



# Report on the Administration of the *Privacy Act*

2012-2013

Canada 

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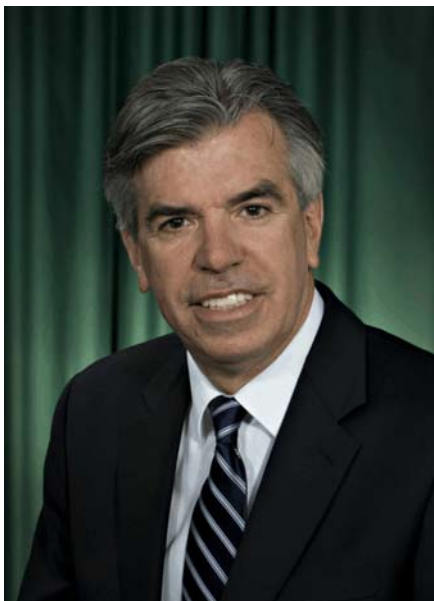
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## Message from the Chairperson



On behalf of the Veterans Review and Appeal Board, I am pleased to present the 2012-2013 annual report to Parliament on the administration of the *Privacy Act*.

This legislation gives Canadian citizens the right to see and correct personal information held by the Government of Canada. It also protects the individual's right to privacy by strictly controlling how the government uses this information. In 2012-13, the Board received and processed an increased number of formal requests under the *Privacy Act* for individuals exercising their rights under this legislation.

Privacy and the protection of our applicants' personal information remain top priorities at the Board. In 2012-13, the Board's Access to Information and Privacy (ATIP) Office continued to review our work processes through a "privacy" lens. During the last year, the Board carefully considered the audit findings from the Office of the

Privacy Commissioner of Veterans Affairs Canada's privacy practices to identify opportunities to strengthen our own practices. As a result, we finalized a training plan and implemented regular awareness activities to educate staff and members about our privacy obligations.

We asked to be included, and will be participating, in an audit of the protection of personal information by the Office of the Comptroller General for small agencies in 2013-14. The Board also committed to reviewing its privacy practices for further improvements to address recommendations from the House of Commons Standing Committee on Veterans Affairs.

In 2012-2013, the Board continued to provide applicants with an independent avenue of redress for their disability pension, disability award and War Veterans Allowance decisions. In fulfilling this mandate, we are committed to protecting individual rights by upholding the legislation and developing our capacity in matters of access to information and privacy.

A handwritten signature in black ink, reading "John D. Larlee". The signature is fluid and cursive.

John D. Larlee  
Chairperson

## The Veterans Review and Appeal Board

### *Our Objective*

The Veterans Review and Appeal Board is an independent, quasi-judicial tribunal created in 1995. The Board provides an appeal program for service-related disability decisions made by Veterans Affairs Canada (VAC, the Department). This program gives applicants two levels of redress for disability pension and disability award decisions and the final level of appeal for War Veterans Allowance claims.

The Board's objective is to ensure that Canada's traditional Veterans, Canadian Forces members and Veterans, Royal Canadian Mounted Police applicants, qualified civilians and their families receive the disability pensions, disability awards and other benefits to which they are entitled under the law.

### *How We Work*

The Board operates at arm's-length from the Department to ensure a fair appeal process for applicants. Our work is governed by the *Veterans Review and Appeal Board Act* and delivered by up to 29 permanent Members appointed by the Governor in Council and approximately 85 staff in 2012-2013. Our daily work involves conducting hearings in locations across Canada and issuing written decisions for applicants based on evidence and according to the legislation governing disability benefits.

### *Our Hearing Program*

The Board provides applicants with two levels of redress: a review hearing and a subsequent appeal hearing if they remain dissatisfied. Our hearings are non-adversarial, which means no one argues against the Veteran. Applicants have access to free case preparation and representation at their hearing by the Bureau of Pensions Advocates (a unique organization of lawyers within VAC) or by Service Officers from Veterans organizations. As independent adjudicators, Board Members are not bound by previous decisions and will change them to benefit applicants if there is credible evidence.

The review hearing is the first and only opportunity in the disability adjudication process for applicants to appear before the decision makers and tell their story. We hold review hearings in locations across Canada, and by video conference, where applicants give oral testimony, bring forward witnesses and new information, and present arguments in support of their case. If applicants are not satisfied with their review decision, they can request an appeal hearing. While the legislation does not permit oral testimony at the appeal level, the hearing is a further opportunity for applicants, through their representative, to submit new information and arguments. Appeal hearings are usually held at the Board's Head Office in Charlottetown, Prince Edward Island.

### *Our Commitment*

The Board is committed to upholding the principles of the *Privacy Act* while providing applicants with a fair and timely appeal process for disability benefits decisions.

## 1. Introduction

The *Privacy Act* protects the privacy of individuals with respect to personal information held by a government institution and provides individuals with a right of access to that information. This Act also protects against unauthorized disclosure of that personal information. In addition, it strictly controls how the government will collect, use, disclose, and dispose of any personal information.

Section 72 of the *Privacy Act* requires that the head of every government institution prepare an Annual Report, for submission to Parliament, on the administration of the Act within the institution during each fiscal year.

### **Mandate**

The Veterans Review and Appeal Board has full and exclusive jurisdiction to hear, determine and deal with all applications for review and appeal that may be made to the Board under the *Pension Act*, the *Canadian Forces Members and Veterans Re-establishment and Compensation Act - Part 3*, the *War Veterans Allowance Act* and other Acts of Parliament. All matters related to appeals under this legislation are authorized under the *Veterans Review and Appeal Board Act*.

This Board also adjudicates duty related pension applications under the authority of the *Royal Canadian Mounted Police Pension Continuation Act* and the *Royal Canadian Mounted Police Superannuation Act*.

## **2. How VRAB fulfills its responsibilities under the *Privacy Act***

The Access to Information and Privacy (ATIP) Office is under the Director, Corporate Operations who acts on behalf of the Chairperson of the Board to oversee the administration of the *Privacy Act*.

The ATIP Office is now entering its fourth year of existence. The office consists of an ATIP Coordinator, a Deputy Coordinator, a Project (Privacy) Officer and an ATIP Officer whose position was staffed permanently in July of 2012.

The Board has full responsibility for the administration of the *Privacy Act*. However, the decisions rendered by the Board may direct the Department to pay benefits to applicants and appellants. For this reason, these decision documents are kept on the Department's Head Office files. When privacy requests are made by Veterans to VAC for full disclosure of their files, these decisions are released through the VAC ATIP Office. All other requests, including access requests, are released through VRAB.

Duties of the ATIP Coordinator's Office include:

- Process requests for information submitted under the *Privacy Act* in accordance with the legislation, regulations and Treasury Board of Canada Secretariat (TBS) policies and guidelines;
- Provide VRAB managers and staff with advice and guidance regarding the interpretation and application of the *Privacy Act*, and related TBS policies and guidelines;
- Develop policies, procedures and guidelines for the administration of the Act and related TBS policies and guidelines;
- Complete Privacy Impact Assessments (PIAs) as required;
- Coordinate the resolution of any complaints against VRAB made to the Privacy Commissioner under the *Privacy Act*;
- Promote awareness to ensure employees understand their roles and responsibilities and the Board fulfills its obligations under the Act ;
- Review noteworthy decision documents from a privacy perspective before posting on VRAB's Web site;
- Manage privacy breaches and inform the Office of the Privacy Commissioner, as required.
- Respond to Parliamentary written questions on privacy.
- Prepare the VRAB chapter in the Info Source publication; and annual reports to TBS and Parliament on the administration of the *Privacy Act*.

## **3. Designation and Delegation Order**

### **(a) Chairperson's Delegation Order, 14 October 2009**

The responsibilities associated with the administration of the *Privacy Act*, such as notifying applicants of extensions and releasing records to applicants, are designated to the appropriate VRAB officials through a delegation instrument signed by the Chairperson, Veterans Review and Appeal Board.

***PRIVACY ACT DELEGATION ORDER***

The Chairperson of the Veterans Review and Appeal Board, pursuant to section 73 of the *Privacy Act*\*, hereby designates the persons holding the positions in the Veterans Review and Appeal Board set out in the schedule attached hereto, to exercise the powers and perform the duties and functions of the Chairperson as the head of a government institution under the sections of the Act set out in the schedule opposite the positions.

Dated at Charlottetown, this *14* day of *October*, 2009.

  
Chairperson, Veterans Review and Appeal Board

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\*R.S.C., 1985, c. P-21

**(b) Privacy Act Delegation Schedule, 14 October 2009**

HEAD OF INSTITUTION		CHAIRPERSON, VETERANS REVIEW & APPEAL BOARD
Sections of <i>Privacy Act</i>	Powers, Duties or Functions	Institution and Titles
73	All powers, duties or functions of head of the institution	Chairperson
8(2)(m)	Disclose personal information without the consent of the person concerned, in the public interest or to benefit the individual	Chairperson
20;21	Approve exemptions	Director General
8(2)(a)(b)(c)(d)(e)(f)(g)(h)(i)(j)(k)(l)	Disclose personal information without the consent of the person concerned: for a consistent use; in accordance with other Acts of Parliament; to comply with subpoenas; to the Attorney General for legal proceedings; to Federal Investigative Bodies; under agreement/arrangement with other governments; to members of Parliament helping individuals resolve a problem; to internal auditors or the Comptroller General; to the Public Archives; to researchers; to aboriginal peoples to settle land claims issues; and for purposes of locating an individual.	ATIP Coord./Deputy Coord.
8(5)	Notice of disclosure under 8(2)(m)	ATIP Coord./Deputy Coord.
8(4);9(1)	Retain copies and records	ATIP Coord./Deputy Coord.
9(4);10	Notify Privacy Commissioner of consistent use and amend index of personal information banks	ATIP Coord./Deputy Coord.
14(a)	Give notices re: access to records within 30 days	ATIP Coord./Deputy Coord.
15	Approve extension of time limits	ATIP Coord./Deputy Coord.
17(2)	Language of access	ATIP Coord./Deputy Coord.
19;22;23;24;25;26;27;28	Apply personal information exemptions	ATIP Coord./Deputy Coord.
31;33(2);35(1)(4);36(3);37(3);51(2)(b)(3)	Receive and give notices during an investigation	ATIP Coord./Deputy Coord.
72(1)	Prepare annual report to Parliament	ATIP Coord./Deputy Coord.



## **4. Statistical Report - Interpretation and Explanation**

The Statistical Report, included in Annex 1, provides a summary of the formal *Privacy Act* requests processed between the reporting period of April 1, 2012, and March 31, 2013.

### **PART 1 Requests under the *Privacy Act***

During the reporting period, VRAB received twenty-four (24) requests under the *Privacy Act*. One (1) request was outstanding from the previous reporting period for a total of twenty-five (25) requests.

### **PART 2 Requests closed during the reporting period**

#### **2.1 Disposition and completion time**

During the reporting period, VRAB completed twenty-two (22) requests under the *Privacy Act*. There were nine (9) cases where the information was all disclosed, twelve (12) where it was partly disclosed and one (1) request was abandoned.

Of the twenty-two (22) requests completed by VRAB, six (6) requests were completed within 15 days, ten (10) within 30 days, four (4) within 60 days, one (1) within 120 days; and one (1) within 180 days.

#### **2.2 Exemptions**

During the reporting period, VRAB invoked subsection 22(1)(b) once (1), section 26 twelve (12) times, and section 27 four (4) times under the *Privacy Act*.

#### **2.3 Exclusions**

There are no exclusions cited to report during the 2012-2013 reporting period.

#### **2.4 Format of information released**

In the twenty-two (22) requests completed, twelve (12) cases were released in whole or in part on paper, four (4) were released electronically on CD and five (5) were released under other formats.

#### **2.5 Complexity**

##### **2.5.1 Relevant pages processed and disclosed**

There were 584 pages processed and all disclosed and 5138 pages processed with 4696 disclosed in part.

## **2.5.2 Relevant pages processed and disclosed by size of requests**

Ten (10) of the requests processed and released were less than 100 pages, six (6) were between 101 and 500 pages, and six (6) were between 501 and 1000 pages.

## **2.5.3 Other complexities**

Four (4) cases where the information was disclosed in part required legal advice.

## **2.6 Deemed refusals**

### **2.6.1 Reasons for not meeting statutory deadline**

Five (5) cases were closed beyond the statutory deadline primarily due to heavy workload in two (2) cases, internal consultations in two (2) cases, and administrative error in one (1) case.

### **2.6.2 Number of days past deadline**

There were three (3) cases past the deadline where no extension was taken. One (1) was ten (10) days past the deadline, another three (3) days and the third was one (1) day. There were two (2) cases that were past the deadline where an extension was taken. One (1) was 12 days and the other 73 days.

## **2.7 Requests for translation**

During the reporting period, VRAB made zero requests for translations.

## **PART 3 Disclosures under subsection 8(2)**

During the reporting period, VRAB made no releases under subsection 8(2).

## **PART 4 Requests for correction of personal information and notations**

During the reporting period, there were no requests for corrections and/or notations received.

## **PART 5 Extensions**

During the reporting period, VRAB made three (3) requests for extensions.

## **5.1 Reasons for extensions and disposition of requests**

All three (3) cases where extensions were taken were under section 15(a)(i) of the *Privacy Act* and were disclosed in part.

## **5.2 Length of extensions**

All three (3) cases were extended for 30 days.

## **PART 6 Consultations received from institutions and organizations**

### **6.1 Consultations received from other government institutions and organizations**

During the reporting period, VRAB received three (3) consultations all from other government institutions.

### **6.2 Recommendations and completion time for consultations received from other government institutions**

One (1) consultation was disclosed entirely within 1-15 days. Two (2) consultations were disclosed in part, one (1) within 1-15 days and one (1) within 15-30 days.

### **6.3 Recommendations and completion time for consultations received from other organizations**

VRAB did not receive any consultations from other organizations.

## **PART 7 Completion time of consultations on Cabinet confidences**

VRAB did not have any consultations on Cabinet confidences.

## **PART 8 Resources related to the *Privacy Act***

### **8.1 Costs**

During the reporting period, VRAB spent a total of \$224,520.00 administering the *Privacy Act*. Staff salaries accounted for \$201,827.00, and other administrative costs (representing goods and services expenditures, including a contracted consultant) amounted to \$22,693.00.

## 8.2 Human Resources

Four (4) full time employees, one (1) dedicated full-time and three (3) dedicated part-time. Also one (1) casual and one (1) consultant were dedicated to privacy activities on a part-time basis.

## 5. Training

During the reporting period, ATIP training sessions were developed for both staff and Board Members. These sessions began at the end of the fiscal year 2012-2013 with six (6) staff receiving training. The remainder of the staff will be done within the first few months of the new fiscal year and will be reported in next year's Annual Report. The ATIP Office also gave one (1) awareness session to four (4) new Board Members. Thirty-six (36) staff participated in security briefing sessions that included an overview of access to information and privacy legislation.

## 6. Policies, Guidelines and Procedures

The following memoranda are revised and distributed annually to remind all VRAB employees of best practices when handling personal information:

- Privacy and Protection of Client Information
- Clean Desk Policy
- Need to Know Principle
- Safe Disposal of Protected and Classified Information.

These memos and posters ensure continual awareness of employees' roles and responsibilities when handling personal information and include procedures on the protection and disposal of personal information.

- Privacy breach procedures were revised in accordance with TBS guidelines and reflect that the ATIP Coordinator's office is now responsible for handling all privacy breaches within the Board.
- The TBS Standard on Privacy and Web analytics was reviewed to ensure VRAB is compliant and does not use web analytics externally on servers hosted by third parties.
- The Board has revised its Telework policy with increased emphasis on the information management and privacy requirements to be met by employees who enter into these working arrangements.

- The Board has also developed new procedures for contracts for independent medical opinions to limit the handling of medical information. These new procedures will further strengthen the handling and protection of personal information.
- Staff access to the VAC client tracking software is based on job titles and functions and reviewed when duties and roles are modified or changed.
- The Board introduced a new policy and undertaking respecting the return of VRAB information upon employees' departure. This policy provides guidance on the process for VRAB information that is to be returned to the Board for proper retention and disposal upon departure in accordance with the *Privacy Act*.

## **7. Complaints and/or Investigations**

There were no complaints and/or investigations made in 2012-2013.

## **8. Privacy Impact Assessment (PIA)**

During the reporting period, VRAB completed one (1) Privacy Impact Assessment on the publication of depersonalized decisions on the VRAB website.

## **9. Disclosures Pursuant to Paragraph 8(2)(m)**

There were no disclosures made of personal information pursuant to Paragraph 8(2)(m) of the *Privacy Act* during the 2012-2013 reporting period. Paragraph 8(2)(m) provides for disclosure for any purpose where, in the opinion of the head of the institution,

- (i) the public interest in disclosure clearly outweighs any invasion of privacy that could result from the disclosure, or
- (ii) disclosure would clearly benefit the individual to whom the information relates.

# Annex 1



Government of Canada  
Gouvernement du Canada

## Statistical Report on the *Privacy Act*

Name of institution: Veterans Review and Appeal Board

Reporting period: 2012/04/01 to 2013/03/31

### PART 1 – Requests under the *Privacy Act*

	Number of Requests
Received during reporting period	24
Outstanding from previous reporting period	1
<b>Total</b>	<b>25</b>
Closed during reporting period	22
Carried over to next reporting period	3

### PART 2 – Requests closed during the reporting period

#### 2.1 Disposition and completion time

Disposition of requests	Completion Time							Total
	1 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	
All disclosed	5	3	1	0	0	0	0	9
Disclosed in part	1	6	3	1	1	0	0	12
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	1	0	0	0	0	0	1
<b>Total</b>	<b>6</b>	<b>10</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>22</b>

#### 2.2 Exemptions

Section	Number of requests	Section	Number of requests	Section	Number of requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	1	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	12
19(1)(f)	0	22.1	0	27	4
20	0	22.2	0	28	0
21	0	22.3	0		

### 2.3 Exclusions

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

### 2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	3	1	5
Disclosed in part	9	3	0
Total	12	4	5

### 2.5 Complexity

#### 2.5.1 Relevant pages processed and disclosed

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	584	584	9
Disclosed in part	5138	4696	12
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	1

#### 2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less than 100 pages processed		101-500 pages processed		501-1000 pages processed		1001-5000 pages processed		More than 5000 pages processed	
	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed
All disclosed	7	160	2	424	0	0	0	0	0	0
Disclosed in part	2	124	4	913	6	3659	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
Abandoned	1	0	0	0	0	0	0	0	0	0
Total	10	284	6	1337	6	3659	0	0	0	0

### 2.5.3 Other complexities

Disposition	Consultation required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	4	0	0	4
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Abandoned	0	0	0	0	0
<b>Total</b>	0	4	0	0	4

### 2.6 Deemed refusals

#### 2.6.1 Reasons for not meeting statutory deadline

Number of requests closed past the statutory deadline	Principal Reason			
	Workload	External consultation	Internal consultation	Other
5	2	0	2	1

#### 2.6.2 Number of days past deadline

Number of days past deadline	Number of requests past deadline where no extension was taken	Number of requests past deadline where an extension was taken	Total
1 to 15 days	3	1	4
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	1	1
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
<b>Total</b>	3	2	5

### 2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
<b>Total</b>	0	0	0

### PART 3 – Disclosures under subsection 8(2)

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



**PART 4 – Requests for correction of personal information and notations**

	Number
Requests for correction received	0
Requests for correction accepted	0
Requests for correction refused	0
Notations attached	0

**PART 5 – Extensions**

## 5.1 Reasons for extensions and disposition of requests

Disposition of requests where an extension was taken	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation or conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	3	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
<b>Total</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 5.2 Length of extensions

Length of extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	3	0	0	0
<b>Total</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>

**PART 6 – Consultations received from other institutions and organizations**

**6.1 Consultations received from other government institutions and organizations**

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during the reporting period	3	138	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	<b>3</b>	<b>138</b>	<b>0</b>	<b>0</b>
Closed during the reporting period	3	138	0	0
Pending at the end of the reporting period	0	0	0	0

**6.2 Recommendations and completion time for consultations received from other government institutions**

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	
Disclose entirely	1	0	0	0	0	0	0	1
Disclose in part	1	1	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
<b>Total</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>

**6.3 Recommendations and completion time for consultations received from other organizations**

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	
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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**PART 7 – Completion time of consultations on Cabinet confidences**

Number of days	Number of responses received	Number of responses received past deadline
1 to 15	0	0
16 to 30	0	0
31 to 60	0	0
61 to 120	0	0
121 to 180	0	0
181 to 365	0	0
More than 365	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**PART 8 – Resources related to the Privacy Act**

**8.1 Costs**

Expenditures		Amount
Salaries		\$201,827
Overtime		\$0
Goods and Services		\$22,693
• Contracts for privacy impact assessments	\$0	
• Professional services contracts	\$15,019	
• Other	\$7,674	
<b>Total</b>		<b>\$224,520</b>

**8.2 Human Resources**

Resources	Dedicated full-time	Dedicated part-time	Total
Full-time employees	1.00	3.00	4.00
Part-time and casual employees	0.00	1.00	1.00
Regional staff	0.00	0.00	0.00
Consultants and agency personnel	0.00	1.00	1.00
Students	0.00	0.00	0.00
<b>Total</b>	<b>1.00</b>	<b>5.00</b>	<b>6.00</b>

**Completed Privacy Impact Assessments (PIAs)**

Institution	Number of Completed PIAs
Veterans Review and Appeal Board	1

This publication can be made available upon request. For further information or to obtain additional copies please contact:

VRAB ATIP Coordinator's Office  
PO Box 9900  
Charlottetown, Prince Edward Island  
C1A 8V7

[VRAB-ATIP\\_TACRA-AIPRP@VRAB-TACRA.GC.CA](mailto:VRAB-ATIP_TACRA-AIPRP@VRAB-TACRA.GC.CA)

Visit our Web site at: [www.vrab-tacra.gc.ca](http://www.vrab-tacra.gc.ca)

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