

Access to Information 2022-23

April 2022-March 2023



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1. Introduction

The Access to Information Act (the Act) gives Canadian citizens, as well as Corporations in Canada, the right to request access to records held by federal institutions including Crown corporations subject to the Act.

Canada Post Corporation (Canada Post or the Corporation) is pleased to submit to Parliament its Annual Report related to the administration of the Act, prepared in accordance with section 94 of the Act. Canada Post's financial year aligns with the calendar year and reporting is done annually. As required by the Treasury Board of Canada Secretariat, this report covers the period from April 1, 2022, to March 31, 2023.

1.1 Canada Post mandate

The Canada Post Group of Companies consists of the Canada Post segment and subsidiaries Purolator Holdings Ltd., SCI Group Inc. and Innovapost Inc. The Group of Companies employed more than 83,600 people (paid full-time and part-time employees, including temporary, casual and term employees) in 2022, including nearly 68,000 in the Canada Post segment. The Group of Companies delivered over 6.7 billion pieces of mail, parcels, and messages in 2022 to over 17 million addresses across Canada. The Canada Post segment operates the largest retail network in Canada with close to 5,900 post offices across the country. It has a mandate to securely serve every Canadian address while maintaining financial self-sustainability.

In 2022, digital solutions continued to disrupt our Transaction Mail and Direct Marketing businesses. Lettermail[™] volumes have declined significantly and steadily for more than 15 years. Canada Post delivered 64% fewer pieces of mail per address in 2022 than in the peak year of 2006.

The parcel delivery gig economy has transformed over the past few years, resulting in increased competition on a global scale. The ecommerce market is expected to more than double in size over the next decade, while ecommerce merchants and consumers increasingly have higher expectations for speed, price and service. The needs of Canadians are changing significantly, and we are changing with them. Canadians expect Canada Post to be a social and environmental leader, to continue investing in innovative products and services that support small businesses relying heavily on Canada Post and to create a safe and healthy workplace for our employees. A transformation plan, A Stronger Canada – Delivered, is our commitment to Canadians. By putting Canadians first, by building capacity and improving service, we're establishing the path to financial self-sustainability.

[™] Trademark of Canada Post Corporation.

Canada Post's revenue is generated in a highly competitive market; its Parcels line of business earned 50% (nearly \$3.6 billion) of Canada Post revenue in 2022, compared to 22% in 2012. With a mandate to fund operations with revenue from the sale of products and services, rather than with taxpayer funding, and conduct operations on a financially self-sustaining basis, it is critical that we protect commercially sensitive information. While most government documents are non-commercial by definition, the opposite is true at Canada Post.

1.2 Canada Post and the Access to Information Act

Canada Post has been subject to the Act since September 1, 2007. The Corporation is strongly committed to meeting its statutory obligations. It is of paramount importance that the requesters' right of access is respected and balanced with the protection of commercially sensitive, confidential and third-party information.

Considering that approximately 50% of Canada Post's revenue is earned in the highly competitive ecommerce and parcel markets, it is even more critical that certain information not be disclosed due to its commercial sensitivity and the potential prejudice to Canada Post's position in this marketplace. To reflect this operating reality, section 18.1(1)(a) was added to the Act in 2007, for Canada Post's exclusive use and to acknowledge the unique commercial context in which it operates.

Canada Post embraces the principle of transparency as a Crown corporation that serves Canadians. It is committed to its corporate environmental, social and governance (ESG) strategy that situates transparency as an important foundational value and objective. This commitment is demonstrated in several ways, including the publication of a comprehensive annual report about its business and financial performance, a corporate plan summary, the *Canada Postal Guide*, the *Sustainability Report* and through regular disclosures on **canadapost.ca**. In the context of access to information, transparency informs the approach to requests for information made under the Act.

2. Organizational Structure

The Access to Information and Privacy (ATI and Privacy) Directorate is part of the Corporate Compliance and Regulatory Affairs team (CCRA) within the Environment, Social and Governance (ESG) portfolio.

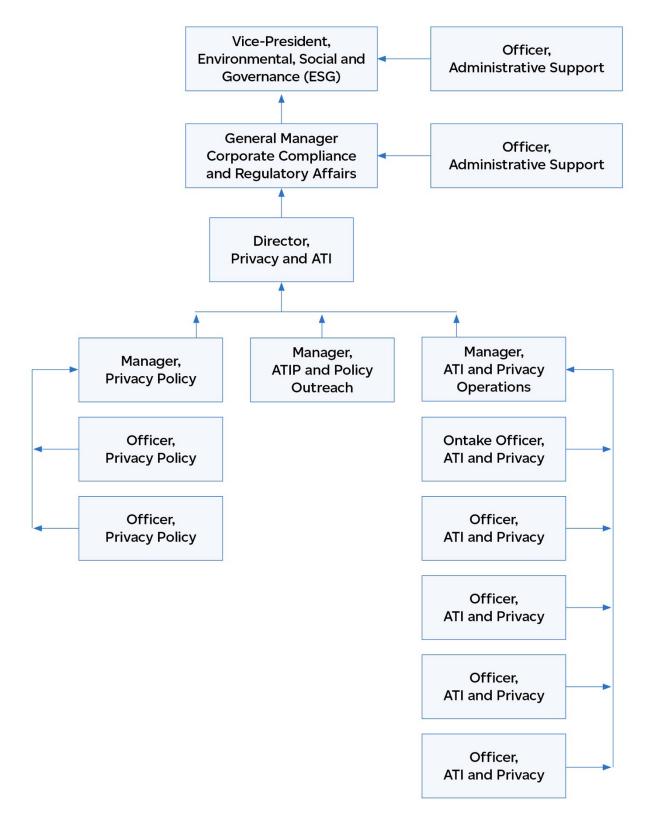
The ATI and Privacy Directorate is responsible for the administration of the Act, the operational accountability for the program, the administration and processing of access requests received by Canada Post under both the *Access to Information Act* and the *Privacy Act* and the response to complaints from the Office of the Information Commissioner of Canada (OPC) and the Office of the Information Commissioner of Canada (OIC).

During the 2022-23 reporting period, the ATI and Privacy team included four ATI and privacy officers, an intake officer and one contractor, who process requests under the *Access to Information Act* and the *Privacy Act* as well as respond to complaints from the OPC and the OIC. They report to the Manager of ATI and Privacy Operations. Exceptionally, during most of the reporting period, the Manager of ATI and Privacy, Policy and Outreach also acted as the Manager of ATI and Privacy Operations. The Privacy Office included two privacy officers reporting to the Manager of Privacy Policy. The three managers report to the Director of ATI and Privacy, who, in turn, reports to the General Manager of Corporate Compliance and Regulatory Affairs. The Director acts as the ATI and Privacy Coordinator and point of contact for the Corporation in liaising with the Treasury Board of Canada Secretariat, the OIC, the OPC and other government institutions for access to information matters.

In 2022-23, Canada Post was not party to any service agreements under section 96 of the *Access to Information Act*.

The chart below outlines our organizational structure as of March 31, 2023.

Corporate Compliance and Regulatory Affairs organizational chart



2.1 Governance

The ATI and Privacy Directorate has the commitment and support of senior management and the Board of Directors to ensure that the Corporation meets its obligations under the Act.

The ATI Advisory Committee, composed of Canada Post executives from key lines of business, has a mandate to support the ATI and Privacy Directorate from a corporate perspective. It was created in 2007 when Canada Post first became subject to the Act, and it meets monthly to advise and guide the ATI Directorate with respect to new requests received during the month. It also helps resolve and escalate issues related to the processing of active access to information requests.

In addition, offices of primary interest (OPIs) have been identified under general managers across the Corporation. A network of liaison officers (LOs) represent the OPIs to coordinate and liaise with the Access to Information Directorate in processing records for ATI requests.

3. Delegation Order

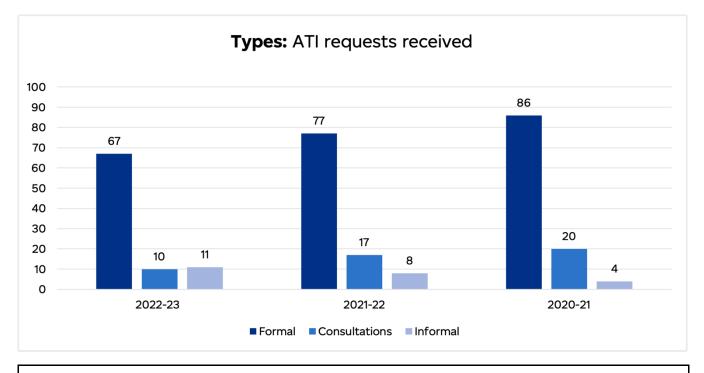
In May 2020, the delegation order was revised pursuant to section 95 of the Act. The President and CEO's authority is delegated to allow the ATI and Privacy Directorate to meet key legislative requirements, while enabling efficiencies and managing risk at the appropriate levels in the Corporation. As required by the Treasury Board of Canada Secretariat, a copy of the delegation order is included in Appendix A.

4. Performance of the Access to Information Program in 2022-23

For the second year in a row, the number of formal requests received under the Act has decreased, compared to the previous reporting period. The number of consultations and informal access to information requests has also slightly decreased but overall remains stable.

Although every ATI request is unique, the most common types of records and information requested this year were an anomaly, compared to previous years. Almost half of the requests received by the ATI and Privacy Directorate pertained to information about Canada Post employees or human resource matters. Overall, the following topics appeared to be of particular interest to Canadians:

- COVID-19, mandatory vaccine practice and vaccine accommodations
- Canada Post products and services (e.g., stamp issues, Canada Post Neighbourhood Mail[™], mail forwarding)
- Information and statistics pertaining to Canada Post employees
- Canada Post employees' salaries and compensation
- Illegal goods in the mail

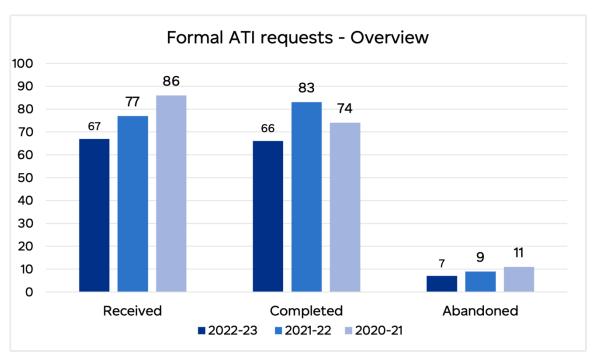


Formal ATI requests: Requesters can seek to obtain corporate records under the control of Canada Post.

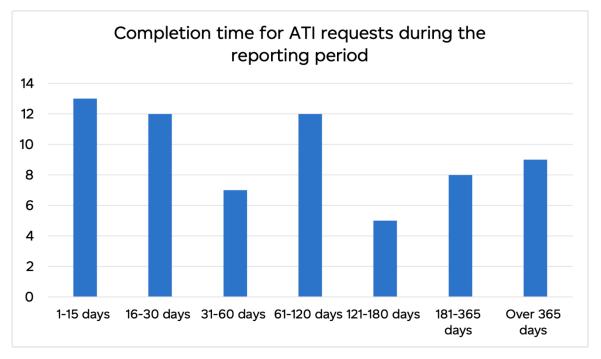
ATI consultations: Any record or set of records responding to a particular request that is transmitted from the ATI and Privacy Directorate of another government institution to Canada Post's ATI and Privacy Directorate for review by that ATI and Privacy Directorate and offices of primary interest within their respective institution. The consultations allow Canada Post to express any concerns with the disclosure of information contained in the set of records.

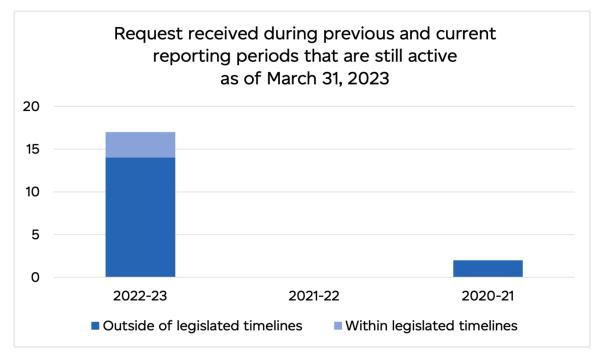
Informal ATI requests: Requesters can seek to obtain records that were released in a previous access to information request completed by the ATI and Privacy Directorate.

4.1 Volume of requests



In 2022-23, the ATI and Privacy Directorate almost closed as many requests as those received.

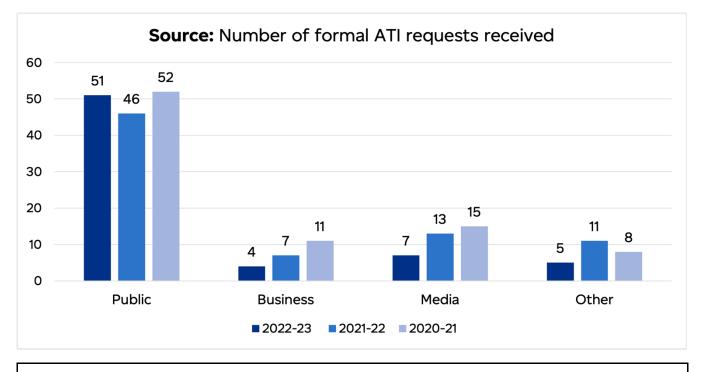




Among the 67 requests received this year, 77% were responded to within legislated timelines. This decrease in Canada Post's performance is the result of a number of factors including the complexity of the requests received. A vast number of requests pertained to records that were sensitive in nature and required the involvement of numerous offices of primary interest (OPI) since many different types of records were requested at once. In some instances, further delays were caused by difficulties in locating records, determining whether responsive records existed and obtaining the responsive records from OPIs.

4.2 Sources

The number of requests received from businesses, media and other sources has generally decreased by 50%, compared to last year. While the requests received from the public has slightly increased, half of these requests were submitted by Canada Post employees, which represents a significant increase compared to the previous reporting period.



Public: Includes any requester who has identified themselves as a Canada Post employee, customer or generally as a member of the public when submitting their request.

Business: Includes but is not limited to representatives of private sector companies or corporations, information brokers, lawyers, agents, consultants and paid lobbyists. This category also includes any requesters who have identified themselves as "Business" when submitting their request.

Media: Includes but is not limited to journalists, reporters (newspapers, television or other media sources) and researchers (newspapers, television or other media sources). This category also includes any requesters who have identified themselves as "Media" when submitting their request.

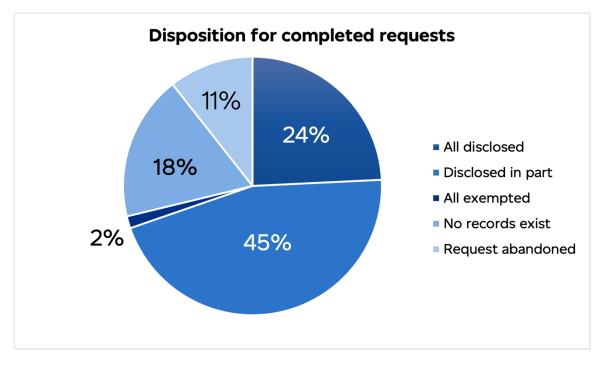
Other: Includes requests originating from academia and organizations (e.g. non-profit) when submitting their request.

4.3 Extensions

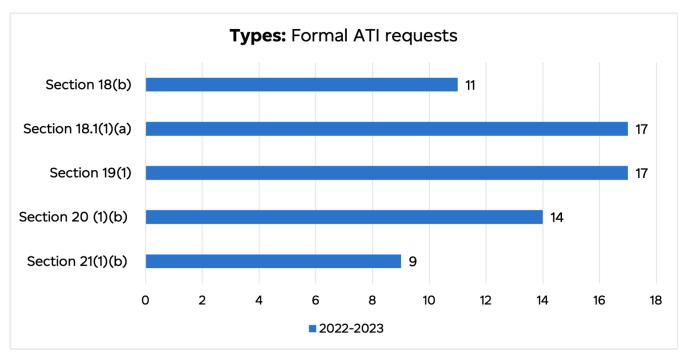
A total of 28 extensions were taken during the reporting period.

Most extensions were required under section 9(1)(a) of the Act due to the large number of records involved and the fact that meeting the original time limit would unreasonably interfere with operations. Eight extensions were taken under section 9(1)(b) for internal consultations or consultations with other government departments.

4.4 Exemptions



Approximately 50% of the completed requests in 2022-23 were partially disclosed. The exemptions in the Act applied most frequently continue to reflect the reality of Canada Post as a Crown corporation that is required to be financially self-sustaining while competing in the highly competitive ecommerce and parcel delivery environment.



Section 18(b) – Prejudice to the competitive position of a government institution or to interfere with contractual or other negotiations of a government institution.

Section 18.1(1)(a) – Canada Post's financial, commercial and/or technical information that has consistently been treated as confidential.

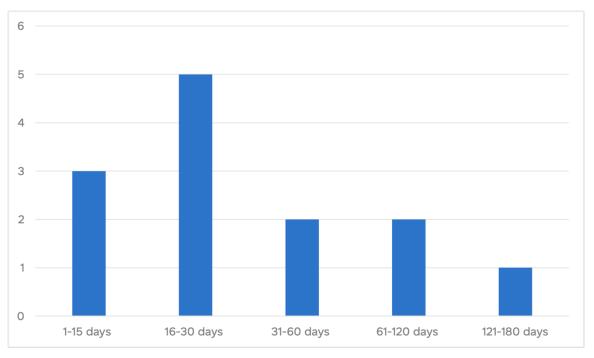
Section 19(1) – Personal information.

Section 20(1)(b) – Financial, commercial, scientific or technical information that is confidential information supplied to a government by a third party and is treated consistently in a confidential manner by the third party.

Section 21(1)(b) – Account of consultations or deliberations involving directors, officers or employees of a government institution.

4.5 Consultations

During the reporting period, the ATI and Privacy Directorate received a total of 13 consultations from other government institutions and departments. The chart below illustrates the number of days Canada Post was required to review the records and provide a response to the consultation.



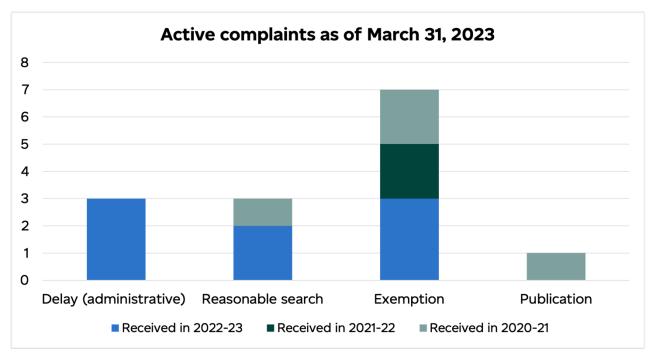
4.6 Complaints

Complaints give Canada Post the opportunity to liaise with the Office of the Information Commissioner (OIC) and have discussions about the Corporation's approach to disclosure and the interpretation of key sections of the Act – in particular, sections 18.1(1)(a), and 18(b),

which are critical provisions that protect the financial and business information of Canada Post in the fulfillment of its mandate.

Canada Post received 14 complaints in 2022-23, which is a slight increase, compared to last year. Over half of the complaints received this year (64%) were pertaining to delays in responding to a request within legislated time limits. Each of these requests involved records from multiple business areas, which caused challenges related to locating the records and obtaining relevant records from key stakeholders. In addition, these requests involved a significant number of pages to triage and review. Nevertheless, 50% of the requests received during the reporting period have also been closed at an early stage (without any initial or final reports issued by the OIC) within that same year.

The ATI and Privacy Directorate proactively engages the OIC and maintains an ongoing dialogue to foster the relationship and encourage a collaborative approach. There is a focus and intention on both sides to effectively resolve outstanding complaints as well as aim for an early resolution of the complaints, where possible.



4.7 COVID-19

The ATI and Privacy Directorate's operations were not affected by COVID-19 during the reporting period.

Although at the beginning of the reporting period, the ATI and Privacy Directorate was still working entirely remotely, this did not affect its ability to fulfill its responsibilities under the Act. During that time, arrangements were made to ensure that, at least once a week, any

request received by mail or fax was retrieved and responses to requests for which requesters required the records in paper format were mailed out.

5. Training and Awareness

This year, the training and awareness agenda for the ATI and Privacy Directorate team included the following activities:

- Case study sessions to review of specific case files and lessons learned.
- Workshops pertaining to specific sections and concepts in the Act, requests and complaints processing and communication with internal stakeholders.
- Review of recent ATI case law and guidance from the OIC and the Treasury Board of Canada Secretariat (TBS).

Quarterly meetings with the ATI and Privacy teams were also held. These meetings provide an opportunity for the entire team to discuss relevant case law, OIC, OPC and TBS amendments, policies and directives, case files and issues. These meetings contribute to ensure that the ATI and Privacy Directorate is aligned with the broader vision and strategies as well as with any new requirements or directions from the oversight bodies.

During 2022-23, new members joined the ATI and Privacy team. To ensure an optimal integration, one-on-one onboarding and training sessions as well as continuous coaching and task shadowing were provided by ATI and Privacy managers.

In addition, awareness and education about the Act and its requirements were provided throughout the year to OPIs, LOs and key stakeholders. The goal of these tailored awareness sessions is to provide an orientation to the Act and an understanding of the roles, responsibilities, and legislated requirements of both record holders and the ATI and Privacy Directorate.

The ATI and Privacy Directorate has also continued to collaborate with other areas of Corporate Compliance and Regulatory Affairs, including the Privacy Office and Information and Records Management to ensure that the training and awareness strategy is comprehensive. These joint efforts positively contribute to increase awareness of the importance of privacy as well as the need to manage records appropriately.

6. Policies, Guidelines and Procedures

Several internal guidelines and procedures were developed and implemented throughout the reporting period.

An "evergreen" manual for ATI and Privacy officers and managers was developed. This manual contains a detailed description of the roles and responsibilities of the officers and managers within the ATI and Privacy Directorate with related tools and guidance documents. For example:

- Detailed steps related to tasks that are required within their respective functions and timelines for processing ATI requests.
- A timeline detailing each action to be undertaken by the ATI and Privacy Directorate while processing an ATI request.
- Internal procedures for processing complaints.
- Guidance on specific issues (e.g., control of the record).

These guidelines are evergreen and, therefore, will be reviewed and revised as needed.

7. Proactive Publication Under Part 2 of the Act

Canada Post is a Crown corporation listed in Schedule III, Part I of the *Financial Administration Act.* As such, the applicable proactive disclosure legislative requirements pertain to the following:

- travel expenses;
- hospitality expenses;
- reports tabled in Parliament.

The travel and hospitality expenses of Canada Post's Board of Directors and senior management is published on Canada Post's website on a monthly basis online : <u>https://www.canadapost-postescanada.ca/cpc/en/our-company/about-us/our-leadership/travel-and-hospitality-policy/travel-and-hospitality-expenses.page?</u>

The reports tabled in Parliament are also available on Canada Post's Access to information and Privacy centre webpages:

- Accès à l'information
- Privacy Center

In 2022-23, the entirety of the information above was published within the legislated timelines and requirements. The publication of travel and hospitality expenses is the responsibility of the Corporate Travel team. As such, they prepare monthly disclosure reports, pertaining to travel and hospitality expenses. Each executive reviews these monthly reports. Once approved, they are provided to the Canada Post Web team to be published on the Canada Post website. The Corporate Travel team also prepares the annual travel aggregate report for publication on Canada Post's website.

As for annual reports tabled in Parliament, Corporate Compliance and Regulatory Affairs publishes them on the Canada Post website.

8. Initiatives and Projects to Improve Access to Information

As stated in s. 4.1.5 of the *Directive on Access to Information Requests*, the Act is "intended to complement existing procedures for obtaining government information and is not intended to limit the type of information that is otherwise available to the public." This has been the focus of a key process improvement for the ATI and Privacy Directorate.

The ATI and Privacy Directorate has identified certain types of frequently requested records and sought the collaboration of specific business areas (the record holders) to develop alternate processes by which Canadians could access the information quicker and without the need to go through the formal access to information process. As this is a multi-phased project, it will be continued through the next reporting period.

During the reporting period, the ATI and Privacy Directorate has started to receive ATI requests via the ATIP Online platform. Members of the ATI and Privacy team have received training on the use of this platform.

The ATI and Privacy Manager, Policy and Outreach also meets regularly with the Manager of Information Management, to discuss joint issues and develop new awareness materials for stakeholders to better understand roles and responsibilities and develop better information management habits that will ultimately facilitate their search and retrieval of records in response to an ATI request.

9. Summary of Key Issues and Actions Taken on Complaints

In 2022-23, Canada Post responded to complaints from the OIC related to the conduct of a reasonable search for records. For each complaint pertaining to an alleged incomplete search, Canada Post made every reasonable effort to further its search which, at times, led to the release of additional records.

However, the issues raised by the OIC investigative team contributed to the identification of at least one area of improvement which is the need to better document the search and retrieval of relevant records. To address this issue, an improved Response Form for OPIs was developed. This improved internal tool allows the ATI and Privacy Directorate to document the following:

- keywords used to conduct the search for records;
- search for responsive paper records;
- retention period of records for which a search has been conducted;

The Response Form will also address a concern raised by the OIC, which is that an absence of response from an OPI cannot be considered a "no records" response. The final version of this tool is to be launched early in the next reporting period.

Canada Post also received administrative complaints, as a direct result of certain requests not being responded to within the legislated time limits. Canada Post found that one of the common causes for these delays was related to communication challenges with certain business areas with respect to the ATI process and requirements. This specific issue has been addressed by communicating with the OPIs earlier in the process to proactively discuss any foreseeable concerns as well as to discuss the roles and responsibilities of both record holders and the ATI officers.

10. Monitoring Compliance

The ATI and Privacy Directorate continued to seek opportunities to strengthen accountability to meet the legislative requirements. Several measures continue to be in place to monitor and evaluate the processing of access to information requests.

Canada Post uses Amanda 7 software by Calytera (formerly CSDC Systems) to manage all requests received under the Act. The software has a functionality that allows the Manager of Access to Information and Privacy to monitor the status and time taken to process ATI requests.

On a weekly basis, the ATI and Privacy Managers meet with the ATI and Privacy Director to discuss the status updates and challenges of all active access to information requests as well as to strategize on approaches for specific requests. The frequency of these meetings has allowed the team to quickly work toward solutions and revise priorities to address any obstacles that would put files at risk of being late. On a monthly basis, the current ATI files are discussed with the ATI Advisory Committee, which is composed of members at a senior level in key business areas such as media relations, government affairs and legal affairs.

In addition, the ATI Directorate has continued to provide regular updates to the General Manager, Corporate Compliance and Regulatory Affairs. In addition, there are *ad hoc* briefings to the Vice-President, Environmental, Social and Governance (ESG) or the President and CEO, as well as briefings to senior executives and OPIs on key requests.

With respect to the inter-institutional consultations, a concerted effort has been made to exercise discretion to conduct consultations and only in instances where a full or partial release of the information contained in their records was considered. A reasonable timeline is provided to other institutions including status update inquiries. There is no formal monitoring of the frequency and the length of consultations with ATI and Privacy management.

During the reporting period, Canada Post developed a process to identify incoming requests that could potentially be addressed informally and set a collaborative approach with relevant key stakeholders and business areas within the Corporation.

With respect to the proactive publication of travel and hospitality expenses, the Corporate Travel team provides updates to the External Finance Reporting team as to when the monthly reports are published on Canada Post's website. This internal monitoring is part of the Finance team's quarterly compliance monitoring.

During the reporting period, Canada Post did not monitor the right of public access to information being reflected in contracts, information-sharing agreements and information-sharing arrangements in accordance with section 4.2.8 of the Directive Access to Information Requests.

11. Conclusion

During this reporting period, the ATI and Privacy Directorate continued to experience challenges in the hiring and retention of employees. This widespread shortage of a qualified labour force to fill vacancies within its ATI and Privacy team has continued to significantly impact the operations of the ATI and Privacy Directorate. The efforts of TBS to provide recruitment support across the ATIP community was welcomed. In addition, the move to a hybrid workforce at Canada Post has assisted in attracting and maintaining a qualified team.

The ATI and Privacy Directorate is committed to an approach to access to information that is aligned with the needs of Canadians for further accountability and transparency of information. However, it is also critical that the Corporation protects its proprietary and commercially sensitive information as well as the information of its partners, suppliers and customers under the Act. This accountability is fundamental to these relationships and the trust they have in the Corporation.

Appendix A – Delegation Order

Canada Post Corporation Delegation Order

The President and Chief Executive Officer of the Canada Post Corporation, Doug Ettinger, on this _32_day of Source 2021, pursuant to section 96(1) of the Access to Information Act, hereby designates the persons holding the positions set out in the schedule hereto to exercise the powers and perform the duties and functions of the President and Chief Executive Officer, the Head of the Institution, for the purposes of the Access to Information Act, as set out hereto in the schedule below.

Delegation of Powers, Duties or Functions Pursuant to Section 96(1) of the <u>Access to Information Act</u>

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
4(2.1)	Duty to Assist: Responsibility of government institutions	Х	Х	Х	Х		
7(a)	Notice when access requested within 30 days	Х	Х	Х	Х	Х	
7(b)	Giving access to record or part thereof	Х	Х	Х	Х		
8(1)	Transfer of request to another government institution	Х	x	Х	x		
9	Extension of time limits for responding to request and issue notice	х	x	Х	х		
11 (2)(3)(4)(5)(6)	Administration and Collection of fees	Х	Х	Х	Х	Х	
12(2)(b)	Language of access	Х	Х	Х	Х	Х	
12(3)(b)	Access in an alternative format	Х	Х	Х	Х	Х	

Exemption Provisions of the <u>Access to Information Act</u>

				Delegatio	on Order		
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
13	Exemption – Information obtained in confidence from other gov'ts/organizations	х	x	Х	×		
14	Exemption – Federal- provincial affairs	х	х	х	х		
15	Exemption – International affairs and defence	Х	х	Х	х		
16	Exemption – Law enforcement and investigations	Х	х	Х	Х		
16.5	Exemption – Public Servants Disclosure Protection Act	Х	х	х	х		
17	Exemption – Safety of Individuals	Х	Х	Х	Х		
18	Exemption – Economic interests of Canada	х	х	х			
18.1	Exemption – Economic interests of the Canada Post Corporation	Х	x	Х			
19	Exemption – Personal information	Х	Х	х	х		
20	Exemption – Third-party information	Х	х	Х	х		
21	Exemption – Operations of Government	Х	Х	Х	Х		
22	Exemption – Testing procedures, tests and audits	Х	х	Х	Х		
22.1	Exemption – Audit working papers and draft audit reports	Х	x	х	х		

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
23	Exemption – Solicitor-client privilege	Х	Х	Х	Х		
24	Exemption – Statutory prohibitions against disclosure	Х	х	Х	х		

Other Provisions of the Access to Information Act

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				Delegati	on Order		
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
25	Severability	Х	Х	Х	Х		
26	Exception – refusal of access where info to be published	Х	Х	Х	Х		
27(1),(4)	Third-party notification	Х	Х	Х	Х	Х	
28(1)(b) (2),(4)	Third-party representations and decision	Х	Х	Х	Х		
29(1)	Disclosure of record where the Information Commissioner recommends disclosure	х	X	х			
33	Shall advise Information Commissioner of third party that has been notified when refusing to disclose record	х	x	х	x		
35(2)(b)	Right to make representations in course of investigation	Х	x	х			
37(4)	Notice to Information Commissioner where access to record given previously withheld records	Х	x	Х			

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
43(1)	Provide notice to third party upon application to Federal Court for judicial review by third party or OIC	х	x	х	x		
44(2)	Provide notice to applicant upon application to Federal Court for judicial review by third party or OIC	х	x	х	x		
52(2)(b)(3)	Request special rules for hearings	Х	X	Х	Х		
71(1)	Provide facilities for inspection of manuals and exclude exempted information	х	x	х	x		
72	Prepare for submission of Annual Report to Parliament of the administration of this Act	х	x	х			

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Delegation of Powers, Duties or Functions Pursuant to the <u>Access to Information Regulations</u>

		Delegation Order						
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy	
6(1)	Transfer of request	Х	Х	Х	Х	Х		
7(2)	Search and preparation fees							
7(3)	Production and programming fees							
8	Providing access to record(s)	Х	Х	Х	Х	Х		
8.1	Limitations in respect to format	Х	Х	Х	Х	Х		

NB: The Director, Access to Information and Privacy, and the Managers of the Access to Information and Privacy programs are authorized to designate in writing a member of their staff to act on their behalf in case of absence or unavailability.

DATED, at the City of Ottawn, this _23___ day of Sept.___, 2023

__Doug Ettinger, President and CEO, Canada Post Corporation

Appendix B – Canada Post Corporation Wholly Owned Subsidiaries

1. Introduction

The information contained in this report relates to the administration of the Access to Information Act by the following wholly owned subsidiaries of the Corporation from April 1, 2022, to March 31, 2023.

2. Activities

2.1 2875039 Canada Limited

As a holding company, 2875039 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875039 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in Purolator Holdings Ltd.

2.2 2875047 Canada Limited

As a holding company, 2875047 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875047 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation. It is currently inactive.

2.3 3906949 Canada Inc.

As a holding company, 3906949 Canada Inc. does not employ staff, but elects a director who is also the president and secretary of the company.

3906949 Canada Inc. was incorporated on June 15, 2001, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in SCI Group Inc.

3. Delegation of Authority

There is no delegation of authority applicable to any wholly owned subsidiary of the Corporation.

4. Request Activity

Canada Post's wholly owned subsidiaries did not receive any *Access to Information Act* requests in 2021-22.

Appendix C – Treasury Board of Canada Secretariat Statistical Report



Government of Canada Gouvernement du Canada

Statistical Report on the Access to Information Act

Name of institution: Canada Post Corporation

Reporting period: <u>2022-04-01</u> to <u>2023-03-31</u>

Section 1: Requests Under the Access to Information Act

1.1 Number of requests

		Number of Requests
Received during reporting period	67	
Outstanding from previous reporting period	18	
 Outstanding from previous reporting period 	16	
Outstanding from more than one reporting period	2	
Total		85
Closed during reporting period		66
Carried over to next reporting period		19
Carried over within legislated timeline	5	
Carried over beyond legislated timeline	14	

1.2 Sources of requests

Source	Number of Requests
Media	7
Academia	1
Business (private sector)	4
Organization	4
Public	51
Decline to Identify	0
Total	67

1.3 Channels of requests

Source	Number of Requests
Online	40
E-mail	13
Mail	14
In person	0
Phone	0
Fax	0
Total	67



Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		11
Outstanding from previous reporting periods		3
 Outstanding from previous reporting period 	3	
 Outstanding from more than one reporting period 	0	
Total		14
Closed during reporting period		10
Carried over to next reporting period		4

2.2 Channels of informal requests

Source	Number of Requests
Online	1
E-mail	10
Mail	0
In person	0
Phone	0
Fax	0
Total	11

2.3 Completion time of informal requests

Completion Time

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	Total
3	0	0	1	2	4	0	10

2.4 Pages released informally

Less Than Relea	•	100-5 Pages Re		501-1000 Pages Released		1001-5 Pages Re			Than 5000 s Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	
0	0	1	322	0	0	0	0	0	0	

2.5 Pages re-released informally

Less Than Relea	•	100-5 Pages Re		501-1000 Pages Released		1001-5 Pages Re			
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
9	58	0	0	0	0	0	0	0	0

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

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

Section 4 : Requests Closed During the Reporting Period

4.1 Disposition and completion time

				Com	pletion Time	e		
Disposition of Requests	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	Total
All disclosed	3	1	2	7	2	1	0	16
Disclosed in part	3	5	3	4	1	5	9	30
All exempted	0	0	0	1	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	3	4	1	0	2	2	0	12
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	4	2	1	0	0	0	0	7
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0
Total	13	12	7	12	5	8	9	66

4.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	0	16(2)	2	18(a)	1	20.1	0
13(1)(b)	0	16(2)(a)	2	18(b)	11	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	1	18(d)	0	21(1)(a)	4
13(1)(e)	0	16(3)	0	18.1(1)(a)	17	21(1)(b)	9
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	0

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	0	21(1)(d)	2
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	0
15(1)	0	16.1(1)(d)	0	19(1)	17	22.1(1)	0
15(1) - I.A.*	0	16.2(1)	0	20(1)(a)	0	23	1
15(1) - Def.*	0	16.3	0	20(1)(b)	14	23.1	0
15(1) - S.A.*	0	16.4(1)(a)	0	20(1)(b.1)	0	24(1)	0
16(1)(a)(i)	0	16.4(1)(b)	0	20(1)(c)	2	26	0
16(1)(a)(ii)	0	16.5	0	20(1)(d)	2		
16(1)(a)(iii)	0	16.6	0		-		
16(1)(b)	0	17	2				
16(1)(c)	3			_			
16(1)(d)	0	* I.A.: In	ternational Affairs	Det.: Detence (or canada S.A.: S	oudversive Activ	VITIES

4.3 Exclusions

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

4.4 Format of information released

Paper	E-record	Data set	Video	Audio	Other
42	44	0	0	0	0

4.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
8265	4508	54

		han 100 rocessed		500 rocessed		1000 rocessed		5000 rocessed		an 5000 rocessed
Disposition	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	13	40	3	482	0	0	0	0	0	0
Disclosed in part	18	195	9	2325	3	1971	0	0	0	0
All exempted	0	0	0	0	0	0	1	3252	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	7	0	0	0	0	0	0	0	7	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0	0	0
Total	38	235	12	2807	3	1971	1	3252	0	0

4.5.2 Relevant pages processed and disclosed by size of requests

4.5.3 Relevant minutes processed and disclosed for audio formats

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

		Less than 60 Minutes 60-120 Minutes processed processed		More than 120 Minutes processed		
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0
Total	0	0	0	0	0	0

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

4.5.5 Relevant minutes processed and disclosed for video formats

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

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

	Less than 6				More than 120 Minutes		
	processed			tes processed	processed		
Dianasitian	Number of	Minutes	Number of	Minutes	Number of	Minutes	
Disposition	requests	Processed	requests	Processed	requests	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	0	0	0	0	0	0	
abandoned	0	0	0	0	0	0	
Neither confirmed	0	0	0	0	0	0	
nor denied	0	0	U	0	0	U	
Declined to act							
with the approval							
of the	0	0	0	0	0	0	
Information							
Commissioner							
Total	0	0	0	0	0	0	

4.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Other	Total
All disclosed	3	0	0	3
Disclosed in part	13	1	0	14
All exempted	0	0	0	0
All excluded	0	0	0	0
Request abandoned	0	0	0	0
Neither confirmed nor denied	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0
Total	16	1	0	17

4.6 Closed requests

4.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	51
Percentage of requests closed within legislated timelines (%)	77.27272727

4.7 Deemed refusals

4.7.1 Reasons for not meeting legislated timelines

	Principal Reason					
Number of Requests Closed Past the Legislated Timelines	Interference with Operations / Workload	External Consultation	Internal Consultation	Other		
15	6	0	2	7		

Number of Requests Past Number of Requests Past Legislated Timelines Where **Number of Days Past** Legislated Timeline Where **Legislated Timelines No Extension Was Taken** an Extension Was Taken Total 2 1 3 1 to 15 days 1 0 1 16 to 30 days 2 3 1 31 to 60 days 0 1 1 61 to 120 days 121 to 180 days 4 1 5 0 2 2 181 to 365 days 0 0 0 More than 365 days Total 7 8 15

4.7.2 Requests closed beyond legislated timelines (including any extension taken)

4.8 Requests for translation

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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where	9(1)(a) Interference With	9(1)(b) Consulta		9(1)c Third-Party
an Extension Was Taken	Operations/Workload	Section 69	Other	Notice
All disclosed	4	0	5	2
Disclosed in part	12	0	2	6
All exempted	1	0	0	0
All excluded	0	0	0	0
Request abandoned	1	0	0	0
No records exist	4	0	1	0
Declined to act with the approval of the Information Commissioner	0	0	0	0
Total	22	0	8	8

5.2 Length of extensions

Disposition of Requests Where	9(1)(a) Interference With	9(1)(b Consulta		9(1)c Third-Party
an Extension Was Taken	Operations/Workload	Section 69	Other	Notice
30 days or less	9	0	2	0
31 to 60 days	3	0	4	1
61 to 120 days	8	0	1	3
121 to 180 days	2	0	1	2
181 to 365 days	0	0	0	2
365 days or more	0	0	0	0
Total	22	0	8	8

Section 6: Fees

	Fee Co	lected	Fee W	aived	Fee Refunded		
Fee Type	Number of Requests	Amount	Number of Requests	Amount	Number of Requests	Amount	
Application	61	\$305.00	0	\$0.00	0	\$0.00	
Other fees	0	\$0.00	0	\$0.00	0	\$0.00	
Total	61	\$305.00	0	\$0.00	0	\$0.00	

Section 7: Consultations Received from Other Institutions and Organizations

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

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	10	83	4	1603
Outstanding from the previous reporting period	4	49	0	0
Total	14	132	4	1603
Closed during the reporting period	14	132	4	1603
Carried over to the next reporting period	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

	I	Number of Days Required to Complete Consultation Requests							
Recommendation	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	Total	
Disclose entirely	3	2	1	0	0	0	0	6	
Disclose in part	0	3	1	2	1	0	0	7	
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	1	0	0	0	0	0	1	
Total	3	6	2	2	1	0	0	14	

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

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

		Number	of days req	uired to co	mplete co	nsultation	requests	
Recommendation	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	Total
All disclosed	2	0	0	0	0	0	0	2
Disclosed in part	0	1	0	0	1	0	0	2
All exempted	0	0	0	0	0	0	0	0
All excluded	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	2	1	0	0	1	0	0	4

Section 8: Completion Time of Consultations on Cabinet Confidences

Number of Days		han 100: rocessed		Pages 501-1000 Pages essed 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
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

8.1 Requests with Legal Services

8.2 Requests with Privy Council Office

Number of Days	Fewer 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
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 9: Investigations and Reports of finding

9.1 Investigations

Section 32 Notice of intention to investigate	Subsection 30(5) Ceased to investigate	Section 35 Formal Representations
14	9	4

9.2 Investigations and Reports of finding

Section 37(1) Initial Reports			Section 37(2) Final Reports			
Received	Containing recommendation s issued by the Information Commissioner	Containing orders issued by the Information Commissioner	Received	Containing recommendations issued by the Information Commissioner	Containing orders issued by the Information Commissioner	
2	1	1	8	2	0	

Section 10: Court Action

10.1 Court actions on complaints

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

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

Section 44 – under paragraph 28(1)(b) is 0.

Section 11: Resources Related to the Access to Information Act

11.1 Allocated Costs

Expenditures	Amount		
Salaries	\$143,000		
Overtime	\$0		
Goods and Services	Goods and Services		
Professional services contracts	sional services contracts \$15,000		
Other \$0			
Total		\$158,000	

11.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	1.500
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.080
Students	0.000
Total	1.580

Note: Enter values to three decimal places.

Appendix D – Supplemental Statistical Report on the Access to Information Act and Privacy Act



Government Gouvernement du Canada

Supplemental Statistical Report on the Access to Information Act and Privacy Act

Name of institution: Canada Post Corporation

Reporting period: <u>2022-04-01</u> to <u>2023-03-31</u>

Section 1: Capacity to Receive Requests

1.1 Enter the number of weeks your institution was able to receive ATI and Privacy requests through the different channels.

	Number of Weeks
Able to receive requests by mail	52
Able to receive requests by email	52
Able to receive requests through the digital request service	52

Section 2: Capacity to Process Records

2.1 Enter the number of weeks your institution was able to process paper records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Paper Records	0	0	52	52
Protected B Paper Records	0	0	52	52
Secret and Top Secret Paper Records	0	0	52	52

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Electronic Records	0	0	52	52
Protected B Electronic Records	0	0	52	52
Secret and Top Secret Electronic Records	0	0	52	52



Section 3: Open Requests and Complaints Under the Access to Information Act

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

Fiscal Year Open Requests Were Received	Open Requests that are Within Legislated Timelines as of March 31, 2022	Open Requests that are Beyond Legislated Timelines as of March 31, 2022	Total
Received in 2021-2022	5	12	17
Received in 2020-2021	0	0	0
Received in 2019-2020	0	2	2
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016 or earlier	0	0	0
Total	5	14	19

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

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2021-2022	7
Received in 2020-2021	3
Received in 2019-2020	4
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016 or earlier	0
Total	14

Section 4: Open Requests and Complaints Under the Privacy Act

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

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2022	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2022	Total
Received in 2022-2023	51	7	58
Received in 2021-2022	3	5	8
Received in 2020-2021	0	0	0
Received in 2019-2020	0	0	0
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016	0	0	0
Received in 2014-2015	0	0	0
Received in 2013-2014 or earlier	0	0	0
Total	54	12	66

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

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints	
Received in 2022-2023	2	
Received in 2021-2022	2	
Received in 2020-2021	1	
Received in 2019-2020	1	
Received in 2018-2019	0	
Received in 2017-2018	1	
Received in 2016-2017	0	
Received in 2015-2016	0	
Received in 2014-2015	0	
Received in 2013-2014 or earlier	0	
Total	7	

Section 5: Social Insurance Number (SIN)

Did your institution receive authority for a new collection or new consistent use of the SIN in 2021-2022?	No

Section 6: Universal Access under the Privacy Act

How many requests were received from confirmed foreign nationals outside of Canada in	0
2022-2023?	0