



Department of Justice  
Canada

Ministère de la Justice  
Canada

Public Law Sector  
Official Languages Directorate  
350 Albert Street, Ottawa, ON

MEMORANDUM / NOTE DE SERVICE

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File number -- Numéro de dossier <b>9500697</b>
Date <b>May 2<sup>nd</sup>, 2018</b>
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**Access to Information and Privacy Protection Division**  
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**Justice Canada**

SUBJECT / OBJET:

Comments/Remarques

**I. Issue**

**II. Short Conclusion<sup>5</sup>**

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**Pages 2 to / à 9  
are withheld pursuant to section  
sont retenues en vertu de l'article**

**23**

**of the Access to Information Act  
de la Loi sur l'accès à l'information**

Solicitor-Client Privilege

We trust this legal advice is useful to you. Please do not hesitate to communicate with us if you have any questions or comments.

Rana El-Khoury

cc:

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## Lauzon, Dominique

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**From:** Kong, Barry  
**Sent:** November 19, 2021 9:46 AM  
**To:** Lauzon, Dominique; Cullen, Matthew  
**Subject:** PO Briefing - Qs and As for Sonya  
**Attachments:** PO Briefing - Questions and Answers - 2021-11-18.docx

PROTECTED B / PROTÉGÉ B

Thank you very much for your help yesterday. Here is the final product and Sonya extended her thanks.

## PO Briefing – Questions and Answers

## ATIP Online

Q. Why do we need to **collect the SIN**? / How will use the SIN?

A. Some institution who use ATIP Online have legislated programs that use the SIN for their file management (CRA personal income tax, ESDC Employment Insurance, ESDC CPP, ESDC OAS...). TBS will collect the SIN through ATIP Online and then transmit it to those institutions who need the SIN to retrieve the correct information to be able to respond to requests for personal information. TBS will not use nor be able to access directly the SIN.

Q. Why aren't **all institutions** already **using ATIP Online**?

A. There are currently over 220 institutions using ATIP Online. Approximately 55 institutions, including most of the larger intuitions, remain to be onboard. While some institutions have specific concerns that need to be addressed before they will onboard (e.g. CBC must operate independently from the Government), most institutions are waiting for the Version 3 of the platform (with secure accounts and e-delivery functionality) to be implemented before they join.

Q. What is the volume of ATIP requests being processed through ATIP Online?

A. Currently TBS's ATIP Online Request Service is operational along side the IRCC pilot ATIP Online site. Of all electronic requests received by the GC, TBS's AORS processed: 2018-19 – 1.1%; 2019-20 – 5.1% and 2020-21 – 7.9%.

IRCC has the highest volumes of requests being processed through their pilot ATIP Online site.

Q. Why has **Version 3 been delayed** so much?

A. Earlier delays are directly attributable to the pandemic. For the last year, the projects team has been focused on the finding the right credential management solution for Version 3. As you can imagine, a platform that holds so much personal information, must provide strong reassurance that access controls will be maintained. We are currently working with Cyber Security to develop the first Enterprise multi-factor authentication that will help prevent security breach like the one experienced in 2020.

Q. How much as been already invested in ATI over the last several years?

A. TBS has received approximately \$30M over the last 6 years from Budget 2016 (Enhancing ATI - \$11.5M and Open Government - \$11.5M) and from an [REDACTED] in 2017 (Phase I improvements to ATI - \$7M).

From a technology standpoint, ATIP Digital Services has received approximately \$11M over the last 6 years and \$1.3M ongoing to build ATIP Online and complete procurement of request processing Software solutions. The OG Portal has received \$3.1 over 5 years and \$0.6M ongoing to manage the OG Portal.

Q. What specifically are you delivering for \$14.2M?

## PO Briefing – Questions and Answers

- A. ATIP Online (\$5.9M over 3 years) - Add critical additional functionalities to improve the ATI process including **e-delivery of responses to eliminate paper and CD-ROMs**, which have been a key irritant for requesters and caused delays in the COVID-19 context; ability for **citizens and institutions to track requests** through a **dashboard**; and, accelerate internal processing of files by providing **secure two-way communications between institutions and requesters**; and enabling institutions on the platform to **communicate and share documents securely with each other**, which will significantly **facilitate consultations** on proposed response packages between institutions

Proactive Release of Info (\$3.1M over 3 years) - Develop **automated process** to enable Canadians to **access previously released access to information request responses online**, without the need for a request to an institution and develop and **provide tools, guidance and support** to institutions to **automate proactive disclosure** (e.g. setting up systems to directly feed more data and information to the Open Government Portal)

Enhance performance monitoring and reporting (\$1M over 2 years) - **Standardize performance targets** for on-time requests and **completion of consultation requests across government** and **publish robust dashboards**; increase TBS capacity to **analyze institutional data** and work with institutions to **meet performance targets** and provide additional data to support **trend analysis** by TBS.

ATI Review (\$4.2M over 2 years) – comprehensive examination of issues across the 3 identified streams; open, accessible and inclusive engagement process; development of recommendations and policy options for reforming the ATI System including

  


## PO Briefing – Questions and Answers

## OG Portal

**Q.** Why can't we simply publish access to information response packages?

**A.**

Given the volume of pages and records processed under the *Access to Information Act* (32.6M pages in 2019-20) it is not possible, using available tools and services, to translate these records and convert them to accessible formats. This initiative explores potential new tools and processes to improve accessibility and the translation of previously released records.

**Q.**

**A.**

The design work for the solution will also explore potential measures to address automated translation and accessibility.

To guide the research, analysis and implementation of this work, TBS has put in place a multidisciplinary working group that is led by TBS-OCIO-Open Government Division and consists of representatives from Legal Services, Privacy, Security, Accessibility policy, Official Languages and the Information and Privacy Policy Division. The working group will work with stakeholders such as the Office of the Commissioner of Official Languages, the Office of Public Service Accessibility, the Translation Bureau and other Government of Canada institutions who may be exploring similar initiatives related to translation and accessibility. As part of research and analysis, TBS will hire a consultant to find viable solutions that can be utilized to automate translation and accessibility. This research would contribute to the design of a minimum viable product (MVP) that will allow for extensive user testing with Canadians and with institutions in order to inform the usability of the product. The user experience testing will be contracted to an external company that has conducted testing for the TBS previously.

The MVP will be implemented incrementally in a pilot, layering on top of that, a process that could offer machine translation, supported by editors from the Translation Bureau.

Once implemented, rigorous monitoring of access and user feedback during the pilot will take place so that we are able to measure any shifts in the amplitude of the risk identified by Legal Services for this initiative and also to adapt the MVP to any new requirements easily.

**Q.** How many hits on your ATI Summaries page and informal requests do you get through the OG Portal?

**A.** The search pages for summaries of previously released ATI packages receives approximately 250K page views per month. In 2019-20, there were over 14.2K informal requests and in 2020-21, there were over 10.3K informal requests.

## PO Briefing – Questions and Answers

Q. How many summaries are published?

A. Approximately 1,000 ATI Summaries are published per month.

Q. What are the advantages of publishing data through an application programming interface (API)?

A. There are several advantages to leveraging APIs on the OG portal to publish open data or proactive publications. The main advantage is that a dataset can be updated directly from the source data at the publishers desired frequency, without human intervention. This ensures timely publication and data integrity. By pushing data through an API, there is minimal ongoing cost, regardless of the frequency of updates.

To promote API usage for data and proactive publication, we have had one GC wide workshop, as well as individual support sessions with departments. There were over 500 attendees for our API workshop, and we plan on having future sessions that target specific user groups (program areas or IT shops).

### *General Portal Statistics:*

- Approximately 220,000 site visits per month
- Approximately 110,000 downloads per month

APPROACH 1 : Using OPQ response development estimate

Question: Estimated cost to post completed release packages on the web?

Background and Methodology:

- ATI release
  - Approximately 6,566,287 **pages** were disclosed in full or in part in 2015-16.
- Translation
  - Translation Bureau charges approximately \$0.30 per word for translation.
  - Approximately 250 words per page (general industry standard).
  - Approximately \$75 per **page** for translation.
- Web posting/accessibility
  - Cost for OPQ response development is approximately \$60/hr (or \$1/min) per employee.
  - SCMS estimates approximately 90 hours of employee spent on web posting (including accessibility) for approximately 80 pages (briefing binder example), working out to approximately 68 minutes of work per page.
  - Approximately \$68 per **page** for web posting, including accessibility.
- Please note that no other ATI costs (reviewing documents prior to release, collection of documents, etc) are included in the draft estimation.

Draft Estimation:

- Draft estimated cost of **\$143** per page to post completed release packages.
- Draft estimated cost of **\$938,979,041** per year to post completed release packages on the web.

APPROACH 2 : Web team's breakdown of the time and tasks needed to release a package

The information below allows us to produce draft estimates of the cost per page to post completed release packages.

Of particular interest at this point is the fact the size of the package matters when calculating this estimate. Whatever the size of this package, part of the workload doesn't change in terms of the time it takes to complete it. Taken individually, that means a smaller package would have a higher \$ per page ratio and bigger package would have a smaller ratio (economy of scale)

**This estimate can therefore be used as a proxy to track the real average cost per page**, which could itself be better approximated if we analyzed more than one sample (especially if we were to include small and large packages in this sample)

- ATI release
  - Approximately 6,566,287 **pages** were disclosed in full or in part in 2015-16.<sup>1</sup>
  -
- Translation
  - Translation Bureau charges approximately \$0.30 per word for translation.<sup>2</sup>
  - Approximately 250 words per page.<sup>3</sup>
  - Approximately \$75 per **page** for translation.<sup>4</sup>
- Web posting/accessibility
  - Cost for response development is on average \$30.81\$/hr (or 0.5135\$/min) per employee.<sup>5</sup>
  - SCMA estimates approximately 91 hours of employee spent on web posting (including accessibility) for approximately 80 pages (briefing binder example), working out to approximately 68 minutes of work per page.<sup>6</sup>
  - Approximately 34.92\$ per **page** for web posting, including accessibility.<sup>7</sup>
- Please note that no other ATI costs (reviewing documents prior to release, collection of documents, etc.) are included in the draft estimation.

Draft Estimation:

- Draft estimated cost of **2803.27\$** to post an a completed average-sized package
- Draft estimated cost of **\$145** per page to post completed release packages.
- Draft estimated cost of **\$952,111,615** per year to post completed release packages on the web.

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<sup>1</sup> ATI Privacy Summaries 2015-2016

<sup>2</sup> INSERT REFERENCE

<sup>3</sup> General industry standard

<sup>4</sup> 0.30\$ x 250 = 75\$

<sup>5</sup> See page 2

<sup>6</sup> 91 / 80 = 1.1375 hour per page (or 68min)

<sup>7</sup> 68 min x 0.5135 \$/min = 34.92\$ per page = 70\$ bilingual

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TBS Web	4 days	30 hours	CS01 : 61350\$/yr	31.46\$/hr	943.80\$
Desktop Publishing	5 days	37.5 hours	GT02 : 50069\$/yr	25.67\$/hr	962.63\$
Multimedia	1 day	7.5 hours	GT04 : 63284\$/yr	32.45\$/hr	243.38\$
E-Comms	2 days	15 hours	IS04 : 79087\$/yr	40.56\$/hr	608.40\$
Strategic Communications Review	1 hour	1 hour	IS05 : 87876\$/yr	45.06\$/hr	45.06\$
<b>TOTAL</b>	<b>12 days</b>	<b>91 hours</b>			<b>2803.27\$</b>

2803.27\$ / 91 hr = 30.81\$/hr

## Posting Copies of Completed Requests Online

April 21, 2016

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**ISSUE/QUESTION:** Will the Government proactively post copies of previously completed access to information requests online?

### **BACKGROUND:**

- Federal institutions are currently required to post summaries of completed requests that do not contain personal or business information to the Open Government Portal. In line with government retention period requirements, the summaries remain on the portal for two years. The summaries can be searched, and a user can make a request online for a copy of the previously released records. The summaries are posted in both languages.
- Presently, over half of institutions subject to the *Access to Information Act* are fully compliant with this recently-introduced requirement. The Treasury Board of Canada Secretariat is actively working with institutions to improve compliance.
- There have been a number of proposals, including from the private sector, to post completed access to information requests online. However, in the federal context, posting completed access to information requests online by government institutions poses certain challenges. In particular, the complete response package would need to be posted in both English and French to comply with *Official Languages Act* requirements. As well, all published material must meet Government accessibility criteria for visually impaired users. Given that the Government responds to more than 65,000 requests annually, meeting official languages and accessibility standards for posting full response packages online would have significant cost implications.
- Other issues such as copyright and consent to release third party or personal information would also need to be addressed.
- The governments of Quebec, BC, and Newfoundland & Labrador post copies online with personal and third party information exempted.
- In 2015, the Alberta government halted immediate plans to post copies of completed requests online following criticism from the province's Information and Privacy Commissioner that doing so would increase the risk of privacy breaches and disclosure of copyrighted materials and confidential business information. Opposition parties and the media were also critical that this new initiative would eliminate "scoops" and undermine long-term investigations.
- TBS continues to examine options for addressing official languages and accessibility considerations to enable federal institutions to post completed response packages online.

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## **SUGGESTED RESPONSE:**

- **This is an issue we are continuing to look at.**
- **Presently, institutions post summaries of completed requests that do not contain personal or business information to the Government's Open Government portal.**
- **The summaries can be searched and once a user has found a summary of interest, the individual can make an online request for a copy of the previously released records.**
- **To post full responses online, we would need to ensure we are respecting official languages and accessibility requirements, as well as privacy and copyright issues.**
- **We are continuing to explore how this could be done.**

## Posting Completed Requests Online

September 28, 2017

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**ISSUE / QUESTION:** Has the Government considered posting completed access to information request packages online?

**BACKGROUND:**

- Presently, summaries of access to information response packages that do not contain personal or business information are available on open.canada.ca or on institutions' websites. In line with government information retention period requirements, the summaries remain on the portal for two years. The summaries can be searched, and a user can make a request online for a copy of the previously released records. The summaries are posted in both official languages.
  - Under the ATIA, the records released to a requester are provided in the language of origin. However, if the records are to be published, other requirements apply.
  - There have been a number of proposals, including from the private sector, to post the complete response package to access to information requests online (as opposed to summaries). At the provincial level, for example, the Government of Quebec posts complete response packages online with personal and third party information exempted (they are posted in one language).
  - However, at the federal level, publishing a complete response package would require it to be translated and formatted for web-accessibility for persons with disabilities to comply with constitutional, statutory and policy obligations relating to official languages and equality rights.
  - At the federal level, publishing a complete response package would require it to be translated to comply with official languages requirements, as well as formatted to meet constitutional obligations for web-accessibility for persons with disabilities. Given that the Government in 2015-16 responded to more than 75,000 requests annually, meeting these publishing requirements would have significant cost implications, estimated at least \$939M annually.
  - The Government of Canada Policy on Communications and Federal Identity requires that when communicating with the public, information must be provided in both official language in accordance with the relevant sections of the *Official Languages Act* and must provide published information that is substantially equal for people with disabilities in accordance with the Standard on Web Accessibility. A completed ATI request posted online would therefore need to be made available in both official languages, not just posted in the language in which the original records were written and be web-accessible for persons with disabilities.
  - TBS is developing a new online request services and will explore ways to make it easier to search summaries of completed requests as part of that project.
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## **SUGGESTED RESPONSE:**

- **I know there have been a number of proposals suggesting that the Government should post all completed access to information requests online.**
- **The government is committed to ensuring that anything that is published is both accessible to people with disabilities and available in both official languages. Our completed ATI requests don't meet this standard.**
- **We're currently making ATI response package summaries available on open.canada.ca or on institutions' websites and, upon request, the completed package can be provided. This approach seems to be working.**
- **For now we will continue to post summaries in both official languages and ensure that a high level of Web accessibility is applied.**
- **We will continue to look at ways to make this work even better.**

## **RÉPONSE SUGGÉRÉE :**

- **Je sais qu'il y a eu plusieurs propositions selon lesquelles le gouvernement devrait mettre en ligne toutes les demandes d'accès à l'information complétées.**
- **Le gouvernement s'engage à ce que toute publication en ligne soit accessible également aux personnes handicapées et dans les deux langues officielles. Les demandes d'accès à l'information complétées ne respectent pas cette norme.**
- **À l'heure actuelle, nous veillons à ce que les sommaires des réponses aux demandes d'accès à l'information soient disponibles sur le site ouvert.canada.ca ou sur les sites Web des institutions. De plus, les ensembles de documents des demandes complétées peuvent être fournis sur demande. Cette approche semble fonctionner.**
- **Pour le moment, nous continuerons d'afficher les sommaires dans les deux langues officielles et nous veillerons à ce qu'un niveau élevé d'accessibilité des sites Web soit appliqué.**
- **Nous continuerons d'examiner les moyens d'améliorer davantage ce travail.**

## Posting Completed Requests Online

September 6, 2018

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**ISSUE / QUESTION:** Has the Government considered posting completed access to information request packages online?

**BACKGROUND:**

- Presently, summaries of access to information response packages that do not contain personal or business information are available on open.canada.ca or on institutions' websites. In line with government information retention period requirements, the summaries remain on the portal for two years. The summaries can be searched, and a user can make a request online for a copy of the previously released records. The summaries are posted in both official languages.
  - Under the ATIA, the records released to a requester are provided in the language of origin. However, if the records are to be published, official languages and web-accessibility requirements apply.
  - There have been a number of proposals, including from the private sector, to post the complete response package to access to information requests online (as opposed to summaries). At the provincial level, for example, the Government of Quebec posts complete response packages online with personal and third party information exempted (they are posted in one language).
  - However, at the federal level, publishing a complete response package would require it to be translated to comply with official language requirements and formatted for web-accessibility for persons with disabilities to comply with constitutional and policy obligations relating to equality rights.
  - Given that the Government in 2016-17 responded to almost 87,000 requests, meeting these publishing requirements would have significant cost implications, estimated more than \$900M annually.
  - TBS is developing a new online request service and is exploring ways to make it easier to search summaries of completed requests as part of that project.
-

## **SUGGESTED RESPONSE:**

- **I know there have been a number of proposals suggesting that the Government should post all completed access to information requests online.**
- **The government will ensure that anything published is both accessible to people with disabilities and available in both official languages. Our completed ATI requests don't meet this standard, since they are released in the language in which the record is prepared.**
- **We're making summaries of ATI responses available on open.canada.ca and institutions' websites. Upon request, the completed package is provided.**
- **For now we will continue to post summaries in both official languages and ensure these are accessible to all**

## **RÉPONSE SUGGÉRÉE :**

- **Je sais qu'il y a eu plusieurs propositions selon lesquelles le gouvernement devrait mettre en ligne toutes les demandes d'accès à l'information complétées.**
- **Le gouvernement veillera à ce que toute publication en ligne soit accessible également aux personnes handicapées et dans les deux langues officielles. Les demandes d'accès à l'information complétées ne respectent pas cette norme, puisqu'elles sont communiquées dans la langue dans laquelle le document a été rédigé.**
- **Nous publions les sommaires des réponses aux demandes d'accès à l'information sur le site ouvert.canada.ca ou sur les sites Web des institutions. Les ensembles de documents des demandes complétées sont fournis sur demande.**
- **Pour le moment, nous continuerons d'afficher les sommaires dans les deux langues officielles et nous veillerons à ce qu'ils soient accessibles à tous.**

**Pages 27 to / à 95  
are withheld pursuant to section  
sont retenues en vertu de l'article**

**69(1)(a)**

**of the Access to Information Act  
de la Loi sur l'accès à l'information**

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**Initiatives underway to improve access to information**

Institution	Description	Status/Next steps
CRA	<p><b>New organizational structure</b> New organizational structure approved February 2021 to meet operational demands. Includes the addition two new EX-01s, this is in addition to an EX-02.</p>	
	<p><b>Increased funding</b> \$4 million increase in overall ATIP budget since 2016-2017.</p>	
	<p><b>Supporting compliance</b> During the COVID pandemic, Intake employees work onsite to support the ATIP program. ADM presents monthly statistical report at the Commissioner chaired Corporate management Committee. COVID and complaints dashboard provided to ADM on a weekly basis.</p>	
	<p><b>Templates</b> We have integrated wording from TBS letters into our standard letters; as well, we monitor compliance on a weekly basis and, if a file goes late without sending letter at the time, we are able to provide reminders to the analysts to correct the oversight.</p>	
	<p><b>Corporate business plan and performance agreements</b> Strengthening trust, through enhanced security, transparency and accountability included in Corporate Business Plan and DM and ADM performance agreements</p>	
	<p><b>ATIP modernization project</b> Recruited seasoned executive in the fall of 2020 on a two year interchange to lead an ATIP Modernization Project. Reviewing business operations and processing using Lean Methodology to ensure that we are maximizing our use of resources and improve compliance times. We are working with OPIs within the organization to improve compliance. Working with other departments (e.g. RCMP) that are undergoing modernization efforts to share best practices. Last meeting was in February 2021.</p>	

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Institution	Description	Status/Next steps
	<p>Improving tools, software and hardware to improve efficiencies. This includes projects such as:</p> <ul style="list-style-type: none"> <li>• <b>E-fax:</b> Digitization of incoming faxes to avoid using a paper based system.</li> <li>• <b>Digital Mailroom Project:</b> Digitization of incoming mail that will allow analysts to receive mail electronically that will avoid the need to enter CRA buildings.</li> <li>• <b>Dethrottling of Network accesses:</b> ITB had restricted data transfer rates to remote users that were not listed on the business continuity plan; after the ATIP Directorate was added to the plan, IT removed the throttling and thus improved network speeds for ATIP processing.</li> <li>• <b>Audio Visual Redaction software:</b> Procuring software to allow ATIP to redact audio-video media to improve compliance with ATIP legislation</li> <li>• <b>GSCI access:</b> Working to allow CRA ATIP analysts access to GSCI to work on secret documents more effectively.</li> <li>• <b>epost Connect:</b> To improve our ability to provide requesters with a digital package as well as work remotely.</li> <li>• <b>Case management solution :</b> Waiting for TBS to identify a solution that will improve our ability to process requests.</li> <li>• <b>Improved Analytics:</b> Working to improve our ability to do trend analysis and identify key performance indicators</li> </ul>	
HC	<p><b>Strengthening intake into the ATIP Community</b></p> <p>Launch ATIP-specific stream for inter-departmental Post-secondary recruitment through the Public Service Commission portal, with emphasis on strong analytical skills and bilingual capacity. Process launched October 2019, completed December 2020. List available to other departments starting January 2021. Process launched October 2020 underway. Results expected by summer 2021, with qualified list expected to be approximately 100 bilingual (BB) candidates. Preliminary discussions held with Public Service Commission (PSC) to establish ability for them to run annual fully-assessed pool to meeting ongoing community needs, similar to what is done for the PE community." "Next steps" would be "Secure PSC willingness to undertake annual ATIP staffing, building on HC-led stream, for upcoming 2021 PSR launch. Complete ongoing 2020 PSR process and share list with departments (priority given to departments assisting with assessment of candidates).</p>	<p>Work on students that can also be important to support departments. Many departments do annual recruitment for students, and as a community we did have some discussions with a few colleges to explore the possibility of aligning for a co-op, or recognised program. Some meetings took place, but of course we are doing this corner of desk with all of our other urgencies and priorities. While not much has happened inter-departmentally (that I know of), it should not be ignored. There is good departmental experience and great ideas and some nuggets of work that's been done. We've figuratively dipped our toe in the ocean, but I don't think much more. For now, we all do our own thing, but there is potential on this front, especially if we can get the PSR intake looked after by the PSC.</p>

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Institution	Description	Status/Next steps
HC & CRA	<p><b>Collaboration with AAPI</b></p> <p>Collaborated with Quebec information association AAPI to explore leveraging their training program at the federal government level. AAPI's program has formal certification from UQAM, with successful implementation in Quebec. Contributed to review and adaptation of training material to federal context and supported launch of pilot french program in 2019 (along with several other federal institutions). Feedback provided and re-design underway to address comments and new virtual environment, as well as translation into both official languages.</p>	<p>Await AAPI re-design to identify level of support and nominate participants to assess value and effectiveness of the program for training needs for junior and intermediate Analysts.</p>
HC	<p><b>Capacity building</b></p> <p>The key to building the community capacity has three main tenets: 1) recruit, 2) train and develop (both the community-wide baseline training, and then the deeper institution specific more detailed training), and 3) promote and retain. We've spoken about recruitment, and our community efforts at training. For me, one of the key pieces to this working efficiently is our Professional Development Program. I've introduced one in each of the three departments I've been at, and it has been a very important tool for the efficient progression of employees and to attract and retain. It operates differently in large versus very small departments, but can function well and be useful in either, in my view. On the PDP front, several departments have programs, and have updated their programs. Those who have them are open to sharing and regularly do share. And a few years ago I had organized a session to discuss pros/cons, lessons learned etc and I continue to get enquiries and share experiences with others, and I'm certain that my colleagues do the same. Having a program helps employees know that there is a career path for them to progress, and helps them know what competencies they need to work in to get there. If an employee knows that they will be promoted when they can demonstrate they have the necessary competencies, without waiting for a competition (which are time consuming to do, so are only done from time to time), then they are more likely to be attracted to that department, and more likely to stay and not look elsewhere. It's far from a guarantee, but it helps stabilize an organisation as much as possible in a high-turnover environment.</p>	
TC	<p><b>Remote work for non-secret files</b></p> <p>TC is launching a satellite ATIP Office in Mtl as of April 1, 2021 to recruit new resources from a new and diverse bilingual workforce. This project addresses both</p>	

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Institution	Description	Status/Next steps
	recruitment and retentions issues experienced in Ottawa by federal institutions. The initiative's success will be assessed after one year to determine whether it can be expanded. TC already has a regional office in Mtl that can be used for team meetings on a regular basis, although ATIP employees will be working mainly remotely. GC Coworking sites planned for Mtl will also be used as required. Mtl's proximity	

**Comments and questions: other related initiatives**

Institution	Initiative	Comment
CRA	Recruitment/HR	The CRA participated in the horizontal post secondary recruitment initiative and the Agency was one of the leading adopters of this initiative and a member of the ATIP Coordinator working group. We are anxious to see this initiative get off the ground, specifically with respect to recruiting.
TC		I suggest the sub items be moved to future actions given delays encountered (CDO) A development program is particularly important for this community because it's challenging to recruit a PM-03 or PM-04 from another field, it seems to work best to train them from junior to senior given the very specific expertise ATIP requires. I would think that in that sense we are similar to the FI community.
PSPC		I think this is important piece to build our community, consider a classification for ATIP experts, support and advance common issues, including the training etc. One of the issues we face is retention and recognition of complexity of departments and levels also. Some of us were reclassified but we need to have a diverse mandate in order for any recognition of the impact of the ATIP program and the accountability we and our teams have. Similar sectors which do not have a legislative mandate (evaluation risk and audit) have classifications that are higher than those of our team... this has a major impact on moral attraction and retention.
CRA	AORS	Due to delays in the launch of the completed AORS system; the CRA has opted to remain on the IRCC request portal and to return packages via epost Connect.
CRA	Secure remote access	The CRA is setting up a secure secret server hub to meet the requirements for processing secret documents
TC		The next step on deployment at GCcoworking sites is beneficial but may not resolve issues during lockdowns and restricted access to federal buildings.
TC	ATI summaries	Is funding requested for translation of each release package because it will be online or is it for the functionality only?
TC	Formats	I would refrain from suggesting that an obligation to provide paper exists even when access has been provided by electronic means confirmed to be used by the requester.
HC		I would not formally concede obligation that paper based access must be provided in order to fulfill responsibilities, especially if other forms of access have been achieved.

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Institution	Initiative	Comment
PSPC		I agree especially where there is a risk to health and safety of either our employees or Canadians (on-site work is required for paper format risk for employees or Public Health obligations i.e. lockdown— and sending to Canadian can be of some risk) Also, requesters must cooperate in receiving their responses and be opened to alternative formats during these times. Where departments have made efforts to propose mechanisms for them to receive and either they gained access or refused, we should not be held accountable
TC	Automated search	Interesting initiative, TC tried in 2020 with APCM and it was not feasible given non-flexible software environment. Very interested in outcomes. On the other hand, with the hope of new modern software, we established that investment in tailored solutions for APCM may not be worth it.
HC	Posting of release packages	This should be achieved through exception to requirement for translation and satisfying accessibility requirements. The format requirements should be consistent with what we need to provide under ATI. The added burden would be significant. It should replace Access Informal frameworks and not be considered the same as normal "publication". If we could have people automatically access/download, that would be highly efficient.
PSPC		PSPC is looking at this and how it can be achieved in respect of OL obligations in light of ATIA requirements. We have developed the PSPC Approach to Transparency and Openness where we will be proactively publishing data/documents that Canadians wish to see. ATIP requests are a starting point: Complete BNs and also reports for call ups and requests are next. Also, PSPC has published lists of contracts for pandemic support. (we will be adding this to our notes for the minister)
HC	ePost	TBS activities to secure confirmation that ePost was approved to Protected B?
HC	Automation	IRCC has done some innovation as well, sharing with the community ways to automate steps in the process for entering or processing requests.
HC	ATIP Coordinators Working Group	The group has enabled us to collaborate and share or identify issues/challenges, share best practices and possible solutions/approaches. Importantly, TBS has been very active in sharing information with the Working Group members, and at times gathering input to help refine products or validate information/approaches. It would appear (though you would need to validate) that participation in this forum has enabled IPPD to be aware of issues or trends fairly quickly (more timely) enabling IPPD to be more nimble and responsive to issues affecting the community.
TC		The group is essential. It helps new Coordinators joining this field and it's a great source of information-sharing for best practices and lessons learned, and to develop common solutions to new challenges (e.g. motions, certain requests/QPs to multiple institutions, etc.).

s.21(1)(a)

s.21(1)(b)

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### Summaries of Completed Access to Information Requests on Open Government Portal

#### Facts and Context

- For how long are summaries of completed access to information (ATI) requests retained on the Government of Canada's Open Government portal?
  - The retention period for most records related to the processing of ATI requests, including final response packages, is generally two years.
  - These summaries are published on the Open Government portal, sorted by department and date. Each brief summary reflects the topic of a group of related documents and has a link to [get-a-free-request](#) copy.
- Why are summaries of the completed ATI requests removed after two years?
  - Federal institutions' retention and disposition policies are guided by Library and Archives Canada's *Generic Valuation Tool* according to which summaries of the completed ATI requests should be retained for a period of two years.
  - The Open Government portal is set up to remove summaries after the 2-year period has elapsed, following the Library and Archives Canada's *Generic Valuation Tool*, as the records may no longer be held by the responsible institution after that time.
- How often are summaries of ATI requests removed from the portal?
  - Removal is done on a monthly basis. There are generally 1,200 to 1,400 records of documents a month.
  - Automated removal of the ATI summaries has been a feature since the Open Government portal took on the publishing of ATI summaries in 2013.
  - At the time of writing (December 2020), summaries from the first 11 months of 2018 and everything prior has been removed.
  - In total, this year over 10,000 summaries of completed ATI requests have been removed from the portal.

#### Challenges and Impacts

- Removal of ATI summaries from the portal after two years poses challenges for professional researchers, historians, scientists, journalists and ordinary people alike who may be unaware of previous requests made more than two years earlier and may unknowingly duplicate a request, or simply never know about certain government information.
- The pandemic may have reduced the opportunity to visit archives in person and hence the removal of ATI summaries from the online portal could put a strain on people in accessing relevant information.
- The Open Government portal retains the index of ATI summaries for two years following the retention recommendations provided by Library and Archives Canada's *Generic Valuation Tool*, which is not an ATI specific policy or directive.
  - According to Library and Archives Canada, "retention periods are suggestions only; departments must take into account their own legislative requirements and business needs."

#### Ideas to Explore

- ATI summaries could be kept for longer than two years [redacted] which could facilitate access to information in an efficient way.

Commented [SJ1]: [redacted]

- [redacted]

- Should policies be developed [redacted]

- [redacted]

- [redacted]

Commented [SJ2]: [redacted]