

**ACTION PLAN IMPLEMENTATION STATUS UPDATE
REPORT TO THE AUDIT COMMITTEE
AS OF SEPTEMBER 30, 2014**

Corporate Secretariat			
<i>Audit of Access to Information and Privacy (ATIP) Management</i>			
APPROVAL DATE: 27/06/14			
PROJECT RECOMMENDATIONS	ACTION PLAN	EXPECTED COMPLETION DATE	PROGRAM RESPONSE
	<p><i>Administration of the Access to Information Act.</i></p> <ul style="list-style-type: none"> • August 2014: Update the <i>ATIP Operations manual</i> to reflect any gaps identified in the report of the Audit of ATIP management 		<p>2. The Corporate Secretariat updated the ATIP Operations Manual to maintain consistency with the Treasury Board Secretariat Directive on the Access to Information Act. The following updates were made to the <i>ATIP Operations Manual</i>:</p> <ul style="list-style-type: none"> • Time extensions - Added information on notifying OIC when extensions are over 30 days. • Obstructing the Act - Added information on section 67.1 of the Act, including internal policy on dealing with potential cases of obstruction • Added information on John Doe v. Ontario (Finance), 2014 SCC 36 case (Section 21 of the ATIA) <p>AES: Implementation complete. Recommendation to close. Closed.</p>
<p>2. The Corporate Secretary should review, and update as applicable, the training programs offered by the ATIP Directorate. This would include:</p> <p>- Enhancing the Sectors' and Regions'</p>	<p>The Corporate Secretariat will review and update as applicable the training programs offered by the ATIP Directorate on an annual basis. In particular, the Corporate Secretariat will take the following actions:</p> <p>a. Convene a series of conference</p>	<p>July 2014</p>	<p>Status: <i>Request to Close (Complete)</i></p> <p>Update/Rationale: As of 04/11/2014:</p>

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<p>access to hands-on training and guidance. In developing these enhancements, it is recommended that regional/sectoral representatives are solicited for their input.</p> <p>-Conducting an assessment regarding the sufficiency of the privacy training program relative to the Directorate's responsibility to educate and promoting awareness of privacy and privacy-related issues throughout the Department</p>	<p>calls/meetings with regional/sectoral representatives for input and feedback on the specific improvements or needs for an ATIP training program; and</p> <p>b. Assess the sufficiency of the ATIP training program, and add further content and substance to the ATIP training program, which focus on promoting awareness of privacy and privacy-related issues throughout the Department.</p> <ul style="list-style-type: none"> • September 2014 - Provide a new ATIP training program, which includes privacy-related issues, as well as the process by which Privacy Impact Assessments (PIAs) are prepared and approved within AANDC. 	<p>September 2014</p>	<p>a. Input solicited from ATIP Liaison Officers for ALO regional/sectoral operations manual and for training needs during ALO calls July 25, 2014 to August 21, 2014</p> <p>b. PIA guidelines were updated in August 2014 and a section was added to the Privacy Policy Awareness training deck.</p> <p>A Privacy Policy Awareness Training session was added to the list of "recommended" training in the Learning and Development Directorate's learning calendar</p> <p>AES: Implementation complete. Recommend to close. Closed.</p>
<p>3. The Corporate Secretary should clarify expectations, roles and responsibilities for driving efficiencies within ATIP Management, and establish related objectives and practices designed to improve process efficiency. Practices could include facilitating the sharing of best practices between</p>	<p>1. The Corporate Secretariat will develop a comprehensive regional/sectoral operations manual that will ensure uniform best practices for the processing and retrieval of ATIP records across the Department for ATIP Liaison Officers in the sectors and regions.</p> <p>2. The Corporate Secretariat will add further</p>	<p>October 2014</p>	<p>Status: <i>Underway</i></p> <p>Update/Rationale: As of 04/11/2014:</p> <p>1.</p> <ul style="list-style-type: none"> • ATIP Liaison Officer (ALO) meetings to discuss the development of an ALO regional/sectoral manual officially

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			the time submitted by programs and sectors on impact statements (process already in place). An excel sheet will be compiled for total time of all requests each month. AES: Implementation on-going.