP office was tasked with retrieving records and organizing and coordinating the submissions to be presented to the Committee. As a result, over 10,000 pages of documents were retrieved and processed in parallel with regular ATIP operations.

V. Training and Awareness

In fiscal 2023-24, the PSP ATIP office continued to expand its outreach activities and offered training sessions to all new PSP employees and consultants through the PSP Onboarding program (e-learning). In addition, informal information sessions, one-on-one training, and orientation sessions were provided throughout the reporting period.

To mark Data Privacy Day held on January 28, 2024, the PSP ATIP office promoted the importance of sound privacy management practices and shared responsibility for protecting personal information in day-to-day activities through various awareness-raising activities.

For its *Privacy Awareness Week 2024*, PSP's campaign focused on "everything you always wanted to know about privacy but were afraid to ask." Over 200 employees/consultants responded to a survey and almost 140 colleagues visited our "Privacy pop-up" booth. PSP's campaign also included an online component. In addition to an email communication about the event and information about PSP's privacy education resources, an article was published that included a link to a contest. This article was accompanied by a launch email and an article inviting colleagues to visit the redesigned intranet site to find additional privacy resources and support.

VI. Policies, Guidelines, and Procedures

VI.1 Revised Policies, and Guidelines

Access to Information Regulations and TBS Access to Information Implementation Notice 2023-01

The Access to Information Regulations were updated in June 2023 to bring them into alignment with the 2019 changes to the Access to Information Act. PSP ATIP is in the process of integrating these changes into its current practices and procedures. This is in accordance with TBS Access to Information Implementation Notice 2023-01: Amendments to Access to Information Regulations to assist institutions in implementing the updated Regulations.⁴

TBS President's Action Plan on Open Government

PSPIB supports the TBS President's Action Plan tabled before Parliament in December 2022⁵ to achieve three strategic outcomes: 1) improving services to Canadians; 2) increasing trust and transparency in institutions; and 3) advancing reconciliation with Indigenous peoples. To achieve these results, PSP ATIP is in the process of integrating the following into its current practices and procedures:

- TBS Access to Information and Privacy Implementation Notice 2023-01: Advancing Reconciliation with Indigenous Peoples by Providing Culturally Appropriate Services.⁶
- TBS Access to Information Act Plain Language Guide to Exemptions and Exclusions.⁷

TBS Directive on Proactive Publication under the Access to Information Act to provide policy direction on the administration of Part 2 of the Act

⁴ https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/2023-01-amendments-access-information-regulations.html.

⁵ https://publications.gc.ca/collections/collection 2022/sct-tbs/BT22-130-2022-eng.pdf.

⁶ https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/2023-01-advancing-reconciliation-indigenous-peoples.html.

⁷ https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/aia-plain-language-guide.html.

PSP has aligned its proactive publications with relevant TBS policy instruments with respect to the proactive publication of information.⁸ To this end, PSP has set up and maintains an internal management tracking system to monitor the processing, approval, and publication of proactive publications as described above.

TBS Policy on Access to Information (updates concomitant to the adoption of the new TBS Directive on Proactive Publication)

In accordance with the TBS *Policy on Access to Information* (effective June 28, 2023), PSP has identified those officials who are responsible for supporting PSP's President and CEO's accountability for requirements under Part 2 of the Act. PSP has also identified the positions with obligations for proactive publication and the roles and responsibilities for each position and ensures officers or employees in those positions are aware of their roles and responsibilities. The Open Government Portal (open.canada.ca) is used by PSP to publish proactive publications. Moreover, in accordance with Appendix D of the Directive, which stipulates a minimum retention period of ten years for information proactively published under Part 2 of the Act, PSP has incorporated the underlying documents that support proactive publications into its retention and disposition schedules. In addition, PSP monitors its compliance with proactive publication requirements under Part 2 of the Act and TBS directives.

VI.2 Revised Procedures

Info Source

Effective July 1, 2023, TBS changed the online publication requirements from "Information About Programs and Information Holdings" to "Info Source". As a result, the new online publication requirements came into effect on July 1, 2023. 10 The revised Info Source requirements document clarifies the Info Source Decentralized Publishing Requirements and adopts a format that matches other TBS policy instruments. PSP will comply with these new requirements for its next publication.

VII. Proactive Publication under Part 2 of the Access to Information Act

PSP is subject to Part 2 of the *Access to Information Act*. PSP is subject to the following legislative requirements, for which the ATIP Office collaborates with senior officials to meet the relevant legislative requirements for proactive publication.

⁸ Among others, the TBS *Directive on Proactive Publication under the Access to Information Act* (effective June 28, 2023) that provides policy direction on the administration of Part 2 of the Act. See https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32756.

⁹ https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=12453.

https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information/access-informatio-policies-guidance/programs-holdings-online-publishing-requirements.html.

| Legislative Requirement | Section | Publication Timeline | | |
|--|---------|---|--|--|
| All Government Institutions as defined in section 3 of the Access to Information Act | | | | |
| Travel Expenses | 82 | Within 30 days after the end of the month of reimbursement. | | |
| Hospitality Expenses | 83 | Within 30 days after the end of the month of reimbursement. | | |
| Reports tabled in Parliament | 84 | Within 30 days after tabling. | | |

The PSP ATIP office supports the publication of certain requirements for proactive publication of information under Part 2 of the *Access to Information Act*. This includes creating procedural guides on proactive publication and reviewing all documents before publication.

Corporate Finance and Strategic Planning Branch: Corporate Controller

The CFSPT oversees the proactive publication of travel and hospitality expenses.

The CFSPT is responsible for providing internal corporate services in support of PSP programs. The Branch supports programs in the allocation and management of funds, assets, and contracts, and develops corporate tools and reports to demonstrate results and accountabilities to Canadians. During the 2023-24 reporting period, the CFSPBTmet the proactive publication requirements at a compliance rate of one hundred percent (100%).

Table 5 lists the Compliance rate of proactive publication requirements.

| Table 5 – Compliance rate of proactive publication requirements | | | | |
|---|---------|---|-----------------|--|
| Legislative requirements | Section | Publication timeline | Compliance rate | Proactive publication (web links) |
| Travel Expenses | 82 | Within 30 days after the end of the month of reimbursement | | https://search.open.canada.ca/travel/ el/ https://www.investpsp.com/en/access-information/ |
| Hospitality Expenses | 83 | Within 30 days after the end of the month of reimbursement | | https://open.canada.ca/en/search/hospitalityq https://www.investpsp.com/en/access-information/ |

In fiscal year 2023-24, there were **361** proactive disclosures relating to travel and hospitality.

All proactive disclosure requirements due during the reporting period were published monthly within the legislated timelines. PSP closely monitors the accuracy and completeness of information proactively disclosed under Part 2 of the Act. To this end, PSP ATIP staff work closely with PSP CFSPT staff. Monitoring is carried out at the time of reporting (on a monthly basis). This work is performed under the supervision of PSP's Senior Director, Legal Affairs. Control procedures are well developed and are in place to ensure compliance with the law. PSP fully adheres to the statutory publication schedule.

Strategic Communications and Global Government Affairs Branch: Public Relations and Global Government Affairs

Within the SCGGAT, the Public Relations and Global Government Affairs team is responsible for publishing reports tabled in Parliament.

During the 2023-24 reporting period, PSP ATIP collaborated with program leads to review and publish the relevant information in accordance with the legislative requirements. A summary list of completed ATI requests is also published on the Open Government Registry Portal on a monthly basis.

Table 6 affirms that PSP met the publication requirements under section 84 of the *Access to Information Act* at a compliance rate of one hundred percent (**100%**).

| Table 6 – Compliance rate of publication requirements for SCGGAB, Part 2 of the <i>Access to Information Act</i> , 2023-24 | | | | |
|--|---------|------------------------------|--------------------|--|
| Legislative requirement | Section | Publication timeline | Compliance rate | Proactive publication (web links) |
| Reports tabled in Parliament | 84 | Within 30 days after tabling | 100% | https://www.investpsp.com/en/investm ent-performance/reports/ |
| | | | | https://www.investpsp.com/en/access-information/ |
| | | | | https://www.investpsp.com/en/privacy/ |

The PSP ATIP office supports the publication of these reports through, among others, the drafting of the *Access to Information Act Annual Report*, and of the *Privacy Act Annual Report*, coordinating with the web team, and reviewing all documents before publication.

In 2023-24, there were **3** reports tabled in Parliament. PSP is fully compliant with the statutory publication schedule.

VIII. Initiatives and Projects to Improve Access to Information

VIII.1 2023-24 Initiatives

ATIP Online Request Service

As part of its commitment to openness and transparency, PSP ATIP is providing simpler and more efficient ATI through its participation to the TBS ATIP Online Request Service ("AORS"). The AORS streamlines the process of requesting information and is part of a series of key actions PSP is taking to improve ATI in ways that have an immediate impact. This platform also allows international users to submit *Privacy Act* requests. In 2023-24, PSP requested TBS to update the list of its Wholly-Owned Subsidiaries which appears in the AORS system. Through its participation and leadership, PSP aims to improve transparency; ATI services; processes and timeliness. PSP provides benefits to all Canadians through its contribution to the improvement of the ATIP online user experience, by making it easier for Canadians to access government institution information via a simple, central website, where they can submit requests to government institutions covered by the *Access to Information Act*.

Access to Information and Privacy Community Development

The TBS ATIP Community Development Office ("APCDO") contributes to the development and sustainability of the ATI and privacy communities via recruitment, retention, learning, networking, and partnership activities with a spirit of diversity, inclusivity, and accessibility through community engagement. Whenever possible, the PSP ATIP office contributes to the APCDO. PSP aims to strengthen the ATIP community, ATI services, processes, and timeliness. Through its contribution to APCDO, PSP helps strengthen the ability of ATIP offices to provide Canadians with timely access to government institution information by attracting new talents and providing ATIP professionals with centralized training and professional development programs, to the benefit of all Canadians.

TBS Training Sessions

In 2023-24, TBS APCDO offered training sessions on specific sections of the *Access to Information Act*. The PSP ATIP office consistently participated in these training sessions. Through this participation, PSP contributes to strengthening the ATIP community; ATI services; processes and timeliness. Through its contribution to APCDO, PSP supports training and professional development of the ATIP communities which help increase the capacity of ATIP offices to provide access to government institution information in a timely manner, to the benefit of all Canadians.

¹¹ https://atip-aiprp.apps.gc.ca/atip/welcome.do.

VIII.2 2024-25 Upcoming Initiatives

In fiscal 2024-25, PSP ATIP intends to participate to the following initiatives:

Facilitate Access to Government Information by Indigenous Requesters (or those acting on their behalf)

Through TBS activities, PSP ATIP will maintain engagement and outreach activities with Indigenous organizations:

- To continue to work to address administrative and operational barriers to ATI.
- To continue to support the reflection of Indigenous needs and interests in a coherent way through continuous improvements to the ATI regime and through the Department of Justice's work on Privacy Act modernization.

Improvements sought: transparency; improvements to ATI services, processes, and timeliness; advancing Indigenous Reconciliation; and strengthening the ATIP community. *Benefits sought*: support the Government of Canada ongoing commitment to respecting and supporting Indigenous self-determination in Canada, including by improving Indigenous ATI and supporting Indigenous-led information and data strategies.

Implement Technological Changes

PSP has begun assessments to consider the possibility to acquire, implement and maximize the benefits of the next-generation of ATIP request processing software. *Improvements sought:* improvements to ATI services, processes, and timeliness. *Benefits sought:* leveraging modern technologies to improve the processing and tracking of ATIP requests, as well as privacy-related matters.

Annual statistical reporting

Through TBS activities, PSP ATIP will contribute to improve the ATIP statistical reports by conveying more clearly the aggregated statistical data that is most relevant to Canadians. *Improvement sought:* transparency. *Benefits sought:* improving reporting on the administration of the *Access to Information Act*, and of the *Privacy Act*, to the public and stakeholders to better track ongoing trends and help identify shortcomings.

IX. Summary of Key Issues and Actions Taken on Complaints and Court Cases

IX.1 Actions Taken on Complaints

PSP ATIP reviews the outcomes of all OIC investigations and, where appropriate, incorporates lessons learned into business processes.

To this end, PSP ATIP consults the final reports published in the OIC's decisions database. The OIC final reports explain how investigators interpret and apply the *Access*

to Information Act. Of importance, the "Interpretation" section on the OIC's guidance page. This section:

- Explains what exemptions and exclusions are for and what type of information they cover.
- Groups by topic the requirements institutions must meet and circumstances that must exist when PSP makes decisions about access requests and responds to requests.
- Sets out the requirements considered by investigators in their analysis and in their report when examining PSP's actions.

As part of this process, PSP ATIP adheres, as far as possible, to the Commissioner's interpretation of the law. PSP reviews OIC guidance and interpretation documents, as well as OIC decisions, when considering decisions relating to ATI requests and will continue to do so.

X. Service Fees Act

Please note that as Crown Corporations, PSPIB and its wholly-owned subsidiaries are **not** subject to the *Service Fees Act* reporting requirements.

XI. Monitoring Compliance

As evidenced by a **100**% on-time compliance rate year after year, PSP ATIP staff closely monitors the *time it takes to process* ATI requests. Compliance is ensured on an on-going basis through the use of an ATI request tracking system and weekly reports to PSP's Senior Director of Legal Affairs. Follow-up is conducted on an on-going basis, and reports are produced via PSP's ATI request tracking system.

In conjunction with this, PSP ensures that *measures to support the public's right of access to information* are reflected in contracts, information-sharing agreements, and information-sharing arrangements in accordance with section 4.2.8 of the TBS *Directive on Access to Information Requests*. ¹² To this purpose, the PSP ATIP office is integrated with the PSP Legal Affairs department, and staff work in collaboration with colleagues in the PSP's Legal Affairs department, as needed. This work is done under the supervision of the PSP Senior Director, Legal Affairs. Monitoring occurs in part through regular team meetings.

Finally, the ATIP office produces a variety of regular and ad hoc reports to monitor PSP's compliance with the *Access to Information Act* and *Privacy Act* through the quarterly review of key performance indicators.

¹² https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=18310.

Appendix A: List of relevant Wholly-Owned Subsidiaries

PUBLIC SECTOR PENSION INVESTMENT BOARD/ OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC

RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2024) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2024)

| | FILIALES A PROPRIETE EXCLUSIVE CONCERNEES (au 31 mars 2024) | | | | | |
|-----|--|--|--|--|--|--|
| | Name of Subsidiary | French Version in Corporate Name | French Business Name | | | |
| 1. | 14602889 Canada Inc. | N/A | N/A | | | |
| 2. | 3Net Indy Holdings Inc. | N/A | Gestion 3Net Indy | | | |
| 3. | 3Net Indy Investments Inc. | N/A | Investissements 3Net Indy | | | |
| 4. | 7986386 Canada Inc. | N/A | N/A | | | |
| 5. | 8599963 Canada Inc. | N/A | N/A | | | |
| 6. | Argentia Private Investments Inc. | N/A | Argentia Investissements Privés | | | |
| 7. | AviAlliance Canada Inc. | N/A | N/A | | | |
| 8. | Belle Bay Private Investments Inc. | N/A | Investissements Privés Belle Bay | | | |
| 9. | Blue & Gold Private Investments Inc. | N/A | Blue & Gold Investissements Privés | | | |
| 10. | Canada Growth Fund Investment Management Inc./Gestion d'actifs fonds de croissance du Canada Inc. | Gestion d'actifs fonds de croissance du Canada Inc. | N/A | | | |
| 11. | Datura Private Investments Inc. | N/A | Datura Investissements Privés | | | |
| 12. | Downsview Metro Devco Inc. | N/A | Gestion Downsview Métro Devco | | | |
| 13. | FirstLight Holding Inc. | N/A | N/A | | | |
| 14. | Galvaude Private Investments Inc. | N/A | Investissements Privés Galvaude | | | |
| 15. | Indo-Infra Inc. | N/A | Gestion Indo-Infra | | | |
| 16. | Infra TM Investments Inc. | N/A | Investissements Infra TM | | | |
| 17. | Infra-PSP Canada Inc. | N/A | N/A | | | |
| 18. | Infra-PSP Credit Inc. | N/A | Infra-PSP Crédit | | | |
| 19. | Infra-PSP ECEF Inc. | N/A | N/A | | | |
| 20. | Infra-PSP Partners Inc. | N/A | Infra-PSP Associés | | | |
| 21. | Ivory Private Investments Inc. | N/A | Ivory Investissements Privés | | | |
| 22. | Kings Island Private Investments Inc. | N/A | Kings Island Investissements Privés | | | |
| 23. | Northern Fjord Holdings Inc. | N/A | Gestion Northern Fjord | | | |
| 24. | Port-aux-Choix Private Investments Inc. | N/A | Port-aux-Choix Investissements Privés | | | |
| 25. | Potton Holdings Inc. | N/A | Gestion Potton | | | |
| 26. | PSP Capital Inc. | N/A | N/A | | | |
| 27. | PSP FINCO Inc. | N/A | N/A | | | |
| 28. | PSP FINCO LATAM Inc. | N/A | Gestion PSP Finco Latam | | | |

PUBLIC SECTOR PENSION INVESTMENT BOARD/ OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC

RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2024) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2024)

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| Cattle 47. PSPIB Homes Inc. N/A Gestion PSPIB Homes 48. PSPIB Lunar linvestments Inc. N/A Investissements PSPIB Lunar 49. PSPIB Mexico GP INC. N/A Commandité PSPIB Mexico 50. PSPIB Michigan G.P. Inc. N/A PSPIB Michigan Commandité 51. PSPIB Orchid Inc. N/A Gestion PSPIB Orchid 52. PSPIB Paisas Inc. N/A Gestion PSPIB Paisas |
| Cattle 47. PSPIB Homes Inc. N/A Gestion PSPIB Homes 48. PSPIB Lunar linvestments Inc. N/A Investissements PSPIB Lunar 49. PSPIB Mexico GP INC. N/A Commandité PSPIB Mexico 50. PSPIB Michigan G.P. Inc. N/A PSPIB Michigan Commandité 51. PSPIB Orchid Inc. N/A Gestion PSPIB Orchid 52. PSPIB Paisas Inc. N/A Gestion PSPIB Paisas |
| 48.PSPIB Lunar linvestments Inc.N/AInvestissements PSPIB Lunar49.PSPIB Mexico GP INC.N/ACommandité PSPIB Mexico50.PSPIB Michigan G.P. Inc.N/APSPIB Michigan Commandité51.PSPIB Orchid Inc.N/AGestion PSPIB Orchid52.PSPIB Paisas Inc.N/AGestion PSPIB Paisas |
| 49.PSPIB Mexico GP INC.N/ACommandité PSPIB Mexico50.PSPIB Michigan G.P. Inc.N/APSPIB Michigan Commandité51.PSPIB Orchid Inc.N/AGestion PSPIB Orchid52.PSPIB Paisas Inc.N/AGestion PSPIB Paisas |
| 50.PSPIB Michigan G.P. Inc.N/APSPIB Michigan Commandité51.PSPIB Orchid Inc.N/AGestion PSPIB Orchid52.PSPIB Paisas Inc.N/AGestion PSPIB Paisas |
| 51.PSPIB Orchid Inc.N/AGestion PSPIB Orchid52.PSPIB Paisas Inc.N/AGestion PSPIB Paisas |
| 51.PSPIB Orchid Inc.N/AGestion PSPIB Orchid52.PSPIB Paisas Inc.N/AGestion PSPIB Paisas |
| |
| |
| 53. PSPIB Pennsylvania N/A Investissements PSPIB |
| Investments Inc. Pennsylvania |
| 54. PSPIB Realty International Inc. / PSPIB Immobilier N/A |
| PSPIB Immobilier International International Inc. |
| Inc. |
| 55. PSPIB REITCO I Inc. N/A Gestion PSPIB REITCO I |
| 56. PSPIB Services USA LLC N/A N/A |
| 57. PSPIB Stanley Investments Inc. N/A N/A |
| , |
| 58. PSPIB Steam Investments Inc. N/A Investissements PSPIB Steam |

PUBLIC SECTOR PENSION INVESTMENT BOARD/ OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC

RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2024) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2024)

| | Name of Subsidiary | French Version in Corporate Name | French Business Name |
|-----|----------------------------------|----------------------------------|---------------------------------|
| 60. | PSPIB Unitas Investments II Inc. | N/A | N/A |
| 61. | PSPIB Unitas Investments Inc. | N/A | N/A |
| 62. | PSPIB Wexford Investments Inc. | N/A | Investissements PSPIB Wexford |
| 63. | PSPIB-Al Investments Inc. | N/A | Investissements PSPIB-AI |
| 64. | PSPIB-Andes Inc. | N/A | Gestion PSPIB-Andes |
| 65. | PSPIB-ARE Canada Inc. | N/A | Gestion PSPIB-ARE Canada |
| 66. | PSPIB-ARE Services Inc. | N/A | Services PSPIB-ARE |
| 67. | PSPIB-Condor Inc. | N/A | N/A |
| 68. | PSPIB-Eldorado Inc. | N/A | Gestion PSPIB-Eldorado |
| 69. | PSPIB-ILS Investments Inc. | N/A | Investissements PSPIB-ILS |
| 70. | PSPIB-LSF Inc. | N/A | N/A |
| 71. | PSPIB-RE Finance II Inc. | N/A | Gestions PSPIB-RE Finance II |
| 72. | PSPIB-RE Finance Inc. | N/A | N/A |
| 73. | PSPIB-RE Finance Partners II | N/A | PSPIB-RE Finance Associés II |
| | Inc. | | |
| 74. | PSPIB-RE Finance Partners Inc. | N/A | PSPIB-RE Finance Associés |
| 75. | PSPIB-RE Manchester Inc. | N/A | Gestion PSPIB-RE Manchester |
| 76. | PSPIB-RE Partners II Inc. | N/A | PSPIB-RE Associés II |
| 77. | PSPIB-RE Partners Inc. | N/A | PSPIB-RE Associés |
| 78. | PSPIB-RE UK Inc. | N/A | Gestion PSPIB-RE UK |
| 79. | PSPIB-SDL Inc. | N/A | N/A |
| 80. | PSPIB-Star Inc. | N/A | PSPIB-Étoile |
| 81. | Red Isle Private Investments | N/A | Red Isle Investissements Privés |
| | Inc. | | |
| 82. | Revera Inc. | N/A | N/A |
| 83. | Sooke Investments Inc. | N/A | Investissements Sooke |
| 84. | Trinity Bay Private Investments | N/A | Placements Privés Trinity Bay |
| | Inc. | | |
| 85. | Vertuous Energy Canada Inc. | N/A | Énergie Vertuous Canada |
| 86. | VOP Investments Inc. | N/A | Investissements VOP |

This list includes all first level Canadian subsidiaries, subject to the *Access to Information Act*, which are wholly owned by PSPIB (including those that were dissolved or created during the reporting period) as of March 31, 2024. In addition, the reporting requirements of three active subsidiaries (Canada Growth Fund Investment Management inc. [line 10, above]; Downsview Metro Devco Inc. [line 12, above]; and Revera Inc. [line 82, above]) are met through separate reports, in accordance with TBS content requirements for the 2023-24 annual report to Parliament under the *Access to Information Act*.

Appendix B: Delegation Order

Public Sector Pension Investment Board ("PSPIB") and its Wholly-Owned Subsidiaries

Delegation Order ("Order")

(section 95(1), Access to Information Act,

R.S.C. 1985, c. A-1, as amended and section 73, Privacy Act, R.S.C. 1985, c. P-21, as amended)

- This Order may be cited as the "PSPIB and wholly-owned subsidiaries of PSPIB Head of Institution Delegation Order pursuant to the Access to Information Act and Privacy Act".
- 2. Pursuant to Section 95(1) of the Access to Information Act and Section 73 of the Privacy Act, the undersigned, acting in her capacity of head of PSPIB, its Wholly-Owned Subsidiaries in existence as of the date of this Order as well as those which may hereafter be established, PSP Investments USA LLC, PSP Investments Holding Europe Ltd and PSP Investments Asia Limited (the "Government Institutions"), hereby designate the persons holding the positions set out in the schedule set forth in the attached Section 4 below, or the persons occupying on an acting basis those positions, to exercise her powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite each position. This Delegation Order replaces all previous delegation orders for the Government Institutions.
- For the purposes of this Order, "Wholly-Owned Subsidiaries" shall include all Canadian
 wholly-owned subsidiaries of PSPIB which are corporations, with the exception of those
 subsidiaries with their own heads.

This Delegation Order has been made in Montreal and is effective starting on the <u>1st</u> day of September 2022.

Deborah K. Orida President and CEO

4. Schedule

PSPIB Delegation of Authority Under the Access to Information Act and the Privacy Act

| Position/Title | Access to Information Act and Regulations | Privacy Act and Regulations |
|--|---|--------------------------------|
| Senior Vice President and Chief Legal Officer | Full authority | Full authority |
| Senior Director or Managing Director, Legal Affairs and ATIP Coordinator | Full authority | Full authority |
| Advisor/Senior Advisor/Counsel or equivalent, Access to Information and Privacy | Full authority | Full authority |
| Advisor/Senior Advisor/Counsel or equivalent, Privacy | Full authority | Full authority |
| Administrative Analyst or equivalent, Legal Affairs | Paragraph 7(a) Section 9 | Paragraph 14(a) Section 15 |

Appendix C: Statistical Report

| | Government | Gouvernement |
|---|------------|--------------|
| * | of Canada | du Canada |

Statistical Report on the Access to Information Act

| Name of institution: | PSPIB and relevant wholly-owne | d subsidiaries | |
|----------------------|--------------------------------|----------------|------------|
| Reporting period: | 2023-04-01 | to | 2024-03-31 |

Section 1: Requests Under the Access to Information Act

1.1 Number of requests

| Received during reporting period | | | |
|---|----|--|--|
| Outstanding from previous reporting periods Outstanding from previous reporting period 3 | | | |
| 3 | | | |
| Outstanding from more than one reporting period | | | |
| Total | | | |
| | 16 | | |
| Carried over to next reporting period | | | |
| Carried over within legislated timeline | | | |
| 0 | 1 | | |
| | 3 | | |

1.2 Sources of requests

| Source | Number of Requests |
|---------------------------|--------------------|
| Media | 0 |
| Academia | 2 |
| Business (private sector) | 0 |
| Organization | 1 |
| Public | 12 |
| Decline to Identify | 1 |
| Total | 16 |

1.3 Channels of requests

| Source | Number of Requests |
|-----------|--------------------|
| Online | 16 |
| E-mail | 0 |
| Mail | 0 |
| In person | 0 |
| Phone | 0 |
| Fax | 0 |
| Total | 16 |

Section 2: Informal Requests

2.1 Number of informal requests

| | | Number of Requests |
|--|---|--------------------|
| Received during reporting period | | 21 |
| Outstanding from previous reporting periods | | 1 |
| Outstanding from previous reporting period | 1 | |
| Outstanding from more than one reporting period | 0 | |
| Total | | 22 |
| Closed during reporting period | | 22 |
| Carried over to next reporting period | | 0 |

2.2 Channels of informal requests

| Source | Number of Requests |
|-----------|--------------------|
| Online | 21 |
| E-mail | 0 |
| Mail | 0 |
| In person | 0 |
| Phone | 0 |
| Fax | 0 |
| Total | 21 |

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 | |
| 2 | 8 | 11 | 1 | 0 | 0 | 0 | 22 |

2.4 Pages released informally

| Less Than 100 Pages Released | | | -500 Released | | 501-1000 1001-5000 ages Released Pages Released | | | nan 5000 Released | |
|---------------------------------|-------------------|-----------------------|-------------------|-----------------------|--|-----------------------|-------------------|-----------------------|-------------------|
| Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released |
| 4 | 98 | 1 | 259 | 0 | 0 | 0 | 0 | 0 | 0 |

2.5 Pages re-released informally

| | Less Than 100 Pages Re-released | | 100-500 Pages Re-released | | 501-1000 1001-5000 Pages Re-released Pages Re-released | | | AND THE RESERVE OF THE PERSON NAMED IN COLUMN | nan 5000 e-released |
|-----------------------|------------------------------------|-----------------------|------------------------------|-----------------------|--|-----------------------|-----------------------|---|------------------------|
| Number of Requests | Pages Re- released | Number of Requests | Pages Re- released | Number of Requests | Pages Re- released | Number of Requests | Pages Re- released | Number of Requests | Pages Re- released |
| 13 | 283 | 1 | 469 | 0 | 0 | 3 | 13866 | 0 | 0 |

Section 3: Applications to the Information Commissioner on Declining to Act on Requests

| | Number of Requests |
|--|--------------------|
| Outstanding from previous reporting period | 0 |
| Sent during reporting period | 0 |
| Total | 0 |
| Approved by the Information Commissioner during reporting period | 0 |
| Declined by the Information Commissioner during reporting period | 0 |
| Withdrawn during reporting period | 0 |
| Carried over to next reporting period | 0 |

Section 4: Requests Closed During the Reporting Period

4.1 Disposition and completion time

| | Completion Time | | | | | | | |
|--|-----------------|---------------|------|----------------|--------------------|--------------------|----------|-------|
| Disposition of Requests | 0 to 15 Days | 16 to 30 Days | Days | 61 to 120 Days | 121 to 180 Days | 181 to 363 Days | 365 Days | Total |
| All disclosed | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Disclosed in part | 1 | 6 | 0 | 1 | 1 | 1 | 0 | 10 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| No records exist | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Request transferred | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 2 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Declined to act with the approval of the Information Commissioner | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

| Total | _ | ۱ . | ١ ، | | | | ١٠ | 16 | ı |
|-------|---|-----|-----|---|---|---|----|----|---|
| Total | 5 | 8 | 0 | 1 | 1 | 1 | 0 | 16 | |

4.2 Exemptions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|---------------|-----------------------|--------------|-----------------------|------------------------|-----------------------|-----------|-----------------------|
| 13(1)(a) | 0 | 16(2) | 0 | 18(a) | 2 | 20,1 | 3 |
| 13(1)(b) | 0 | 16(2)(a) | 0 | 18(b) | 0 | 20,2 | 0 |
| 13(1)(c) | 0 | 16(2)(b) | 0 | 18(c) | 0 | 20,4 | 0 |
| 13(1)(d) | 0 | 16(2)(c) | 1 | 18(d) | 0 | 21(1)(a) | 1 |
| 13(1)(e) | 0 | 16(3) | 0 | 18.1(1)(a) | 0 | 21(1)(b) | 1 |
| 14 | 0 | 16.1(1)(a) | 0 | 18.1(1)(b) | 0 | 21(1)(c) | 0 |
| 14(a) | 0 | 16.1(1)(b) | 0 | 18.1(1)(c) | 10 | 21(1)(d) | 1 |
| 14(b) | 0 | 16.1(1)(c) | 0 | 18.1(1)(d) | 0 | 22 | 0 |
| 15(1) | 0 | 16.1(1)(d) | 0 | 19(1) | 1 | 22.1(1) | 1 |
| 15(1) - I.A.* | 0 | 16.2(1) | 0 | 20(1)(a) | 0 | 23 | 1 |
| 15(1) - Def.* | 0 | 16,3 | 0 | 20(1)(b) | 2 | 23,1 | 0 |
| 15(1) - S.A.* | 0 | 16.4(1)(a) | 0 | 20(1)(b.1) | 0 | 24(1) | 1 |
| 16(1)(a)(i) | 0 | 16.4(1)(b) | 0 | 20(1)(c) | 0 | 26 | 0 |
| 16(1)(a)(ii) | 0 | 16,5 | 0 | 20(1)(d) | 0 | | |
| 16(1)(a)(iii) | 0 | 16,6 | 0 | | | • | |
| 16(1)(b) | 0 | 17 | 0 | 1 | | | |
| 16(1)(c) | 0 | | | • | | | |
| 16(1)(d) | 0 | * LA.: Inter | mational Affairs D | ef.: Defence of Canada | S.A.: Subversive Ad | ctivities | |

4.3 Exclusions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|---------|--------------------|----------|--------------------|-----------------|--------------------|
| 68(a) | 1 | 69(1) | 0 | 69(1)(g) re (a) | 0 |
| 68(b) | 0 | 69(1)(a) | 0 | 69(1)(g) re (b) | 0 |
| 68(c) | 0 | 69(1)(b) | 0 | 69(1)(g) re (c) | 0 |
| 68.1 | 0 | 69(1)(c) | 0 | 69(1)(g) re (d) | 0 |
| 68.2(a) | 0 | 69(1)(d) | 0 | 69(1)(g) re (e) | 0 |
| 68.2(b) | 0 | 69(1)(e) | 0 | 69(1)(g) re (f) | 0 |
| | | 69(1)(f) | 0 | 69.1(1) | 0 |

4.4 Format of information released

| Paper | E-record | Data set | Video | Audio | Other |
|-------|----------|----------|-------|-------|-------|
| 0 | 11 | 0 | 0 | 0 | 0 |

4.5 Complexity

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

| Number of Pages Processed | Number of Pages Disclosed | Number of Requests |
|---------------------------|---------------------------|--------------------|
| 171784 | 11629 | 13 |

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

| | Less Than 100 100-500 501-1000 Pages Processed 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 | 1 | 67 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 6 | 122 | 1 | 259 | 0 | 0 | 1 | 3731 | 2 | 17605 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 150000 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Declined to act with the approval of the Information Commissioner | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 8 | 189 | 1 | 259 | 0 | 0 | 1 | 3731 | 3 | 167605 |

4.5.3 Relevant minutes processed and disclosed for audio formats

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 0 | 0 | 0 |

4.5.4 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 | 0 | 0 | 0 | 0 | 0 | 0 | |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 | 0 | |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 | |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | |
| Declined to act with the approval of the Information Commissioner | 0 | 0 | 0 | 0 | 0 | 0 | |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | |

4.5.5 Relevant minutes processed and disclosed for video formats

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 0 | 0 | 0 |

$\textbf{4.5.6 Relevant minutes processed per request disposition for \underline{video} \ formats \ by \ size \ of \ requests}$

| | | 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 | 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 | |
| Declined to act with the approval of the Information Commissioner | 0 | 0 | 0 | 0 | 0 | 0 | |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | |

4.5.7 Other complexities

| Disposition | Consultation Required | Legal Advice Sought | Other | Total |
|--|--------------------------|---------------------|-------|-------|
| All disclosed | 0 | 0 | 0 | 0 |
| Disclosed in part | 3 | 0 | 0 | 3 |
| All exempted | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 |
| Request abandoned | 1 | 1 | 0 | 2 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 |
| Declined to act with the approval of the Information Commissioner | 0 | 0 | 0 | 0 |
| Total | 4 | 1 | 0 | 5 |

4.6 Closed requests

4.6.1 Requests closed within legislated timelines

| Number of requests closed within legislated timelines | 16 |
|---|-----|
| Percentage of requests closed within legislated timelines (%) | 100 |

4.7 Deemed refusals

4.7.1 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 | | | | |

4.7.2 Requests 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 |

4.8 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 5: Extensions

5.1 Reasons for extensions and disposition of requests

| | | 9(1) Consu | | |
|--|--|---------------|-------|-------------------------------|
| Disposition of Requests Where an Extension Was Taken | 9(1)(a) Interference With Operations/ Workload | Section 69 | Other | 9(1)(c) Third-Party Notice |
| All disclosed | 0 | 0 | 0 | 0 |
| Disclosed in part | 3 | 0 | 2 | 1 |
| All exempted | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 |
| Request abandoned | 1 | 0 | 1 | 1 |
| No records exist | 0 | 0 | 0 | 0 |
| Declined to act with the approval of the Information Commissioner | 0 | 0 | 0 | 0 |
| Total | 4 | 0 | 3 | 2 |

5.2 Length of extensions

| | 9(1)(a) | 9(1 Consu |)(b) Itation | |
|----------------------|---|--------------|-----------------|-------------------------------|
| Length of Extensions | Interference With Operations/ Workload | Section 69 | Other | 9(1)(c) Third-Party Notice |
| 30 days or less | 2 | 0 | 0 | 0 |
| 31 to 60 days | 0 | 0 | 2 | 1 |
| 61 to 120 days | 0 | 0 | 0 | 0 |
| 121 to 180 days | 1 | 0 | 0 | 0 |
| 181 to 365 days | 0 | 0 | 0 | 0 |
| 365 days or more | 1 | 0 | 1 | 1 |
| Total | 4 | 0 | 3 | 2 |

Section 6: Fees

| | Fee | Fee Collected | | Fee Waived | Fee Refunded | | |
|-------------|-----------------------|---------------|-----------------------|------------|-----------------------|--------|--|
| Fee Type | Number of Requests | Amount | Number of Requests | Amount | Number of Requests | Amount | |
| Application | 11 | \$55,00 | 5 | \$25,00 | 0 | \$0,00 | |
| Other fees | 0 | \$0,00 | 0 | \$0,00 | 0 | \$0,00 | |
| Total | 11 | \$55,00 | 5 | \$25,00 | 0 | \$0,00 | |

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 | 2 | 33 | 0 | 0 |
| Outstanding from the previous reporting period | 0 | 0 | 0 | 0 |
| Total | 2 | 33 | 0 | 0 |
| Closed during the reporting period | 2 | 33 | 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

| | | Number | of Days Re | quired to Co | mplete Co | nsultation (| Requests | |
|---------------------------|-----------------|------------------|------------------|-------------------|--------------------|--------------------|-----------------------|-------|
| Recommendation | 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 |
| Disclose entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclose in part | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 2 |
| 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 | 2 | 0 | 0 | 0 | 0 | 0 | 2 |

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

| | | Number of Days Required to Complete Consultation Requests | | | | | | | | |
|---------------------------|-----------------|---|------------------|-------------------|--------------------|--------------------|-----------------------|-------|--|--|
| Recommendation | 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 | | |
| 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

| | | Than 100 rocessed | 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

| | | Than 100 rocessed | | | 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: Investigations and Reports of finding

9.1 Investigations

| Section 32 Notice of intention to investigate | Subsection 30(5) Ceased to investigate | Section 35 Formal Representations |
|---|---|--------------------------------------|
| 3 | 1 | 2 |

9.2 Investigations and Reports of finding

| | Section 37(1) Initial Reports | | S | Section 37(2) Final Reports | | |
|----------|---|---|----------|---|---|--|
| Received | Containing recommendations issued by the Information Commissioner | Containing an intent to issue an order by the Information Commissioner | Received | Containing recommendations issued by the Information Commissioner | Containing orders issued by the Information Commissioner | |
| 0 | 0 | 0 | 0 | 0 | 0 | |

Section 10: Court Action

10.1 Court actions on complaints

| | Section 41 | | | |
|-----------------|---|---|---|---|
| Complainant (1) | ainant (1) Institution (2) Third Party (3) Privacy Commissioner (4) Total | | | |
| 0 | 0 | 0 | 0 | 0 |

10.2 Court actions on third party notifications under paragraph 28(1)(b)

| Section 44 - under paragraph 28(1)(b) | |
|--|--|
| 1 | |

Section 11: Resources Related to the Access to Information Act

11.1 Allocated Costs

| Expenditures | | Amount |
|---|-----------|-----------|
| Salaries | | \$86 900 |
| Overtime | | \$0 |
| Goods and Services | | \$490 117 |
| Professional services contracts | \$490 117 | |
| • Other \$0 | | |
| Total | | \$577 017 |

11.2 Human Resources

| Resources | Person Years Dedicated to Access to Information Activities |
|----------------------------------|---|
| Full-time employees | 0,711 |
| Part-time and casual employees | 0,000 |
| Regional staff | 0,000 |
| Consultants and agency personnel | 0,844 |
| Students | 0,000 |
| Total | 1,555 |

Note: Enter values to three decimal places.

Appendix D: Supplemental Statistical Report

| * | Government of Canada | Gouvernement du Canada | | | |
|---------|-------------------------|---------------------------|--------------|-----------------------|------------------------|
| | | | | | |
| Suppl | emental S | tatistical Report on th | e Access | to Information Ac | ct and the Privacy Act |
| Name | of institution | : PSPIB and relevant who | ly-owned sub | sidiaries | _ |
| Report | ing period: | 2023-04-01 | to | 2024-03-31 | |
| Section | ı 1: Open Re | guests and Complaints Und | er the Acces | ss to Information Act | |

1.1 Enter the number of open requests that are outstanding from previous reporting periods.

| Fiscal Year Open Requests Were Received | Open Requests that are Within Legislated Timelines as of March 31, 2024 | Open Requests that are Beyond Legislated Timelines as of March 31, 2024 | Total |
|--|---|---|-------|
| Received in 2023-24 | 3 | 0 | 3 |
| Received in 2022-23 | 0 | 0 | 0 |
| Received in 2021-22 | 0 | 0 | 0 |
| Received in 2020-21 | 0 | 0 | 0 |
| Received in 2019-20 | 0 | 0 | 0 |
| Received in 2018-19 | 0 | 0 | 0 |
| Received in 2017-18 | 0 | 0 | 0 |
| Received in 2016-17 | 0 | 0 | 0 |
| Received in 2015-16 | 0 | 0 | 0 |
| Received in 2014-15 or earlier | 0 | 0 | 0 |
| Total | 3 | 0 | 3 |

Row 11, Col. 3 of Section 1.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-

^{1.2} Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

| Fiscal Year Open Complaints Were Received by Institution | Number of Open Complaints |
|--|------------------------------|
| Received in 2023-24 | 2 |
| Received in 2022-23 | 0 |
| Received in 2021-22 | 0 |
| Received in 2020-21 | 0 |
| Received in 2019-20 | 0 |
| Received in 2018-19 | 0 |
| Received in 2017-18 | 0 |
| Received in 2016-17 | 0 |
| Received in 2015-16 | 0 |
| Received in 2014-15 or earlier | 1 |
| Total | 3 |

Section 2: Open Requests and Complaints Under the Privacy Act

2.1 Enter the number of open requests that are outstanding from previous reporting periods.

| Fiscal Year Open Requests Were Received | Open Requests that are Within Legislated Timelines as of March 31, 2024 | Open Requests that are Beyond Legislated Timelines as of March 31, 2024 | Total |
|---|---|---|-------|
| Received in 2023-24 | 4 | 0 | 4 |
| Received in 2022-23 | 0 | 0 | 0 |
| Received in 2021-22 | 0 | 0 | 0 |
| Received in 2020-21 | 0 | 0 | 0 |
| Received in 2019-20 | 0 | 0 | 0 |
| Received in 2018-19 | 0 | 0 | 0 |
| Received in 2017-18 | 0 | 0 | 0 |
| Received in 2016-17 | 0 | 0 | 0 |
| Received in 2015-16 | 0 | 0 | 0 |
| Received in 2014-15 or earlier | 0 | 0 | 0 |
| Total | 4 | 0 | 4 |

Row 11, Col. 3 of Section 2.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

2.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.

| Fiscal Year Open Complaints Were Received by Institution | Number of Open Complaints |
|--|------------------------------|
| Received in 2023-24 | 0 |
| Received in 2022-23 | 0 |
| Received in 2021-22 | 0 |
| Received in 2020-21 | 0 |
| Received in 2019-20 | 0 |
| Received in 2018-19 | 0 |
| Received in 2017-18 | 0 |
| Received in 2016-17 | 0 |
| Received in 2015-16 | 0 |
| Received in 2014-15 or earlier | 0 |
| Total | 0 |

| Section 3: Social Insurance Number | | |
|--|-----|--|
| Has your institution begun a new collection or a new consistent use of the SIN in 2023-24? | No | |
| Section 4: Universal Access under the Privacy Act | | |
| How many requests were received from foreign nationals outside of Canada in 2023- 24? | 178 | Row 1, Col. 1 of Section 4 must be equal to or less than Row 1, Col. 1 of 1.1 of the 2023-24 Statistical Report on the Privacy Act |

Canadä