

Report on the Administration of the *Privacy Act*

2020-2021 Annual Report



ROYAL CANADIAN MINT

PRIVACY ACT 2020-2021 ANNUAL REPORT TO PARLIAMENT

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I. INTRODUCTION

The purpose of the *Privacy Act* (the *Act*) is to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information. The *Act* also puts forward the provisions for the collection, use, disclosure and retention of personal information by government institutions. The protection and promotion of Canadians' privacy rights and the safeguarding of personal information is a priority for, and taken seriously by, the Royal Canadian Mint (the Mint).

As a federal Crown corporation, the Mint is subject to the *Act*. This Annual Report provides an account of the Mint's administration of the *Act* during the period of April 1, 2020 to March 31, 2021. The Annual Report is prepared and tabled in Parliament in accordance with section 72 of the *Act*.

A. ROYAL CANADIAN MINT

The Mint, originally a branch of Britain's Royal Mint, struck the Dominion's first domestically produced coin in 1908, and became a wholly Canadian institution in 1931. A fully commercial Crown corporation since 1969, the Mint operates for profit and its scope of activities extends throughout the world. It is classified as a Schedule III-II Corporation under the *Financial Administration Act*, the category reserved for organizations that conduct commercial operations and are self-sufficient. The Mint reports to Parliament through the Minister of Finance.

Subsection 3(2) of the *Royal Canadian Mint Act* establishes the mandate of the Mint "to mint coins in anticipation of profit and to carry out other related activities." The Mint produces and arranges for the production and supply of coins of the currency of Canada. It also produces circulation and non-circulation coins for foreign countries, produces and markets bullion coins, operates gold and silver refineries as well as conducts coin-related manufacturing and commercial activities that generate profit.

The Mint markets its goods and services throughout Canada and in many countries around the world. Its continued success and vitality as a corporation depend upon its ability to respond quickly to market demands, and compete and position itself in international and domestic markets. As a self-financing commercial Crown corporation, the Mint operates like a business while serving a public policy purpose, which is the production and distribution of Canadian circulation coins.

B. RCMH-MRCF INC.

As part of its business development initiative, the Mint set up a wholly-owned subsidiary, RCMH-MRCF Inc., which was incorporated under the *Canada Business Corporations Act* in June 2002. This holding company was formed to help the Mint improve efficiency, manage the cost of products and increase profitability.

RCMH-MRCF Inc. is a holding company and does not employ staff but has nominated a President, a Corporate Secretary, and a Treasurer as the Corporation's Officers, all of whom are employees of the Mint. As a wholly-owned subsidiary, RCMH-MRCF Inc. is subject to the *Act*.

II. ORGANIZATIONAL STRUCTURE

The Access to Information and Privacy (ATIP) Office is part of the Corporate Affairs Section within the Corporate and Legal Affairs Division of the Mint. The Director, Regulatory Affairs (Compliance), who is also the designated ATIP Coordinator, oversees the implementation of the *Act* and ensures compliance with the legislation within the Mint and its wholly-owned subsidiary, RCMH-MRCF Inc. During the reporting period, the Mint was not party to any service agreements under section 73.1 of the *Privacy Act*.

In addition to the ATIP Coordinator, the ATIP Office was composed of an ATIP Generalist position up to December 2020, as well as a Senior Program Manager, Privacy for the full reporting period. Both the ATIP Coordinator and the ATIP Generalist held duties pertaining to files other than ATIP and are therefore recorded in the attached Statistical Report as dedicating a portion of their time on the administration of the Act. The Senior Program Manager, Privacy has responsibility for the day-to-day management of the Mint's Privacy Office and corporate privacy program. The incumbent fosters a culture of privacy by leading and supporting the horizontal coordination and integration of privacy requirements and best practices in organizational activities, initiatives and decisions, developing and promoting user-friendly tools and resources, and delivering employee training and building awareness. The incumbent also provides technical and professional advisory services on all aspects of privacy compliance and privacy-related queries and issues for the organization, including Privacy Impact Assessments (PIAs) and privacy breach management. Since the creation of this position three years ago, the profile of the privacy program at the Mint continues to be elevated via increased visibility, influence and impact within the organization. During the reporting period, ATIP Office resources were also supplemented by the services of two part time consultants to assist with request processing and privacy policy and compliance matters.

III. DELEGATION ORDERS

As head of the institution, the President and CEO has overall accountability for the Act at the Mint. To assist in the discharge of the President and CEO's responsibilities, select powers, duties and functions have been formally delegated to certain positions per the organizations' respective Delegation Orders (see Attachments 1 and 2). The Delegation Orders pre-date Bill C-58 (June 19, 2019), the passage of which resulted in amendments to the Act. The Delegation Orders will be updated to reflect these amendments as such a time as TBS guidance on this matter is issued to the ATIP community at large.

IV. PERFORMANCE 2020-2021

The Statistical Report in Attachment 3 presents data on the processing of formal requests for personal information under the *Act* closed by the Mint as well as other privacy policy and compliance activities in 2020-21. This section provides a narrative summary and interpretation of that data. Where possible, a three year trend analysis is provided. As detailed later in the report, there is no statistical information to report for RCMH-MRCF Inc. (Attachment 4). The Mint also processes informal privacy requests from employees and customers as requested and as appropriate.

The Government of Canada is coordinating a procurement process to ensure modern ATIP request processing software is available to all institutions subject to the Act. The Mint continues to monitor for TBS updates in this regard, in the event efficiencies could be gained through the provisioning of new request processing software.

The following table presents an overview of the key data for the Mint (subsequent charts below provide more information).

Figure 1: Privacy Act - Overview of Key Data

	2020-	2019-	2018-
	21	20	19
Formal requests received under the Privacy Act	7	3	7
Requests outstanding from previous reporting period	3	3	2
Requests completed during the reporting period	3	3	6
Requests completed within 30 calendar days	1	1	5
Requests completed within 31-60 calendar days	1	1	1
Requests completed within 61 or more calendar days	1	1	0
Number of requests completed within legislated timeframes*	0	2	6
Number of requests completed beyond legislated timeframes	3	1	0
Public interest disclosures	0	0	0
Complaints to the Office of the Privacy Commissioner	0	0	2
Material privacy breaches	0	0	0

COVID-19 Impact: Like organizations across Canada, the Mint worked with exceptional COVID-19-related workplace measures to ensure the safety of its employees and the public. As noted in the attached Supplemental Statistical Report, the Mint had partial capacity to process paper and electronic records throughout the reporting period. This partial capacity impacted the processing of requests in progress at the start of the reporting period, as well as new requests received. The Mint continued to process requests to the extent reasonable, leveraging new ways of working and technology to sustain ATIP business continuity.

A. ROYAL CANADIAN MINT

During the 2020-21 reporting period, the Mint processed 10 requests, of which seven were new requests and three were carried over from the previous reporting period. Of these 10 requests, three were closed and seven were carried over to the 2021-22 reporting period. None of the completed requests (0%) were closed within the statutory deadline compared to one (33%) in 2019-20 and zero in 2018-19

The receipt of seven formal requests for personal information under the *Act* in the reporting period represents an increase after a slight downward trend in requests received in 2019-20 (three) and on par with the seven requests received in 2018-19.

Two of the three requests outstanding from the previous reporting period were completed. The ATIP Office provided an interim release of records to the requester for the third of these requests.

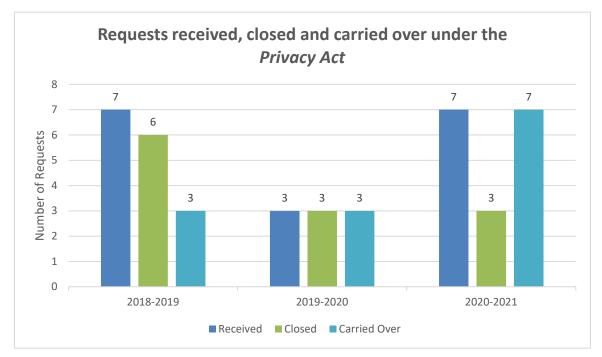


Figure 2: Requests received, closed and carried over

Disposition of Closed Requests

Of the three requests closed during this reporting period, two (66.7%) were abandoned by the requester and one (33.3%) was disclosed in part (i.e. some information was exempt from disclosure). Of note, one of the abandoned requests was discontinued by the requester further to receiving multiple interim releases of records from the ATIP Office.

Extensions

Of the three requests closed during the reporting period, two requests incurred time extensions between one and 30 days. Extensions for both requests were taken pursuant to section 15(a)(i) of the *Act* due to volume of records and/or interference to Mint operations.

Exemptions and Exclusions Used

The Mint invoked section 26 (personal information about another individual) and section 27 (solicitor-client privilege) in two requests respectively under the *Act*. These are year over year the most used exemptions. No requests were subject to any exclusions.

Size and Complexity

For requests closed in the reporting period, the Mint processed 1574 pages of which 903 were fully or partially disclosed. It should be noted that the number of pages processed does not include the number of pages that were examined to determine relevancy and identify duplicates, or interim release packages provided for active requests (346 pages).

Correction of Personal Information

No request for correction of personal information was received during the current and previous two reporting periods.

Consultations from Other Institutions

No consultation from another government institution or organization was received during the current and previous two reporting periods.

Consultations on Cabinet Confidences

The Mint did not need to consult with the Privy Council Office on Section 70 of the *Act* during the current and previous two reporting periods.

B. RCMH-MRCF INC.

During the current and previous two reporting periods, the Mint's subsidiary RCMH-MRCF Inc. did not receive any requests or requests for consultation from other government institutions or organizations.

C. RESOURCES RELATED TO THE PRIVACY ACT

The cost of administering the Mint's privacy program for this reporting period was estimated at \$199,756, which includes both salaries and professional services contracts as well as employee training and professional memberships. It should be noted that these costs do not include the resources required by other areas of the Mint to search and provide disclosure recommendations for responsive records.

In terms of resources, the number of person years dedicated to privacy activities was 1.38, which is somewhat lower than the previous reporting period (2.20 in 2019-20.). The lower number for this reporting period is in part due to employee turnover in the ATIP Office and triaging of work based on operational requirements.

V. TRAINING AND AWARENESS

The Mint marked a major development in its privacy training efforts over the course of the reporting period: the Privacy Office launched a corporate-wide mandatory privacy awareness and training emodule. Prior to this offering, privacy training had been ad hoc and limited in terms of reaching all employees. This training fulfills a key compliance requirement under section 4.2.2 of the Policy on Privacy Protection, which requires employees to be made aware of policies, procedures and legal responsibilities under the Act. Furthermore, it supports the Mint's privacy policy, which states that employees in all positions and levels shall participate in training that is current and relevant to their specific positions, duties and level of responsibility. The course is integrated into the Mint's onboarding process for new employees and its plain language and user-friendly design does not presume any previous privacy training by participants.

Training on privacy matters also occurs throughout the year via meetings and informal briefings with employees in different functional areas working on projects and initiatives that have privacy compliance components as well as in response to areas facing challenges in the protection of personal information. For example, in this reporting period, the Senior Program Manager, Privacy jointly delivered a pilot awareness session with the Manager of Corporate Health & Safety to a group of five Protective Services managers on the topic of reporting accidents and injuries and the related privacy aspects of this process including the impacts of breaches. This session is expected to be rolled out to a broader audience of people leaders in Protective Services and Operations in the next reporting period.

VI. POLICIES, GUIDELINES, PROCEDURES AND INITIATIVES

- 1. Corporate privacy management framework: The Mint recognizes that privacy protection is essential in maintaining the trust and confidence of employees, customers and stakeholders and is therefore critical to its success and achievement of business objectives. To this end, and in support of the RCM's corporate privacy program and Privacy Office, the Mint created the Privacy Accountability Working Group (PAWG), which had its inaugural meeting in January of 2021. The PAWG promotes the consistent and proactive implementation of the Mint's corporate privacy policy, from which it derives its authority, across the organization and coordinates privacy management issues in consideration of cross-functional impacts. The specific objectives of the group are to: promote a culture of privacy protection and awareness across the organization; further the integration of privacy protection and best practices in applicable business activities and matters; and support the RCM Privacy Office in its compliance and privacy program management activities. The group's composition includes members from business areas such as HR, Sales, Procurement, Information and Physical Security and Internal Audit.
- **2. Privacy Office subject matter expertise:** Over the course of the reporting period, the Privacy Office engaged with numerous internal stakeholders to provide privacy compliance and best practice advice and guidance. The most common items for which privacy input was solicited were notice statements for both internal and external surveys and other outreach activities, review and/or development of privacy clauses for contractual agreements and vendor terms of service reviews. In January 2021, the Mint launched its redesigned Master's Club Loyalty Program. The Privacy Office was engaged in this initiative in order to provide advice on privacy-related collection and use issues and to update the website privacy notice to reflect program updates (see more below in section X Privacy Impact Assessments).

COVID-19 Response: The COVID-19 pandemic raised numerous complex issues in occupational health and safety space for the protection of privacy and personal information at the Mint. As a result, the Privacy Office spent a significant amount of time dedicated to the privacy issues surrounding the Mint's response to the pandemic. Like many other organizations, the Mint had to quickly transition many people to a remote working environment however within two weeks of the start of the pandemic, the Mint's refinery and production plant resumed full operations as an essential service with these employees reporting to work onsite in both Ottawa and Winnipeg. Guided by interim TBS policy and directives, the OPC framework to assess privacy-impactful initiatives in response to the pandemic and other related publications, the Mint's Privacy Office worked closely with Human Resources, Operations, Health and Safety, Communications and Legal Services throughout the implementation of onsite thermometer stations and related protocols, self-screening mechanisms, employee surveys, workplace close contact review processes and liaisons with public health authorities.

The Privacy Office also contributed to guidance and best practice materials about security and privacy for employees working remotely as well as for video-conferencing technology. As the pandemic and public health measures evolve through different stages, the Privacy Office continues to monitor developments in regulatory guidance, public health directives and lessons learned in

order to provide the privacy expertise and input required on important health and safety and compliance matters across the organization.

- **3. Info Source and Mint Website:** The Mint maintains a description of its record groupings and personal information holdings, aligned with its business lines and related programs, known as Info Source. This web publication, available on mint.ca, assists individuals to exercise their rights under the *Act* by providing an overview of the information held by the Mint. An updated 2020 Info Source chapter was published in the current reporting period, which included a new Class of Record for the Mint's Due Diligence Activities with a related Personal Information Bank under development. The Mint will continue to make changes and updates as required over the course of the next reporting period.
- **4. Global Privacy Laws: General Data Protection Regulation (GDPR) & California Consumer Privacy Act (CCPA):** The Mint first undertook an initial assessment of the applicability of the European Union's GDPR to its business activities in early 2018 and the Mint's monitoring of GDPR guidance, case law and other regulatory developments remains ongoing. Any contemplated and future Mint initiatives, programs or activities that may involve European Union data subjects are reviewed for GDPR applicability and compliance as a condition of implementation.

With respect to the CCPA, the Mint published a website privacy notice for California consumers in June of 2020. It provides information about the collection, use and disclosure of California consumers' personal information (as defined under the CCPA) in their interactions with the Mint. It also describes the rights of California consumers under CCPA and how they may exercise them.

5. Standard Operating Procedure (SOP) - Informal Requests from Executors, Estate Trustees, and Powers of Attorney related to RCM Customer Accounts: The Privacy Office, in collaboration with the Customer Service Centre (CSC) and Legal Services, developed this SOP in response to an identified need for clarity and better defined roles and responsibilities involving informal requests for access to personal information received by the CSC as the first point of contact. The SOP describes the process for fulfilling informal requests received from executors, estate trustees, powers of attorney, or other representatives in relation to RCM customer accounts. Such requests involve: 1) a request for a copy of a customer's personal information (e.g. purchase history); and/or, 2) a request for action(s) to be taken in relation to a customer account (e.g. issue a refund or close an account). While the SOP became effective in the month after the close of the reporting period, the drafting and consultation work for the document occurred over the course of the first several months of 2021.

VII. KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS OR AUDITS

No complaints were received from the OPC and no privacy-related audits occurred in the current reporting period.

VIII. MONITORING COMPLIANCE

ATIP Office staff meets on a weekly basis for a fulsome discussion of all ATIP-related matters including request-processing time, action items, upcoming deadlines and ongoing monitoring. Informal discussions often occur daily. The ATIP Coordinator provides briefings to the VP, General Counsel and Corporate Secretary on a weekly basis, or as required. The President & CEO receives a monthly report from the ATIP Office, which provides an overview of, and status update for, all ATIP files. The President & CEO receives in-person briefings on an as needed basis.

IX. MATERIAL PRIVACY BREACHES

No material privacy breach occurred in the current and previous reporting period (and therefore no need for reporting to the Office of the Privacy Commissioner and to Treasury Board of Canada Secretariat (TBS), Information and Privacy Policy Division).

X. PRIVACY IMPACT ASSESSMENTS

In accordance with the TBS *Directive on Privacy Impact Assessment*, the Mint is required to conduct a PIA before proceeding with a new or substantially modified program or activity that involves personal information for administrative use(s). By identifying and assessing risks, PIAs ensure that the Mint's programs and activities are compliant with privacy requirements in accordance with the *Act*, are aligned with best practices for privacy protection and are subject to the appropriate privacy risk mitigation plans. The Mint's updated corporate privacy policy makes explicit reference to the PIA requirement and assigns responsibility for funding, initiating, completing and maintaining these risk assessments.

Due Diligence Activity PIA: A PIA report for the Mint's Know Your Customer, Know Your Agent and Know Your Supplier activities (collectively referred to as Due Diligence Activities) was approved by the VP, CLA on February 12, 2021.

New Master's Club program PIA: A small-scale PIA undertaken in light of the newly redesigned loyalty program launched in January 2021 as discussed above. It was approved by the CCO on March 29, 2021.

Despite internal approvals, both of these PIA reports are not considered closed within the reporting period given that they were sent to the OPC and/or TBS after March 31, 2021. They will be reflected as closed in the next reporting period.

Other PIAs with significant development and work within the reporting period include:

Travel & Expense Solution Software PIA: Travel and hospitality expense management forms a critical component of the Mint's business. In order to modernize related business practices, gain efficiencies, and heighten consistency in the Mint's travel and hospitality processes, a third party cloud-based software was selected for implementation. The PIA was initiated and appropriately scoped to ensure the Mint meets its obligations under the *Privacy Act* and related policy instruments, while recognizing that it is unlikely for new types of personal information to be collected, used or disclosed in relation to the software. This PIA will be reflected as closed in the next reporting period.

Digital Experience Platform (DEP) PIA: The Mint is in the process of significant business and digital transformation to enhance business capabilities and replace systems that are nearing end of life. As part of this transformation, the Mint is replacing the Mint.ca eCommerce platform with a new platform, referred to as the "Digital Experience Platform" (DEP). The DEP is an early component of the Mint's One Mint vision, a broad strategy that includes significant digital transformation to support its Business to Consumer (B2C) numismatic business. While much of the ecommerce functionality will remain the same, despite existing on a new platform, some new functionality will be introduced, and the new program will fundamentally alter several aspects of how personal information is collected, used, stored, and disclosed. The PIA assesses the DEP in accordance with applicable legal and policy requirements as it is intended to be implemented at the operational stage and is expected to be complete in the next reporting period.

XI. PUBLIC INTEREST DISCLOSURES

No disclosure of personal information was made pursuant to paragraph 8(2)(m) of the *Act* for both the Mint and its subsidiary RCMH-MRCF Inc. during the current and previous three reporting periods.

Attachment 1

DELEGATION ORDER, RCM

Privacy Act



Delegation Order - Privacy Act and Privacy Regulations

Arrêté de délégation en vertu de la Loi sur la protection des renseignements personnels et du Règlement sur la protection des renseignements personnels

The President and CEO of the Royal Canadian Mint, pursuant to section 73 of the *Privacy Act**, hereby designates the persons holding the positions set out below, or the persons occupying on an acting basis those positions, to exercise the powers and perform the duties and functions of the President and CEO as the head of the Royal Canadian Mint, under the provisions of the Act and related regulations set out in the schedule opposite each position. This document replaces and repeals all previous delegation orders.

En vertu de l'article 73 de la Loi sur la protection des renseignements personnels *, le président de la Monnaie royale canadienne délègue aux titulaires des postes sous mentionnés, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions, les fonctions et les pouvoirs dont il est, en qualité de responsable de la Monnaie royale canadienne, investi par les dispositions de la Loi ou de son règlement mentionnées en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

* S.C. 1980-81-82-83, c. 111, Sch. I "73"

* S.C. 1980-81-82-83, ch. III, ann. I « 73 »

	Privacy Act			
Provision Disposition	Loi sur la protection des renseignements personi Description	Vice-President, Corporate and Legal Affairs; ATIP Coordinator	Senior Program Manager, Privacy	ATIP Generalist
		Vice-président, Affaires générales et juridiques; Coordonnatrice, AIPRP	Chef principale de programme, protection des renseignements personnels	Généraliste, AIPRP
8(2)(j)	Disclosure for research or statistical purposes Communication pour des travaux de recherche ou de statistique	•	•	
8(2)(m)	Disclosure in the public interest or in the interest of the individual Communication dans l'intérêt public ou de l'individu	•	•	

19	Personal information obtained in confidence Renseignements personnels obtenus à titre	•		
	Fichiers inconsultables		I .	
18(2)	Exempt banks	•		
		Vice-président, Affaires générales et juridiques; Coordonnatrice, AIPRP	Chef principale de programme, protection des renseignements personnels	Généraliste AIPRP
Disposition		Corporate and Legal Affairs; ATIP Coordinator	Manager, Privacy	Generalist
Provision	Exemption Provisions of the <i>Privacy Act</i> Dispositions d'exception de la <i>Loi sur la protection</i> Description	Vice-President,	personnels Senior Program Manager,	ATIP Generalist
17(3)(b)	Access in an alternative format Communication sur support de substitution	•		41.
17(2)(b)	Language of access Version de la communication	•		•
15	Extension of time limits Prorogation du délai	•		·
14(b)	Giving access to the record or part thereof Donner communication totale ou partielle du document	•		•
14(a)	Notice where access requested Notification de l'auteur de la demande	•		•
10	Personal information banks Fichiers de renseignements personnels	•	•	
9(4)	Consistent uses Usages compatibles	•	•	
9(1)	Record of disclosures Relevé des cas d'usage	•	•	
3(5)	Notice of disclosure under paragraph 8(2)(m) Avis de communication en vertu de l'alinéa 8(2)m)	•	•	
(4)	Copies of requests under paragraph 8(2)(e) Copies des demandes faites en vertu de l'alinéa 8(2)e)			

51(2)(b), 51(3) 72	Règles spéciales pour les auditions Annual report to Parliament	•		
	·	ı		
	Special rules for hearings	•		
	Avis des mesures pour la mise en œuvre des recommandations du Commissaire à la protection de la vie privée au sujet des fichiers inconsultables			
36(3)(b)	Notice of actions to implement recommendations of Privacy Commissioner concerning exempt banks	•	•	
35(4)	Access to be given to complainant Communication accordée au plaignant	•		
	Avis des mesures pour la mise en œuvre des recommandations du Commissaire à la protection de la vie privée			
35(1)(b)	Notice of actions to implement recommendations of Privacy Commissioner	8	•	_
	Droit de présenter des observations	•	•	
33(2)	Right to make representations	AIPRP		
		Vice-président, Affaires générales et juridiques; Coordonnatrice,	Chef principale de programme, protection des renseignements personnels	Généralist AIPRP
Disposition		Corporate and Legal Affairs; ATIP Coordinator	Manager, Privacy	Generalis
Provision	Description	Vice-President,	Senior Program	ATIP
	Other Provisions of the <i>Privacy Act</i> Autres dispositions de la <i>Loi sur la protection des</i>	renseignements pers	sonnels	
	Dossiers médicaux			
28	Renseignements protégés : brevets et marques de commerce Medical records			
27.1	Protected information — patents and trade-marks	•		<u> </u>
27	Solicitor-client privilege Secret professionnel des avocats	•		
26	Information about another individual Renseignements concernant un autre individu	•		
25	Safety of individuals Sécurité des Individus	•		
	Individus condamnés pour une infraction	•		
24	Enquêtes de sécurité Individuals sentenced for an offence			
23	d'actes répréhensibles Security clearances	•		<u> </u>
22.3	Public Servants Disclosure Protection Act Loi sur la protection des fonctionnaires divulgateurs	•		

	Privacy Regulations Règlement sur la protection des renseigneme	ents personnels		
Provision Disposition	Description	Vice-President, Corporate and Legal Affairs; ATIP	Senior Program Manager, Privacy	ATIP Generalist
		Coordinator		
		Vice-président, Affaires générales et juridiques; Coordonnatrice, AIPRP	Chef principale de programme, protection des renseignements personnels	Généraliste, AIPRP
7	Retention of personal information requested under paragraph 8(2)(e) Conservation des renseignements personnels demandés en vertu de l'alinéa 8(2)e)	•	•	
9	Examination of information Consultation sur place	•	li de la constanta de la const	
11(2), 11(4)	Notification concerning corrections Avis concernant les corrections	•	•	
13(1)	Disclosure of personal information relating to physical or mental health Communication des renseignements personnels concernant l'état physique ou mental	•		
14	Examination in presence of medical practitioner or psychologist	•		

Dated at Ottawa, Canada on	June 12	2019
Daté à Ottawa, Canada, le	12 Juin	2019

Marie Lemay
President and CEO / Présidente de la Monnaie

Attachment 2

DELEGATION ORDER, RCMH-MRCF Inc.

Privacy Act

PRIVACY ACT DELEGATION ORDER

The President of RCMH-MRCF Inc., pursuant to section 73 of the *Privacy Act**, hereby designates the person holding the position of ATIP Coordinator at the Royal Canadian Mint to exercise the powers and perform the duties and functions of the President as the head of a government

* S.C. 1980-81-82-83, c. 111, Sch. I "73"

institution under the Act.

ARRÊTÉ SUR LA DÉLÉGATION EN VERTU DE LA LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

En vertu de l'article 73 de la Loi sur la protection des renseignements personnels*, le président de RCMH-MRCF Inc. délègue au titulaire du poste de Coordonnatrice, AIPRP à la Monnaie royale canadienne les attributions dont il est, en qualité de responsable d'une institution fédérale, investie par la Loi.

* S.C. 1980-81-82-83, ch. III, ann. I « 73 »

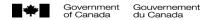
Dated at Ottawa, Canada on	2018
Daté à Ottawa, Canada, le 12, Juin	2018
Jennifer Camelon	
President, RCMH-MRCF Inc. /	
Présidente de MRCH-MRCF Inc.	
Simon Kamel	

Chairperson of the Board, RCMH-MRCF Inc. /
Président, Conseil d'administration de MRCH-MRCF Inc.

Attachment 3

STATISTICAL REPORT, RCM

Privacy Act



Statistical Report on the *Privacy Act*

Name of institution: Royal Canadian Mint

Reporting period: 2020-04-01 to 2021-03-31

Section 1: Requests Under the Privacy Act

1.1 Number of requests

	Number of Requests
Received during reporting period	7
Outstanding from previous reporting period	3
Total	10
Closed during reporting period	3
Carried over to next reporting period	7

Section 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Diamonition of	Completion Time							
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	0	0	0	0	0	0	0	0
Disclosed in part	0	0	1	0	0	0	0	1
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	1	0	0	0	0	0	1	2
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	1	0	1	0	0	0	1	3



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)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	2
19(1)(f)	0	22.1	0	27	2
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
	•	22.4	0	Ī	•

2.3 Exclusions

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

2.4 Format of information released

Paper	Electronic	Other
0	1	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
1574	903	3

2.5.2 Relevant pages processed and disclosed by size of requests

	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
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	0	0	0	0	0	0	0	0	0	0
Disclosed in part	1	68	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	1	0	0	0	0	0	1	835	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2	68	0	0	0	0	1	835	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	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

2.7 Deemed refusals

2.7.1 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	
3	2	0	0	1	

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

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

2.8 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 3: Disclosures Under Subsections 8(2) and 8(5)

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

Section 4: Requests for Correction of Personal Information and Notations

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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

		15(a)(i) Interferen	ce with operations	15 (a)(ii) Consultation				
Number of								
requests	Further review				Cabinet			15(b)
where an	required to				Confidence			Translation
extension	determine	Large volume of	Large volume of	Documents are	Section (Section			purposes or
was taken	exemptions	pages	requests	difficult to obtain	70)	External	Internal	conversion
2	0	1	1	0	0	0	0	0

5.2 Length of extensions

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

Section 6: Consultations Received From Other Institutions and Organizations

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

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

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

	N	umber of	Days Re	quired to C	omplete C	Consultation		s
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	Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
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	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

		Number o	of days re	quired to c	omplete c	onsultation	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	Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
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	0	0	0	0	0	0	0	0

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Requests		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

7.2 Requests with Privy Council Office

		Than 100 Pages 101–500 Pages Processed Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed		
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	-	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 8: Complaints and Investigations Notices Received

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

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed	0

9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	45	0	0	0

Section 10: Material Privacy Breaches

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

Section 11: Resources Related to the Privacy Act

11.1 Costs

Expenditures	Amount	
Salaries		\$150,000
Overtime	Overtime	
Goods and Services	Goods and Services	
Professional services contracts	\$47,689	
Other	\$2,067	
Total		\$199,756

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	1.150
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.230
Students	0.000
Total	1.380

Note: Enter values to three decimal places.

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

Name of institution:	Royal Canadian Mint			
Reporting period:	2020-04-01	to	2021-03-31	

Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATIP 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	52	0	52
Protected B Paper Records	0	52	0	52
Secret and Top Secret Paper Records	0	52	0	52

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

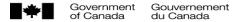
	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Electronic Records	0	52	0	52
Protected B Electronic Records	0	52	0	52
Secret and Top Secret Electronic Records	0	52	0	52



Attachment 4

STATISTICAL REPORT, RCMH-MRCF Inc.

Privacy Act



Statistical Report on the *Privacy Act*

Name of institution: RCMH-MRCF Inc.

Reporting period: 2020-04-01 to 2021-03-31

Section 1: Requests Under the Privacy Act

1.1 Number of requests

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting period	0
Total	0
Closed during reporting period	0
Carried over to next reporting period	0

Section 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Diamonition of	Completion Time								
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	0	0	0	0	0	0	0	0	
Disclosed in part	0	0	0	0	0	0	0	0	
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	0	0	0	0	0	0	0	
Neither confirmed nor denied	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	



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)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

2.3 Exclusions

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

2.4 Format of information released

Paper	Electronic	Other
0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages	Number of Pages	
Processed	Disclosed	Number of Requests
0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
Disposition	Number of Requests	Pages Disclosed	Number of Requests		Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

2.5.3 Other complexities

	Consultation	Legal Advice	Interwoven		
Disposition	Required	Sought	Information	Other	Total

All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

	Principal Reason
·	

Number of Requests Closed Past the Legislated Timelines	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

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

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

2.8 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 3: Disclosures Under Subsections 8(2) and 8(5)

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

Section 4: Requests for Correction of Personal Information and Notations

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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

		15(a)(i) Interferen	ce with operations	15 (a)(ii) Consultation				
Number of								
requests	Further review				Cabinet			15(b)
where an	required to				Confidence			Translation
extension	determine	Large volume of	Large volume of	Documents are	Section (Section			purposes or
was taken	exemptions	pages	requests	difficult to obtain	70)	External	Internal	conversion
0	0	0	0	0	0	0	0	0

5.2 Length of extensions

	•	15 (a)(ii) Consultation						
	Further review				Cabinet			15(b)
	required to				Confidence			Translation
Length of	determine	Large volume of	Large volume of	Documents are	Section (Section			purposes or
Extensions	exemptions	pages	requests	difficult to obtain	70)	External	Internal	conversion

1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

Section 6: Consultations Received From Other Institutions and Organizations

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

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

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

	N	Number of Days Required to Complete Consultation Requests						
		Wore						
							Than	
	1 to 15	16 to 30	31 to 60	61 to 120	121 to	181 to 365	365	
Recommendation	Days	Days	Days	Days	180 Days	Days	Days	Total

All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
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	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

		Number o	of days re	quired to c	omplete c	onsultation	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	Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
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	0	0	0	0	0	0	0	0

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

	Fewer Than 1 Process	•	101-500 Proce	•		-1000 Processed		1-5000 Processed		an 5000 rocessed
					Number				Number	
Number of	Number of	Pages	Number of	Pages	of	Pages	Number of	Pages	of	Pages
Days	Requests	Disclosed	Requests	Disclosed	Requests	Disclosed	Requests	Disclosed	Requests	Disclosed

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

7.2 Requests with Privy Council Office

	Fewer Than 1 Proces	•	101–500 Proce	_		-1000 Processed		1-5000 Processed		an 5000 rocessed
Number of Days	Number of Requests	Pages Disclosed	Number of Requests		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 8: Complaints and Investigations Notices Received

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

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed 0

9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	0	0	0	0

Section 10: Material Privacy Breaches

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

Section 11: Resources Related to the *Privacy Act*

11.1 Costs

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

11.2 Human Resources

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

Total	0.000
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Note: Enter values to two decimal places.

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

Name of institution:	RCMH-MRCH Inc.			
Reporting period:	2020-04-01	to	2021-03-31	

Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATIP 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	52	0	52
Protected B Paper Records	0	52	0	52
Secret and Top Secret Paper Records	0	52	0	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	52	0	52
Protected B Electronic Records	0	52	0	52
Secret and Top Secret Electronic Records	0	52	0	52

