# ANNUAL REPORT TO PARLIAMENT ON THE PRIVACY ACT

Public Service Health Care Plan Administration Authority

April 1, 2024 – March 31, 2025

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#### 1. Introduction

#### 1.1 The Privacy Act

The *Privacy Act* (the Act) and its Regulations govern the collection, use, disclosure, correction, protection, retention, and disposal of personal information, including informing the public about the government institution's collection and use of personal information. The Act also provides individuals with a basic right of access to all of their personal information held by government institutions, subject only to the limited and specific exclusions and exemptions outlined in the Act.

The Act requires the head of every federal government institution to submit an Annual Report to Parliament on the administration of the Act following the close of each fiscal year. This report describes how the Federal Public Service Health Care Plan Administration Authority (the Administration Authority) fulfilled its privacy responsibilities during the reporting period of April 1, 2024, to March 31, 2025. The report has been prepared and will be tabled in Parliament in accordance with section 72 of the Act.

#### 1.2 The Federal Public Service Health Care Plan Administration Authority

The Federal Public Service Health Care Plan Administration Authority (the Administration Authority) is a corporation without share capital established under authority of the subsection 7.2(1) of *the Financial Administration Act* by letters patent issued by the President of the Treasury Board effective on May 1, 2007. Nine Directors and one Chairperson form its Board of Directors.

The Administration Authority is accountable to the Treasury Board of Canada and the Public Service Health Care Plan Partners Committee. The Partners Committee is composed of representatives of the employer, the portion of the National Joint Council of the Public Service which represents the employees, and an individual appointed by the National Joint Council who represents the pensioners.

The Administration Authority is charged with oversight of the Public Service Health Care Plan (the PSHCP). Its mandate is to ensure that benefits and services to members and their covered dependants, as defined in the PSHCP documentation, are delivered in a manner that ensures the effective and efficient administration of the PSHCP.

The PSHCP covers members who are federal public service employees, members of the Canadian Forces and the Royal Canadian Mounted Police (who can cover their dependants only), members of Parliament, federal judges, employees of a number of designated agencies and corporations, and persons receiving pension benefits based on service in one of these capacities, and members of the Veterans Affairs Canada client group, as well as eligible dependants of Plan members.

## 2. Organizational Structure

#### 2.1 The Access to Information and Privacy Office

The Access to Information and Privacy (ATIP) Office within the Administration Authority is responsible for administering the *Privacy Act*. During the period covered by this report, one full-time employee performed the administration of the Act on a part-time basis.

#### The ATIP Office:

- Develops corporate-wide access to information and privacy protocols, policies, procedures and practices to guide employees and senior officials on ATIP-related matters;
- Responds to access to information and privacy requests and to the consultations received from other institutions;
- Produces Annual Reports to be tabled in Parliament by the President of the Treasury Board;
- Produces and maintains the organization's *Info Source* chapter;
- Provides information about submission and completion of access to information requests on the Administration Authority website (www.pshcp.ca); and,
- Works with the Information Commissioner, the Privacy Commissioner, government departments and agencies, and other key stakeholders as required.

#### 2.2 Service Agreements

The Administration Authority was not party to any service agreements under section 73.1 of the *Privacy* 

# 3. Delegation Order

Delegation orders set out what powers, duties, and functions apply for the administration of the *Privacy Act*. These have been retained by the Chief Executive Officer (the CEO) of the Administration Authority acting as the head of the institution. The CEO oversees the administration of the Act within the Administration Authority and ensures compliance with it. The Benefits and Communications Manager has been appointed as the Access to Information and Privacy (ATIP) Coordinator of the Administration Authority.

### 4. Performance

The Administration Authority's Statistical Report on the Privacy Act and Supplemental ATIP Statistical Report are attached as an Appendix and cover the period between April 1, 2024, and March 31, 2025. Both reports have been validated by the Treasury Board of Canada Secretariat.

#### 4.1 Requests under the Privacy Act in 2024-2025

The Administration Authority received and processed 7 privacy requests during the period covered by this report, 100% of which were responded within legislated timelines.

#### Active requests and complaints

There were no active request or complaint that were outstanding from previous reporting periods during the period covered by this report.

#### 4.2 Multi-year Trends

The Administration Authority has received 42 privacy requests in the last five years. All of these requests were submitted by members of the public. Of these, 35 of the requested records did not exist, 3 were fully disclosed and 2 were partially disclosed.

#### 4.3 Disposition and completion time

All 7 cases submitted to the Administration Authority were closed during the reporting period within 30 days of receipt.

#### 4.4 Consultations received from other institutions and organizations

The Administration Authority did not receive any requests for consultations from other institutions or organizations during the reporting period.

#### 4.5 Percentage of records "all disclosed" and "disclosed in part"

During the reporting period, 3 of the requests were either "all disclosed" or "disclosed in part". This demonstrates that 43% of all requests received were fully disclosed or disclosed in part.

# 5. Training and Awareness related to the Privacy Act

No training specific to the Privacy Act took place for Administration Authority staff over the reporting period.

# 6. Policies, Guidelines, and Procedures

No new policies, guidelines or procedures related to privacy were implemented over the reporting period.

# 7. Initiatives and Projects to Improve Privacy

No new policies, guidelines or procedures related to privacy were implemented over the reporting period.

# 8. Summary of Key Issues and Actions Taken on Complaints or Audits

#### **Complaints to the Administration Authority**

The Administration Authority did not receive any complaints with regard to privacy during the period covered by this report.

#### Complaints to the Office of the Privacy Commissioner of Canada

There were no complaints under the *Privacy Act* filed with the Office of the Privacy Commissioner of Canada during the period covered by this report.

#### **Types of Complaints and Disposition**

Not applicable.

#### Applications / Appeals Submitted to the Federal Court of Appeal

There were no applications or appeals submitted to the Federal Court or the Federal Court of Appeal during the period covered by this report.

# The Administration Authority's Response to Recommendations raised by other Agents of Parliament

There were no recommendations raised by other Agents of Parliament during the period covered by this report.

# 9. Material Privacy Breaches

No material privacy breaches were reported to the Office of the Privacy Commissioner and to Treasury Board of Canada Secretariat (Information and Privacy Policy Division) during the reporting period.

# 10. Privacy Impact Assessments

The Administration Authority did not complete any PIAs during the reporting period.

#### 11. Public Interest Disclosures

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

# 12. Monitoring Compliance

The time taken to process access to information requests is documented on an individual basis by the staff members responsible for the file. The hours are compiled and tracked in a document used for year-end reporting purposes. Once a new request file is opened, the individual responsible for the file assesses the type of documentation being requested and the applicable records and provides an opinion to management as to whether time beyond the established 30-day response period may be required (e.g. for consultations with third parties or other government institutions). This assessment is conducted on a case-by-case basis.

# Appendix

# Statistical Report on the ACCESS TO INFORMATION ACT April 1, 2024 – March 31, 2025

#### And

Supplemental Statistical Report on the ACCESS TO INFORMATION ACT April 1, 2024 – March 31, 2025



# Statistical Report on the *Privacy Act*

Name of institution: The Federal Public Service Health Care Plan Administr

**Reporting period:** 2024-04-01 to 2025-03-31

# Section 1: Requests Under the *Privacy Act*

#### 1.1 Number of requests received

		Number of Requests
Received during reporting period	7	
Outstanding from previous reporting periods	0	
Outstanding from previous reporting period	0	
Outstanding from more than one reporting period	0	
Total		7
Closed during reporting period		7
Carried over to next reporting period		0
Carried over within legislated timeline	0	
Carried over beyond legislated timeline	0	

#### 1.2 Channels of requests

Source	Number of Requests
Online	7
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	7

# Section 2: Informal requests

# 2.1 Number of informal requests

		Number of Requests		
Received during reporting period	0			
Outstanding from previous reporting periods	0			
<ul> <li>Outstanding from previous reporting period</li> </ul>	0			
<ul> <li>Outstanding from more than one reporting period</li> </ul>	0			
Total	Total			
Closed during reporting period	0			
Carried over to next reporting period	0			

# 2.2 Channels of informal requests

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

# 2.3 Completion time of informal requests

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

# 2.4 Pages released informally

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

# Section 3: Requests Closed During the Reporting Period

# 3.1 Disposition and completion time

	Completion Time							
Disposition of Requests	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	3	0	0	0	0	0	0	3
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	4	0	0	0	0	0	0	4
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	7	0	0	0	0	0	0	7

# 3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)		22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0

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

#### 3.3 Exclusions

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

#### 3.4 Format of information released

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

# 3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
47	47	3

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

Less Than 100	100-500	501-1000	1001-5000	More Than 5000
Pages Processed				

Disposition	Number of Requests	Pages Processed								
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	3	47	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	3	47	0	0	0	0	0	0	0	0

# 3.5.3 Relevant minutes processed and disclosed for <u>audio</u> formats

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

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

	Less than 60 Minutes processed		60-120 Minutes p	rocessed	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
Total	0	0	0	0	0	0

#### 3.5.5 Relevant minutes processed and disclosed for <u>video</u> formats

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

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

	Less than 60 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
Total	0	0	0	0	0	0

# 3.5.7 Other complexities

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

# 3.6 Closed requests

# 3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	7
Percentage of requests closed within legislated timelines (%)	100

#### 3.7 Deemed refusals

# 3.7.1 Reasons for not meeting legislated timelines

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

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

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

# 3.8 Requests for translation

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

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

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

# Section 5: Requests for Correction of Personal Information and Notations

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

# Section 6: Extensions

#### 6.1 Reasons for extensions

		15(a)(i) Interferenc	e with operations		15 (a)	(ii) Consu	Itation	
	Further review							15(b)
	required to				Cabinet			Translation
	determine	Large volume of	Large volume of	Documents are	Confidence			purposes or
Number of extensions taken	exemptions	pages	requests	difficult to obtain	(Section 70)	External	Internal	conversion
0	0	0	0	0	0	0	0	0

## 6.2 Length of extensions

15(a)(i) Interference with operations	15 (a)(ii) Consultation	
1	( )( )	

Length of Extensions	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence (Section 70)	External	Internal	15(b) Translation purposes or conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

# Section 7: Consultations Received From Other Institutions and Organizations

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

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

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

	N	umber of l	Days Requi	red to Co	mplete Co	nsultation	Reques	ts
Recommendation	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 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

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

	ı	Number of	days requi	red to co	mplete coi	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	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

# Section 8: Completion Time of Consultations on Cabinet Confidences

# 8.1 Requests with Legal Services

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

More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

#### 8.2 Requests with Privy Council Office

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

# Section 9: Complaints and Investigations Notices Received

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

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

#### **10.1 Privacy Impact Assessments**

Number of PIAs completed	0
Number of PIAs modified	0

# 10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	1	0	0	0
Central	0	0	0	0
Total	1	0	0	0

# **Section 11: Privacy Breaches**

# 11.1 Material Privacy Breaches reported

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

# 11.2 Non-Material Privacy Breaches

on-material privacy breaches 0
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# Section 12: Resources Related to the Privacy Act

#### 12.1 Allocated Costs

Expenditures		Amount
Salaries		\$1,400
Overtime	\$0	
Goods and Services		\$0
Professional services contracts	\$0	
Other	\$0	
Total		\$1,400

#### 12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.020
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	0.020

Note: Enter values to three decimal places.