



Annual Report on the Administration of the *Privacy Act*

**Canadian Museum for Human Rights
2024-25**

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1. Introduction

The Canadian Museum for Human Rights (CMHR) is pleased to provide its annual report on the administration of the *Privacy Act* for the fiscal year 2024-25, as required under section 72 of the Act.

The *Privacy Act* governs the collection, use and disclosure of personal information by government institutions and protects an individual's right to privacy. The CMHR's practices with respect to personal information are governed by its Privacy Policy. Moreover, this annual report will be submitted and tabled to Parliament.

On February 11, 2008, the Government of Canada introduced legislation in Parliament to create the CMHR. The *Act to Amend the Museums Act* received the Royal Assent on March 13, 2008. The legislation came into force on August 10, 2008, and the Government appointed the Museum's first Board of Trustees on August 26, 2008.

The *Museums Act* establishes the mandate for the CMHR as follows:

"...to explore the subject of human rights, with special but not exclusive reference to Canada, in order to enhance the public's understanding of human rights, to promote respect for others and to encourage reflection and dialogue."

The Museum's public policy role is expressed in the preamble of the *Museums Act* which states each national museum:

- a) *"...plays an essential role, individually and together with other museums and like institutions, in preserving and promoting the heritage of Canada and all its peoples throughout Canada and abroad, and in contributing to the collective memory and sense of identity of all Canadians; and*
- b) *is a source of inspiration, research, learning and entertainment that belongs to all Canadians and provides, in both official languages, a service that is essential to Canadian culture and available to all."*

The CMHR is governed by a Board of Trustees consisting of up to eleven members who are appointed by the Minister of Canadian Identity and Culture and Minister responsible for Official Languages with the approval of the Governor in Council. The Board is responsible for executing the CMHR's mission and providing strategic direction to and oversight of the activities of the CMHR. The Director is the

Chief Executive Officer (CEO) of the CMHR and, under the direction of the Board, has control and management of the work and staff of the Museum. The Board of Trustees appoints the CEO of the Museum, with the approval of the Governor in Council.

The Museum did not have any non-operational (“paper”) subsidiaries during this reporting period.

2. Organizational Structure

During the reporting period, the Access to Information and Privacy (ATIP) Secretariat was located within the People, Culture and Growth Division and reported to the Vice- President, People, Culture and Growth. The ATIP Secretariat was comprised of the ATIP Coordinator, the ATIP Officer, and the Administrative Coordinator.

In August 2024, the Museum filled the position of Manager of Organizational Reporting and Compliance, who also held the position of ATIP Coordinator. The ATIP Coordinator is responsible for administering the *Privacy Act* within the CMHR with a mandate to act on behalf of the CEO in ensuring compliance with legislation, regulations, and government policy and to create directives and standards in all matters relating to the Act.

The ATIP Officer, who also held the position of Policy and Compliance Specialist, plays a lead role in the administration of the *Privacy Act* by processing Privacy requests and providing professional advice and training to CMHR employees.

Moreover, in February 2025, the Museum hired a permanent full-time Administrative Coordinator to support ATIP, Parliamentary Questions and compliance reporting processes. This has been a significant addition to this small department.

The CMHR also engages with an external consultant who provides additional support with ATIP requests, Privacy inquiries and the review of records. This support is needed mostly when the ATIP Secretariat is working on several ATIP requests at the same time, while also fulfilling other duties, such as Parliamentary Inquiries and policy-related tasks.

The CMHR was not party to any service agreements under section 73.1 of the *Privacy Act* during the reporting period.

3. Delegation Order

Pursuant to Section 73 of the *Privacy Act*, the Museum has delegated authority to the following people for the 2024-25 fiscal year,

1. Access to Information and Privacy (ATIP) Coordinator
2. Vice-President, People, Culture and Growth Division

to exercise or perform all powers, duties, and functions of the CEO under the *Privacy Act* insofar as they may be exercised or performed in relation to the CMHR. The delegation order for 2024-25 is appended.



CANADIAN MUSEUM FOR
HUMAN RIGHTS
MUSÉE CANADIEN POUR LES
DROITS DE LA PERSONNE

ACCESS TO INFORMATION ACT AND PRIVACY ACT DELEGATION ORDER

The Chief Executive Officer of the Canadian Museum for Human Rights, pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby designates the person holding the position set out in the schedule hereto, or the person occupying on an acting basis that position, to exercise the powers, duties and functions of the Chief Executive Officer as the head of the Canadian Museum for Human Rights, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Access to Information and Privacy Coordinator	Full authority	Full authority
Vice President, People, Culture and Growth	Full authority	Full authority

Dated, at the City of Winnipeg, this July 18, 2024



Chief Executive Officer

4. Performance (2024-25) Requests

The CMHR did not receive requests under the *Privacy Act* in the fiscal year 2024-25. There are no active requests or complaints outstanding from the previous reporting periods.

The chart below illustrates the number of requests received in the last 10 fiscal years.

<i>Fiscal Year</i>	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
<i>Privacy Requests</i>	0	0	0	0	0	0	1	0	1	0

Consultations

No privacy consultations were received during the reporting period.

5. Training and Awareness

The ATIP Secretariat continued its training efforts during this fiscal year and provided a comprehensive training session on *the Access to Information Act* and the *Privacy Act* for the Finance and Information Services teams. Moreover, they have continued building their training capacity by reconfiguring their training material to make it more suitable and crafted for each one of CMHR's team's needs. In addition, the ATIP Secretariat is working with the recruitment team to include a summarized version of this training, as part of the onboarding process. In addition, they have provided their legal expertise in Privacy matters to members of the staff and the executive team at the Museum, on an as-needed basis.

Furthermore, the members of the ATIP Secretariat are constantly receiving orientations and attending online training sessions, such as the Access to Information and Privacy Communities Development Office (APCDO) InfoBlitz sessions and the APCDO Deep Dive sessions. Also, all the staff working at the ATIP Secretariat are active members of the APCDO - ATIP Professionals GCCollab closed group.

6. Policies, Guidelines and Procedures

This fiscal year the Museum continued the systematic review of all the current policies, guidelines and procedures at the CMHR. The Museum conducted Discovery Sessions with representatives of its Leadership and Management groups, as well as staff. These had the purpose of identifying the key elements that this review should take into consideration, when evaluating the current policies, including the Information Management Policy. This policy review process will continue through 2026-27.

7. Initiatives and Projects to Improve Privacy

As part of this review, the Museum worked collaboratively with the Information Technology department in the creation of the CMHR Generative Artificial Intelligence Policy. The main purpose

was to ensure that the guidelines and procedures listed within this policy followed the parameters established in the *Privacy Act* and the *Access to Information Act*.

8. Summary of Key Issues and Actions Taken on Complaints:

During the reporting period, the CMHR did not receive complaints and did not initiate or conclude any privacy-related investigations.

9. Material Privacy Breaches:

No material privacy breaches occurred during the reporting period.

10. Privacy Impact Assessments (PIA):

No Privacy Impact Assessments were completed during the reporting period.

11. Public Interest Disclosure:

There were no requests during the reporting period.

12. Monitoring Compliance

As part of the CMHR's ATIP review process, there is an ongoing examination of how the Museum may make available frequently requested types of information by means other than ATIP. As part of the review process initiated in this fiscal year, the Museum is evaluating how it might improve the assurance that appropriate privacy protections are included in contracts, agreements, and arrangements.

As part of the regular monitoring protocol, the ATIP Secretariat prepares quarterly update reports for the Museum's leadership team. These reports include all the Privacy requests that are being processed and the ones recently released.

Furthermore, the CMHR has developed a Legislative and Regulatory Compliance Report 2024-25, and it is shared with the Audit and Finance Committee at the Board of Trustees on a quarterly basis as of the fiscal year 2024-25.

Within this report, the ATIP Secretariat is responsible for the Information Management Section, which includes all the reports that are related to the *Access to Information Act* and *Privacy Act*.

Moreover, the Administrative Coordinator has been actively utilizing many tools available through Microsoft Suite to track all the timelines and status updates; as well as to document all decisions

and communications made with respect to each request.