Office of the Information Commissioner of Canada

2014-15

Departmental Performance Report

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Minister of Justice and Attorney General of Canada

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Message from the Commissioner

The year 2014–2015 was a particularly challenging one for my office. We made significant inroads on some files and as an organization we continued to introduce measures to ensure we are working as effectively as possible. However, as was noted in our 2013–2014 *Departmental Performance Report*, the financial constraints on my office have been hindering our efforts to deliver on our mandate to protect information rights under the *Access to Information Act*. Our requests for



additional resources have been so far refused. Consequently, our inventory grew over the year 2014–2015, thereby increasing the risk that complaints will not be investigated in a timely manner. This ultimately results in an erosion of access rights.

As mentioned above, we have made significant progress on some fronts, particularly through our interventions before the federal courts. These courts' decisions will bring much needed clarity to the use of time extensions and of fees for electronic records, allowing us to move forward on a number of files. We have also tabled a special report in Parliament on modernizing the *Access to Information Act*. Unfortunately, our call for modernization has been left unanswered.

At a corporate level, we have continued to make difficult decisions to keep within appropriations and deliver on our mandate and maintain excellence in governance. My team has shown great resolve over the past year as it continued to do more with fewer resources.

We are a lean and efficient office and rely on a dedicated and high-performing group of employees. Regardless of the financial constraints imposed on my office, I know that, together, we will continue to strive for excellence and to protect Canadians' quasi-constitutional right of access to government information.

Section I: Organizational Expenditure Overview

Organizational Profile

Commissioner: Suzanne Legault

Enabling Instrument: Access to Information Act (R.S.C., 1985, C-1)¹

Year Established: 1983

Organizational Context

Raison d'être

The Information Commissioner of Canada reports directly to the House of Commons and Senate. The Office of the Information Commissioner of Canada ensures that the rights conferred by the *Access to Information Act* are respected, which ultimately enhances transparency and accountability across the federal government.¹

Responsibilities

The Office of the Information Commission of Canada (OIC) is an independent public body created in 1983 under the *Access to Information Act*. The OIC's primary responsibility is to conduct efficient, fair and confidential investigations into complaints about federal institutions' handling of access to information requests. The OIC strives to maximize compliance with the Act while fostering disclosure of public sector information using the full range of tools, activities and powers at the Commissioner's disposal.

The OIC primarily uses mediation and persuasion to resolve complaints. In doing so, the OIC gives complainants, heads of institutions and all third parties affected by complaints a reasonable opportunity to make representations. The OIC encourages institutions to disclose information as a matter of course and to respect Canadians' rights to request and receive information, in the name of transparency and accountability. The OIC brings cases to the Federal Court to ensure that the Act is properly applied and interpreted, with a view to maximizing disclosure of information.

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¹ The OIC's 2014–2015 Strategic Outcome reads as follows: "Requestors' rights under the *Access to Information Act* are safeguarded." The rights conferred by the Act, in fact, extend to government institutions, who have the right—and, sometimes, the obligation—to withhold information from release to requestors. Consequently, the Commissioner has revised this statement, and the OIC's single Strategic Outcome no longer refers to "requestors."

The OIC also supports the Information Commissioner in her advisory role to Parliament and parliamentary committees on all matters pertaining to access to information. The OIC actively makes the case for greater freedom of information in Canada through targeted initiatives such as Right to Know Week and ongoing dialogue with Canadians, Parliament and federal institutions.

The following diagram shows the OIC's organizational structure.



Legal Services represents the Commissioner in court as she seeks to clarify points of access law and uphold information rights. OIC lawyers provide legal advice on investigations, and administrative and legislative matters, as well as customized reference tools and training on recent case law. Legal Services also monitors legislative developments to determine their possible effect on the Commissioner's work and access to information in general.

The Complaints Resolution and Compliance Branch investigates individual complaints about the processing of access requests, conducts dispute resolution activities and makes formal recommendations to institutions, as required. The Branch also carries out systemic investigations and analysis.

Corporate Services provides strategic and corporate leadership for planning and reporting, communications, human resources and financial management, security and administrative services, internal audit and evaluation, as well as information management and technology. Corporate Services conducts external relations with a wide range of stakeholders, notably Parliament, governments and representatives of the media, and provides input to the Treasury Board of Canada Secretariat on improving the administration of the Act. Corporate Services is also responsible for managing the OIC's access to information and privacy function.

Strategic Outcome and Program Alignment Architecture

1. Strategic Outcome: Rights under the Access to Information Act are safeguardedⁱⁱ

1.1 Program: Compliance with access to information obligations

Internal Services

Organizational Priorities

The following were the Commissioner's organizational priorities for 2014–2015, as set out in the OIC's 2011–2014 strategic plan.²

Priority	Туре	Program
Exemplary service delivery to Canadians		Compliance with access to information obligations

Summary of Progress

Despite strained resources, the Commissioner continued to provide excellent service to Canadians through her investigations. She received 1,749 new complaints, closing 1,605, and carried out a pilot project to resolve certain complaints more quickly through the use of mediation. The Commissioner successfully pursued several matters in court that will affect a number of ongoing investigations. In 2014, the Federal Court of Appeal confirmed that timeliness is a constituent part of the right of access. The decision is expected to reduce the length of time extensions institutions take to respond to requests. In March 2015, the Federal Court agreed with the Commissioner's position that emails and word-processing files are computerized records. This means that institutions are no longer allowed to charge search and preparation fees for these records.

Priority	Туре	Program
A leading access to information regime		Compliance with access to information obligations

Summary of Progress

The Commissioner published a comprehensive report on modernizing the *Access to Information Act* in March 2015.³ This was the last key commitment under the 2011–2014 strategic plan left to meet. The report contains 85 recommendations—anchored in over 30 years of experience at the OIC—designed to bring Canada's freedom of information law into line with the most progressive national and international standards. The Commissioner completed two outstanding systemic investigations. She also published her observations on the health of the access system, based on an analysis of publicly available information on 24 institutions for 2012–2013.⁴ In the fall of 2014, the Commissioner wrote to the President of the Treasury Board of Canada to share her perspective on the Government of Canada's draft Action Plan 2.0 under the Open Government Partnership. Finally, the Commissioner hosted, along with the Privacy Commissioner, a conference for federal, provincial and territorial access to information and privacy commissioners in October 2014.

ii See note i.

Priority	Туре	Program
An exceptional workplace		Compliance with access to information obligations
		Internal services

Summary of Progress

The Commissioner implemented her talent management program and ensured it was compliant with the Directive on Performance Management. The Commissioner also pursued shared services opportunities with fellow agents of Parliament and other small organizations. The Commissioner instituted a Code of Values and Ethics for the OIC.

Risk Analysis

Key Risks

Risk	Risk Response Strategy	Link to Program Alignment Architecture
Resources: That ongoing financial restraint will result in the OIC being unable to adequately fulfill its mandate of safeguarding information rights under the Access to Information Act	 Developed and is pilot testing a lean investigation process to enhance efficiency and predictability Provided training and development opportunities for investigators Continued discussions with ministers and central agencies 	Compliance with access to information obligations
Growing complaints inventory: That the 30-percent increase in the volume of complaints experienced in 2013–2014, plus an increase in complex investigations in 2014–2015, and the heightened fiscal restraint within the OIC, will lead to an increase in the inventory of complaints. This will impede the OIC's ability to investigate complaints in a timely manner, which will ultimately result in an erosion of access rights	 Developed and is pilot testing a lean investigation process to enhance efficiency and predictability Established multi-disciplinary teams made up of in-house subject-matter experts to target specific complex investigations 	Compliance with access to information obligations
Human resources: That employee workload and turnover will have an impact on the organization's ability to deliver its mandate and meet its obligations as a federal entity, due to its small size	 Implemented talent management program to ensure excellence in all areas Pursued shared services opportunities to supplement inhouse services when required 	Compliance with access to information obligations Internal services

The Commissioner continued to introduce measures to ensure her office is working as effectively as possible. Nonetheless, the Commissioner closed fewer complaints in 2014–2015 than she did the previous year. This was due to two reasons. First, there were a number of complex investigations in 2014–2015 that required the dedicated attention of a number of investigators. Second, there was a reduction in financial resources available. Under current staffing levels, there is insufficient investigative capacity within the OIC to address the current inventory of complaints, absorb the number of new complaints and undertake complex investigations.

Together, these various factors are hindering the Commissioner's efforts to deliver on her mandate. Her ability to adequately safeguard information rights is effectively in jeopardy. In practical terms, these factors are increasing the risk that complaints will not be investigated in a timely manner, which will ultimately result in an erosion of access rights.

The Corporate Services team continued to work at the minimum size. This has meant the Commissioner has been able to devote as many resources to the program as possible. However, it is putting corporate memory (increasing the risk of error) and the Commissioner's ability to meet policy and other obligations at risk. The stretched capacity of the team is making it difficult to respond to unforeseen circumstances without having to put other priorities aside. It also increases the risk of employee burnout. One way the Commissioner is seeking to mitigate these risks is by entering into agreements with other organizations to share services, to take advantage of expertise the OIC does not have in-house.

Actual Expenditures

Budgetary Financial Resources (dollars)

	Planned Spending	Total Authorities		Difference (actual minus planned)
\$11,200,960	\$11,200,960	\$11,910,330	\$11,770,808	\$569,848

Human Resources (Full-Time Equivalents [FTEs])

	Actual	2014–15 Difference (actual minus planned)
93	90	(3)

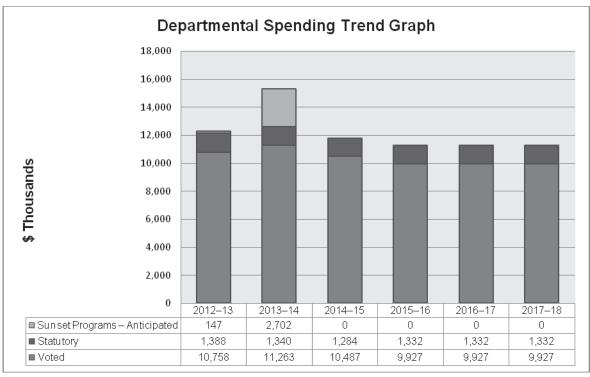
Budgetary Performance Summary for Strategic Outcome and Program (dollars)

Strategic Outcome, Program and Internal Services	2014–15 Main Estimates	2014–15 Planned Spending	2015–16 Planned Spending	2016–17 Planned Spending	2014–15 Total Authorities Available for Use	2014–15 Actual Spending (authorities used)	2013–14 Actual Spending (authorities used)	2012–13 Actual Spending (authorities used)
Strategic Outco	ome: Rights unde	r the Access to	Information Act	are safeguarded	d			
Compliance with access to information obligations	\$8,624,739	\$8,624,739	\$8,669,716	\$8,669,716	\$9,170,954	\$9,152,469	\$9,961,251	\$9,179,989
Internal services	\$2,576,221	\$2,576,221	\$2,589,656	\$2,589,656	\$2,739,376	\$2,618,339	\$5,343,842	\$3,112,691
Total	\$11,200,960	\$11,200,960	\$11,259,372	\$11,259,372	\$11,910,330	\$11,770,808	\$15,305,093	\$12,292,680

The Commissioner's single program and related spending fall under Government Affairs in the whole-of-government framework and align to the following Government of Canada outcome: A transparent, accountable and responsive federal government.⁵

For more information on the OIC's spending, see "Departmental Spending Trend," below.

Departmental Spending Trend



The OIC's expenditures have been on a downward trend since 2012–2013, with the exception of 2013–2014. That year, spending was artificially high due to the mandatory relocation of the OIC's office from Ottawa to Gatineau in early 2014.

With Total Authorities of less than \$12 million in 2014–2015, the OIC used nearly all of its limited resources, lapsing \$139,522. This meant that the Commissioner had no financial flexibility to augment her investigative capacity or to respond to unforeseen circumstances.

The impact of the operational spending freeze announced in the 2013 Speech from the Throne is not factored into these levels. The freeze means the OIC will have to absorb salary increases until 2015–2016

Otherwise, and assuming the government does not announce further budget reduction or cost containment measures, the authority levels will remain constant from 2015–2016 to 2017–2018. These funding levels are the lowest since 2009–2010 in the context of an ever-growing inventory.

Effective management of public funds is of paramount importance. The Commissioner has had to make, and will continue to make, difficult decisions to keep within appropriations, deliver her mandate and maintain excellence in governance. Her success in this regard in recent years has resulted in a very lean organization.

Expenditures by Vote

For information on the Office of the Information Commissioner of Canada's organizational voted and statutory expenditures, consult the Public Accounts of Canada 2015 (under Department of Justice Canada), which is available on the Public Works and Government Services Canada website.⁶

Section II: Analysis of Program by Strategic Outcome

Strategic Outcome

Rights under the Access to Information Act are safeguardediii

Program

Compliance with access to information obligations

Description

The Access to Information Act is the statutory authority for the oversight activities of the Information Commissioner, which are: to investigate complaints from requestors; to review the performance of government institutions; to report results of investigations/reviews and recommendations to complainants, government institutions and Parliament; to pursue judicial enforcement; and to provide advice to Parliament on access to information matters. The Office of the Information Commissioner supports the Commissioner in carrying out these activities.

Budgetary Financial Resources (dollars)

2014–1 Main E		Planned Spending	Total Authorities	Actual Spending (authorities used)	2014–15 Difference (actual minus planned)
	\$8,624,739	\$8,624,739	\$9,170,954	\$9,152,469	\$527,730

Human Resources (FTEs)

2014–15 Planned	Actual	2014–15 Difference (actual minus planned)
70	67	(3)

iii See note i.

Performance Results*

Expected Results	Performance Indicators	Targets	Actual Results
Canadians receive timely resolution of complaints about how federal	Percentage of administrative cases completed within 90 days	85 percent	63 percent
institutions process access to information requests	Percentage of priority/early resolution cases completed within 6 months	75 percent	58 percent
Institutions meet their obligations under the Access to Information Act and adopt measures to	Percentage of recommendations from investigations that are adopted	95 percent	99 percent
address institutional and systemic issues affecting access to information	Percentage of recommendations from report cards and systemic investigations that are adopted	80 percent	38 percent The Commissioner did not issue report cards in 2014–2015. The two systemic investigations completed (on interference and consultations) contained 13 recommendations in total. The President of the Treasury Board did not address the Commissioner's five recommendations on interference. Of the eight recommendations related to consultations, the President agreed to implement five.

^{*} The OIC's 2015–2016 Report on Plans and Priorities indicated that, due to the financial situation, the OIC would be unable to meet these targets.

Performance Analysis and Lessons Learned

Exemplary service to Canadians. The Commissioner closed 1,605 complaints in 2014–2015 while receiving 1,738 new files. As a result, the inventory of complaints grew for a second year.

The Commissioner strove to meet her productivity targets. She reduced by a week the overall median time it took to complete a complaint, to 83 days.

The Commissioner carried out a pilot project to increase the use of mediation during investigations. Of 318 files in the pilot, 70 percent were mediated. Of those, 12 percent were narrowed in scope, 22 percent were amalgamated with other files, 2 percent were settled and 34 percent were discontinued.

The Commissioner carried out a detailed mapping of the investigation process. This allowed her to determine areas of inefficiency and identify best practices. The "lean process" will be implemented on a pilot basis for incoming complaints in 2015–2016. The Commissioner's goal

is to provide better, timelier service, and greater transparency and predictability for complainants and institutions.

A leading access to information regime. In March 2015, the Commissioner published a special report to Parliament on modernizing the Access to Information Act. She also completed two systemic investigations. One was on the impact of inter-institution consultations on the timeliness of responses to requests. The second was on interference with requests. The Commissioner made recommendations to the President of the Treasury Board for system-wide improvements in these areas. The Commissioner hosted, along with the Privacy Commissioner, a conference for federal, provincial and territorial access to information and privacy commissioners.

Looking ahead, the Commissioner seeks to be a leader in the area of transparency and an agent of change for access. She will support and assist parliamentarians should they decide to modernize the Act after the fall 2015 election.

An exceptional workplace. In 2014–2015, the OIC adapted its talent management program to meet the requirements of the Treasury Board Directive on Performance Management. As a learning organization, the OIC will enhance this program in 2015–2016 by developing a formal training strategy to ensure that employees have the required skills they need and the opportunities to grow in order to meet their goals and those of the organization.

Internal Services

Description

Internal Services are groups of related activities and resources that are administered to support the needs of programs and other corporate obligations of an organization. These groups are Management and Oversight Services, Communications Services, Human Resources Management Services, Financial Management Services, Information Management Services, Information Technology (IT) Services, Real Property Services, Materiel Services, Acquisition Services, and Travel and Other Administrative Services. Internal Services include only those activities and resources that apply across an organization and not those provided to a specific program.

Budgetary Financial Resources (dollars)

2014–15 Main Estimates	Planned Spending	Total Authorities	Actual Spending (authorities used)	2014–15 Difference (actual minus planned)
\$2,576,221	\$2,576,221	\$2,739,376	\$2,618,339	\$42,118

Human Resources (FTEs)

2014–15 Planned	Actual	2014–15 Difference (actual minus planned)	
23	23	0	

Performance Analysis and Lessons Learned

The Corporate Services team continued to ensure sound stewardship and governance for the organization. The external Audit and Evaluation Committee provided important guidance throughout the year.

Early in 2014–2015, the information technology group launched the legal component of the OIC's case management system. The legal component interfaces with its investigative counterpart to facilitate reporting and sharing of information between lawyers and investigators as they work together on investigations, particular those that result in litigation.

To remain within its funding envelope, the OIC pursued opportunities to share services with other organizations. These allow the OIC to take advantage of expertise it does not have inhouse, reduce risk, make efficient use of resources and provide better services.

Three IT-related shared services projects are ongoing: migrating to a new human resources information system (MyGCHR), participating in the pay modernization project and adopting a new financial system that will be shared with the Office of the Privacy Commissioner and hosted by the Canadian Human Rights Tribunal.

Within available budgets, the Commissioner continued to provide training and development opportunities to staff. In 2014–2015, the OIC signed a memorandum of understanding with Elections Canada and three other organizations to establish a shared approach to internal training and set up a common training calendar.

In 2015–2016, the OIC will also pursue shared services opportunities related to information technology security.

Section III: Supplementary Information

Financial Statements Highlights

Condensed Statement of Operations (unaudited) For the Year Ended March 31, 2015

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Financial Information	2014–15 Planned Results	2014–15 Actual	Actual	(2014–15 actual minus 2014–15	Difference (2014–15 actual minus 2013–14 actual)
Total expenses	13,126,688	13,340,328	15,240,038	213,640	(1,899,710)
Total revenues	_	_	-	-	_
Net cost of operations before government funding and transfers	13,126,688	13,340,328	15,240,038	213,640	(1,899,710)

The OIC's total expenses for 2014–2015 decreased by \$1.9 million from 2013–2014. This was primarily due to the one-time costs associated with the office relocation in 2013–2014.

Condensed Statement of Financial Position (unaudited) As at March 31, 2015 (dollars)

Financial Information	2014–15	2013–14	Difference (2014–15 minus 2013–14)
Total net liabilities	1,609,564	1,922,784	(313,220)
Total net financial assets	738,182	1,042,257	(304,075)
Departmental net debt	871,382	880,527	(9,145)
Total non-financial assets	2,142,098	2,412,001	(269,903)
Departmental net financial position	1,270,716	1,531,474	(260,758)

The OIC's total non-financial assets for 2014–2015 decreased by \$269,903 from 2013–2014, primarily due to the decrease in the value of the assets acquired for the office relocation in 2013– 2014.

Financial Statements

The OIC website contains the organization's most recent audited financial statements, Statement of Management Responsibility Including Internal Control over Financial Reporting, and the corresponding annex on the development and assessment of the OIC's system of internal controls 9

Supplementary Information Tables

The supplementary information tables listed in the 2014–15 Departmental Performance Report are available on the OIC website.¹⁰

Internal Audits and Evaluations

Tax Expenditures and Evaluations

The tax system can be used to achieve public policy objectives through the application of special measures such as low tax rates, exemptions, deductions, deferrals and credits. The Department of Finance Canada publishes cost estimates and projections for these measures annually in the Tax Expenditures and Evaluations publication. 11 The tax measures presented in the Tax Expenditures and Evaluations publication are the responsibility of the Minister of Finance.

Section IV: Organizational Contact Information

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Appendix: Definitions

appropriation (crédit): Any authority of Parliament to pay money out of the Consolidated Revenue Fund

budgetary expenditures (*dépenses budgétaires*): Includes operating and capital expenditures; transfer payments to other levels of government, organizations or individuals; and payments to Crown corporations.

Departmental Performance Report (rapport ministériel sur le rendement): Reports on an appropriated organization's actual accomplishments against the plans, priorities and expected results set out in the corresponding Report on Plans and Priorities. These reports are tabled in Parliament in the fall.

full-time equivalent (équivalent temps plein): Is a measure of the extent to which an employee represents a full person-year charge against a departmental budget. Full-time equivalents are calculated as a ratio of assigned hours of work to scheduled hours of work. Scheduled hours of work are set out in collective agreements.

Government of Canada outcomes (résultats du gouvernement du Canada): A set of 16 high-level objectives defined for the government as a whole, grouped in four spending areas: economic affairs, social affairs, international affairs and government affairs.

Management, Resources and Results Structure (Structure de la gestion, des ressources et des résultats): A comprehensive framework that consists of an organization's inventory of programs, resources, results, performance indicators and governance information. Programs and results are depicted in their hierarchical relationship to each other and to the Strategic Outcome(s) to which they contribute. The Management, Resources and Results Structure is developed from the Program Alignment Architecture.

non-budgetary expenditures (dépenses non budgétaires): Includes net outlays and receipts related to loans, investments and advances, which change the composition of the financial assets of the Government of Canada.

performance (rendement): What an organization did with its resources to achieve its results, how well those results compare to what the organization intended to achieve and how well lessons learned have been identified

performance indicator (indicateur de rendement): A qualitative or quantitative means of measuring an output or outcome, with the intention of gauging the performance of an organization, program, policy or initiative respecting expected results.

performance reporting (*production de rapports sur le rendement*): The process of communicating evidence-based performance information. Performance reporting supports decision making, accountability and transparency.

planned spending (*dépenses prévues*): For Reports on Plans and Priorities (RPPs) and Departmental Performance Reports (DPRs), planned spending refers to those amounts that receive Treasury Board approval by February 1. Therefore, planned spending may include amounts incremental to planned expenditures presented in the Main Estimates.

A department is expected to be aware of the authorities that it has sought and received. The determination of planned spending is a departmental responsibility, and departments must be able to defend the expenditure and accrual numbers presented in their RPPs and DPRs.

plan (*plan*): The articulation of strategic choices, which provides information on how an organization intends to achieve its priorities and associated results. Generally a plan will explain the logic behind the strategies chosen and tend to focus on actions that lead up to the expected result

priorities (*priorité*): Plans or projects that an organization has chosen to focus and report on during the planning period. Priorities represent the things that are most important or what must be done first to support the achievement of the desired Strategic Outcome(s).

program (*programme*): A group of related resource inputs and activities that are managed to meet specific needs and to achieve intended results and that are treated as a budgetary unit.

Program Alignment Architecture (*architecture d'alignement des programmes*): A structured inventory of an organization's programs depicting the hierarchical relationship between programs and the Strategic Outcome(s) to which they contribute.

Report on Plans and Priorities (*rapport sur les plans et les priorités*): Provides information on the plans and expected performance of appropriated organizations over a three-year period. These reports are tabled in Parliament each spring.

result (*résultat*): An external consequence attributed, in part, to an organization, policy, program or initiative. Results are not within the control of a single organization, policy, program or initiative; instead they are within the area of the organization's influence.

statutory expenditures (*dépenses législatives*): Expenditures that Parliament has approved through legislation other than appropriation acts. The legislation sets out the purpose of the expenditures and the terms and conditions under which they may be made.

Strategic Outcome (résultat stratégique): A long-term and enduring benefit to Canadians that is linked to the organization's mandate, vision and core functions.

sunset program (programme temporisé): A time-limited program that does not have an ongoing funding and policy authority. When the program is set to expire, a decision must be made whether to continue the program. In the case of a renewal, the decision specifies the scope, funding level and duration.

target (cible): A measurable performance or success level that an organization, program or initiative plans to achieve within a specified time period. Targets can be either quantitative or qualitative.

voted expenditures (dépenses votées): Expenditures that Parliament approves annually through an Appropriation Act. The Vote wording becomes the governing conditions under which these expenditures may be made.

whole-of-government framework (cadre pangouvernemental): Maps the financial contributions of federal organizations receiving appropriations by aligning their Programs to a set of 16 government-wide, high-level outcome areas, grouped under four spending areas.

Endnotes

- 1. Access to information Act: http://laws-lois.justice.gc.ca/eng/acts/a-1/
- 2. Office of the Information Commissioner, *Strategic Plan 2011–2014*: http://www.oic-ci.gc.ca/eng/abu-ans_cor-inf-inf-cor-stategic-planning-plan-strategique_2011-2014.aspx
- 3. Office of the Information Commissioner, *Striking the Right Balance for Transparency*: http://www.oic-ci.gc.ca/eng/rapport-de-modernisation-modernization-report.aspx
- 4. Office of the Information Commissioner, *Observations on the health of the access system 2012–13*, http://www.oic-ci.gc.ca/eng/observations-sur-la-sante-du-systeme-d-acces-2012-2013_observations-on-the-health-of-the-access-system-2012-2013.aspx
- 5. Whole-of-government framework: http://www.tbs-sct.gc.ca/ppg-cpr/frame-cadre-eng.aspx
- 6. Public Accounts of Canada 2015: http://www.tpsgc-pwgsc.gc.ca/recgen/cpc-pac/index-eng.html
- 7. Office of the Information Commissioner, *Striking the Right Balance for Transparency*: http://www.oic-ci.gc.ca/eng/rapport-de-modernisation-modernization-report.aspx
- 8. Office of the Information Commissioner, Annual Report 2014–2015: http://www.oic-ci.gc.ca/eng/rp-pr ar-ra.aspx
- 9. Office of the Information Commissioner, 2014–2015 financial statements: http://www.oic-ci.gc.ca/eng/abu-ans_cor-inf-inf-cor_oag-report-rapport-bvg.aspx
- 10. Office of the Information Commissioner: http://www.oic-ci.gc.ca/eng/abu-ans_cor-inf-inf-cor_int-aud-ver-int_dpr.aspx
- 11. Government of Canada Tax Expenditures, http://www.fin.gc.ca/purl/taxexp-eng.asp