



Annual Report on the *Access to Information Act*

For the period from April 1, 2021, to March 31, 2022

Public Sector Pension Investment
Board and its Wholly-Owned
Subsidiaries

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Introduction

The Public Sector Pension Investment Board and its Wholly-Owned Subsidiaries (collectively “PSP”) is pleased to present to Parliament its annual report on the administration of the *Access to Information Act* for fiscal year 2021–22 (April 1, 2021, to March 31, 2022).

The Public Sector Pension Investment Board (“PSP”) is a Canadian federal Crown Corporation with offices in Montréal, Québec and Ottawa, Ontario, as well as international offices operated by its wholly-owned subsidiaries in London (UK), New York (USA) and Hong Kong (Special Administrative Region). A copy of PSP relevant wholly-owned subsidiaries (as of March 31, 2022) can be found in **Appendix D**.

This report is prepared and tabled in accordance with the following:

- section 94 of the *Access to Information Act*, which requires that the head of every federal institution prepare and submit an annual report to Parliament on the administration of the act in the institution during the fiscal year.
- section 3.01 of the *Access to Information Act*, which enunciates that PSP is a parent Crown corporation for the purposes of the Act.

Purpose of the Access to Information Act

The purpose of the *Access to Information Act* is to enhance the accountability and transparency of federal institutions to promote an open and democratic society and to enable public debate on the conduct of those institutions. In furtherance of that purpose:

- Part 1 extends the present laws of Canada to provide a right of access to information in records under the control of a government institution in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific, and that decisions on the disclosure of government information should be reviewed independently of government.
- Part 2 sets out requirements for the proactive publication of information.

Mandate of the Public Sector Pension Investments Board

PSP manages the amounts transferred to it by the Government of Canada for the funding of benefits earned from April 1, 2000, by members of the public sector pension plans of the federal Public Service, the Canadian Forces, the Royal Canadian Mounted Police and, since March 1, 2007, the Reserve Force. In accordance with the Public Sector Pension Investment Board Act, PSP Investments’ statutory mandate is to:

- Manage amounts that are transferred to it in the best interests of the contributors and beneficiaries under the acts related to the Plans.
 - Invest its assets with a view to achieving a maximum rate of return, without undue risk of loss, having regard to the funding, policies and requirements of the Plans and the ability of the Plans to meet their financial obligations.
-

Delegation order

Pursuant to subsection 95(1) of the *Access to Information Act*, the President and CEO of the PSP, acting in his capacity of head of PSP, has delegated the full powers, duties, and functions for the administration of the *Access to Information Act* to the following PSP officials: the Senior Vice-President and Chief Legal Officer, the Access to Information and Privacy Coordinator, and the Access to Information and Privacy Analyst(s).

The delegation order was signed on June 21, 2019, and a copy can be found in **Appendix C**.

Organizational structure

The Access to Information and Privacy (ATIP) office is under the responsibility of the Legal Affairs Department.

The ATIP office is responsible for implementing and managing programs and services relating to PSP's administration of the *Access to Information Act* and the *Privacy Act*, as well as for providing advice to PSP employees as they fulfill their obligations under both acts.

The ATIP office is led by a Senior Director, who is supported by 3 employees who collectively share the responsibilities for the Intake, Operations, Policies and Procedures.

Team members work together closely to:

- process access to information and privacy requests.
- support sector officials on privacy-related matters.
- support proactive publication of information.
- develop training materials.

Section 96 of the *Access to Information Act* allows government institutions to provide services related to access to information to another government institution that is presided over by the same minister. In 2021–22, the PSP ATIP office did not provide any such services.

Part 1: Performance in Fiscal Year 2021–22

Statistical reports prepared by government institutions provide aggregate data on the application of the *Access to Information Act* and *Privacy Act* legislation. This information is made public annually in a Statistical Report that is included with the annual reports on access to information and privacy tabled in Parliament by each institution. PSP's statistical report on the *Access to Information Act* for 2021–22 is in **Appendix A**.

This year, institutions were asked to report on how the COVID-19 pandemic affected their capacity to receive requests and process records. The 2021–22 Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act* is in **Appendix B**.

The following sections contain highlights on PSP's performance in fiscal year 2021–22 in relation to its obligations under the *Access to Information Act* and analyses of the notable statistical data for this year compared with previous years.

Requests received and carried forward

In fiscal year 2021–22, PSP received a total of 7 new requests under the *Access to Information Act*. This represents a 16% increase from the 2020–21 total of 6.

The number of requests carried forward increased from 1 in 2020–21 to 4 in 2021–22. This increase was a result of the date some requests were received (March 2022).

Figure 1 shows how many access to information requests PSP received each year and how many were completed for 2018–19 to 2021–22.

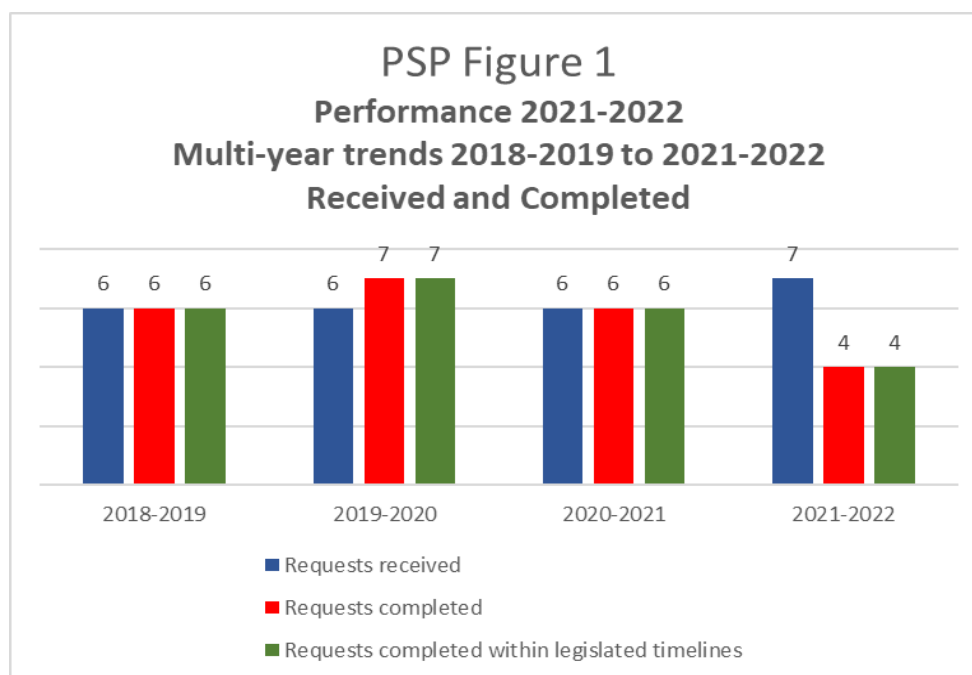
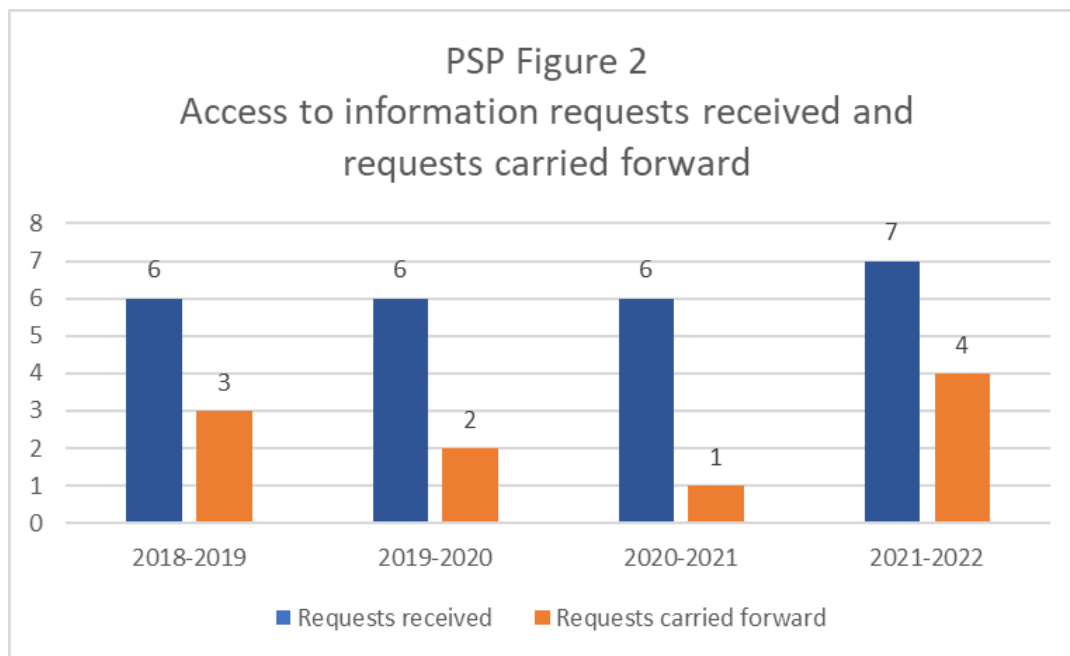


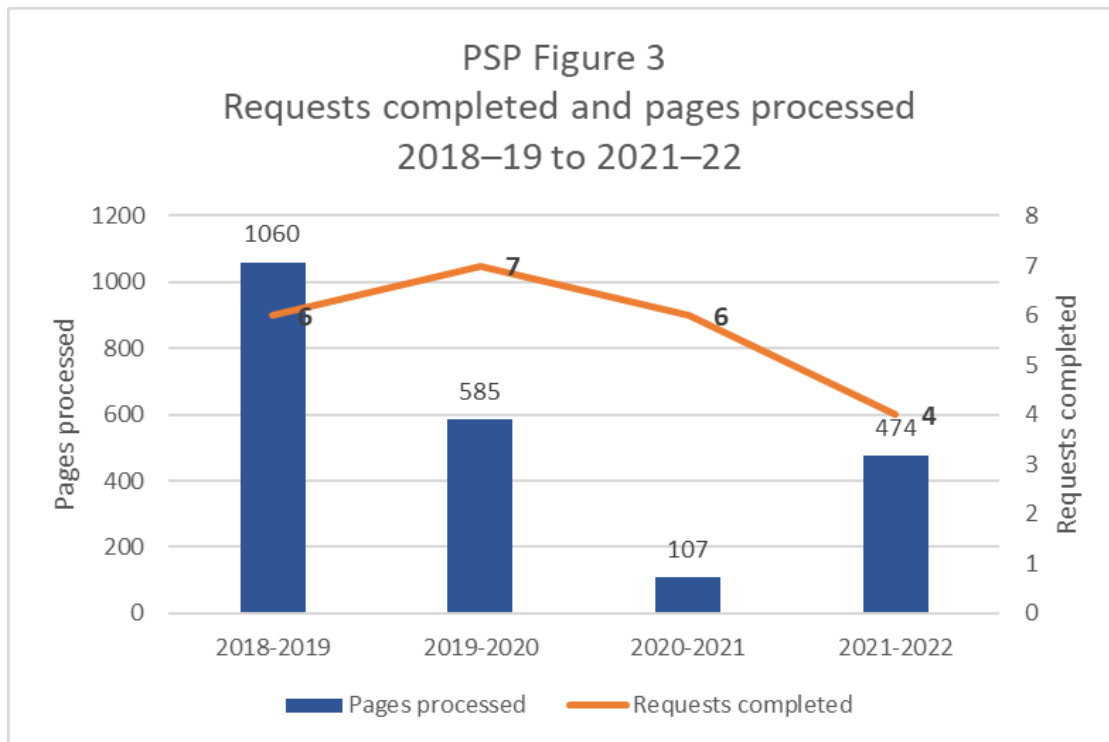
Figure 2 shows how many access to information requests PSP received each year and how many were carried forward for 2018–19 to 2021–22.



Requests completed and pages processed

PSP completed 4 requests in 2021–22, which represents 474 pages processed. More pages were processed this year than in the last fiscal year, even though requests completed decreased by 33% from last year to this year.

Figure 3 shows, for 2018–19 to 2021–22, the number of access to information requests PSP completed each year and the number of pages it processed for those requests.

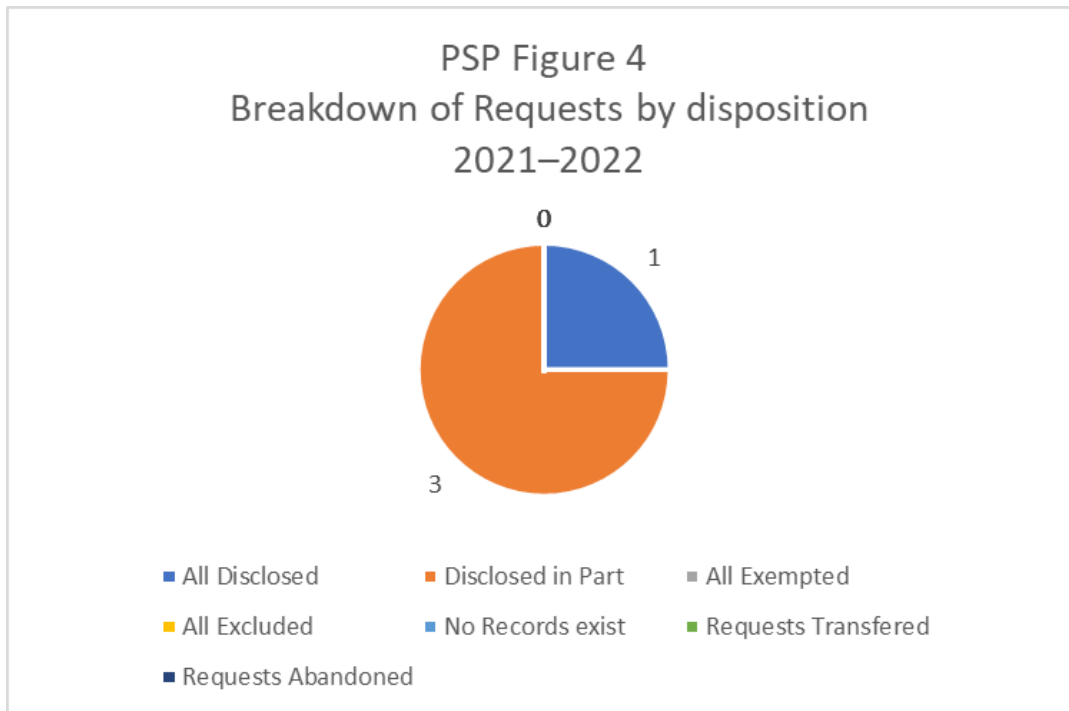


Disposition of requests and exemptions and exclusions applied to records

In 2021–22, there were no requests that were abandoned by the applicant and no requests for which PSP had no records.

For the requests where records were provided, for 1 of them, the records were fully disclosed to the requester without redactions; for 3 of them, the records were partially disclosed; and for none of them, the records were fully excluded.

Figure 4 shows the breakdown of requests by disposition for 2021–22.



Of the requests that fell within PSP’s mandate, a significant proportion of the records were only partially disclosed due to the nature of PSP’s business, which involves competitively sensitive information. If released, this information would reveal to PSP’s competitors recent changes in PSP’s asset mix and allow them to replicate PSP’s proprietary strategy at no cost, thereby granting them an unfair advantage.

The *Access to Information Act* exempts certain information from being disclosed. In fiscal year 2021–22, 3 records were subject to exemptions under the act and were therefore not fully disclosed because the records requested contained the following:

- financial information that belongs to, and has consistently been treated as confidential by, PSP (3) (paragraph 18.1(1)(c) of the act).
- third party information (paragraphs 20(1)(b) and (c) of the act).
- personal information (1) (subsection 19(1) of the act).

The *Access to Information Act* does not apply to or excludes Cabinet confidences and confidences of the Privy Council (section 69 of the act). Further, records that are publicly available (for example, government publications and records in libraries or museums) are also excluded (subsection 68(a) of the act). In 2021–22, no records requested were subject to exclusions.

PSP’s ATIP office also receives enquiries from the public about how to obtain information under the *Access to Information Act* or the *Privacy Act*, and about where to send their requests. PSP redirects some of these enquiries to other federal government institutions, and occasionally, to provincial Freedom of Information and Privacy offices. They are not counted as requests for the purposes of this report.

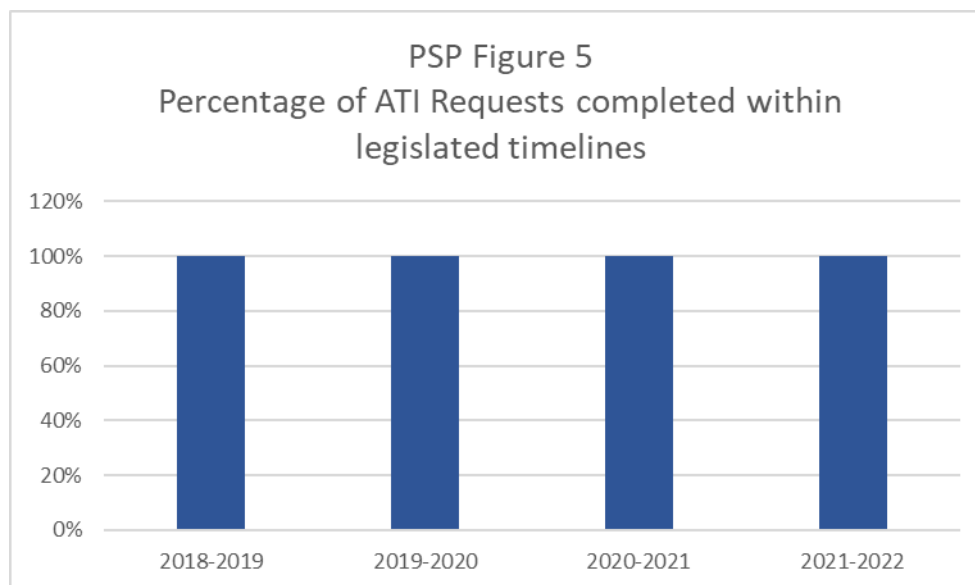
On-time compliance rate, completion times and extensions

On-time compliance rate

The on-time compliance rate is the percentage of requests responded to within their legislative timelines, including requests for which the institution invoked legislative extensions.

In fiscal year 2021–22, PSP's ATIP office achieved an 100% on-time compliance rate despite the significant challenges associated with the COVID-19 pandemic. Several factors contributed to this rate, including the quick resumption of the office's operations after adapting to the shift to teleworking, the issuing of weekly statistical reports on performance, strong case file management, and regular information sessions with PSP officials.

Figure 5 shows the percentage of requests completed within legislated timelines, 2018-19 to 2021-22.



Extensions

The legislation sets timelines for responding to access to information requests and allows for extensions in the following cases: when complying with the timeline would result in interference with operations, when a consultation with other institutions is required, or when a third-party consultation is required.

In fiscal year 2021–22, PSP sought extensions in 2 instances (50%) to consult with another government institution, and third parties. Each file could qualify for multiple extensions.

Figure 6 shows the average number of pages processed per completed request, percentage of completed requests that required an extension, and the on-time compliance rate, for fiscal years 2018-19 to 2021-22.

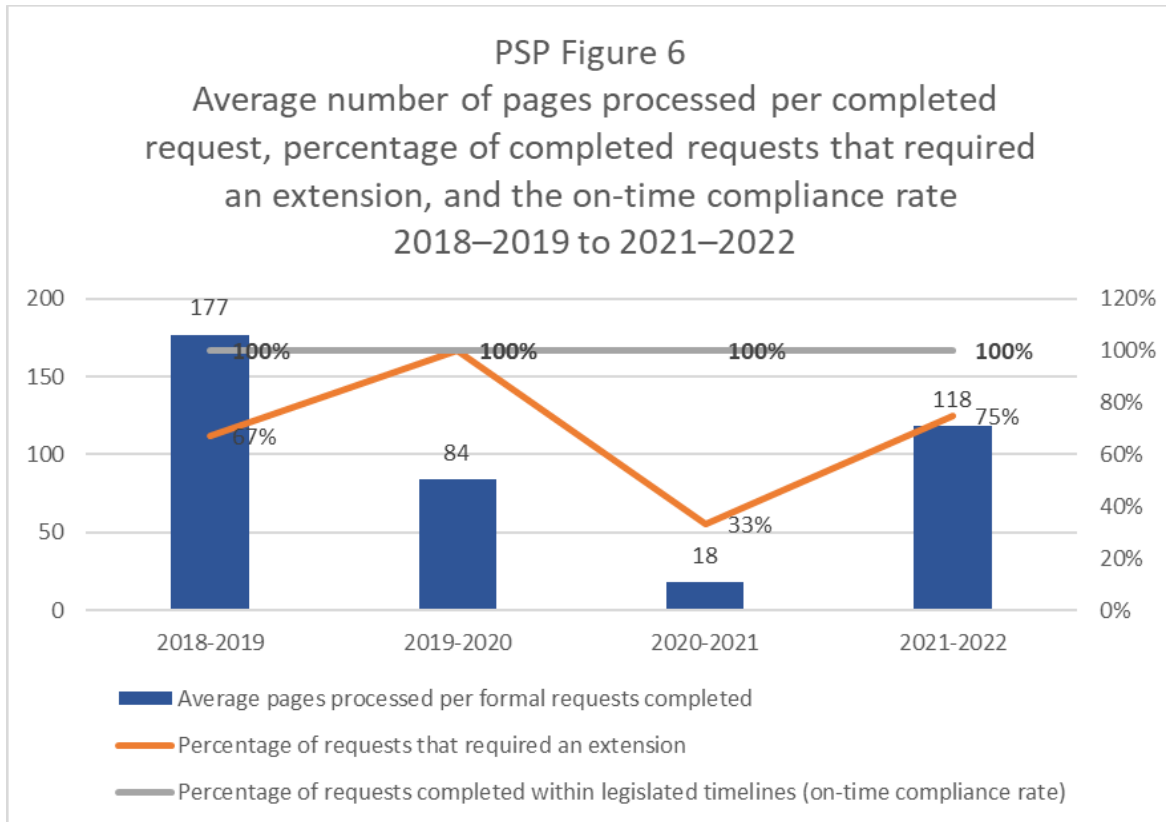
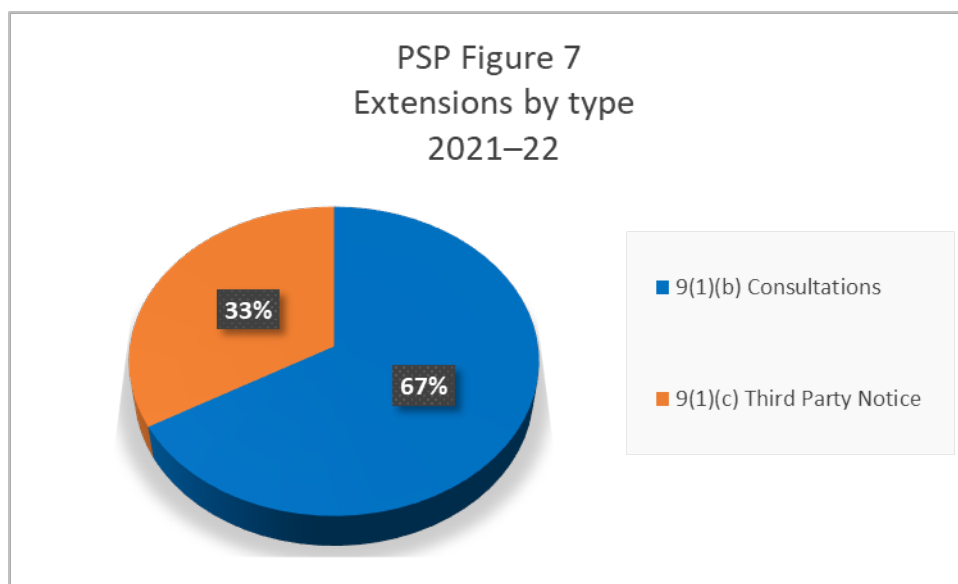


Figure 7 shows the distribution of the different types of extensions.

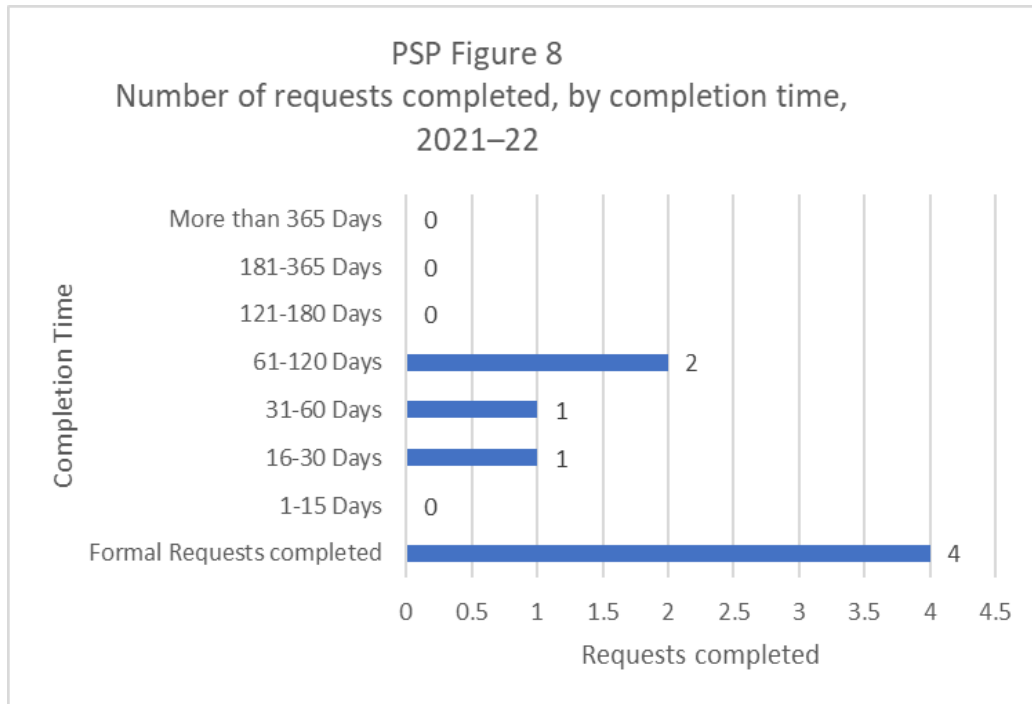


Completion times

Of the 4 requests closed this year, 25% were closed within 30 days.

No requests took over one year to close.

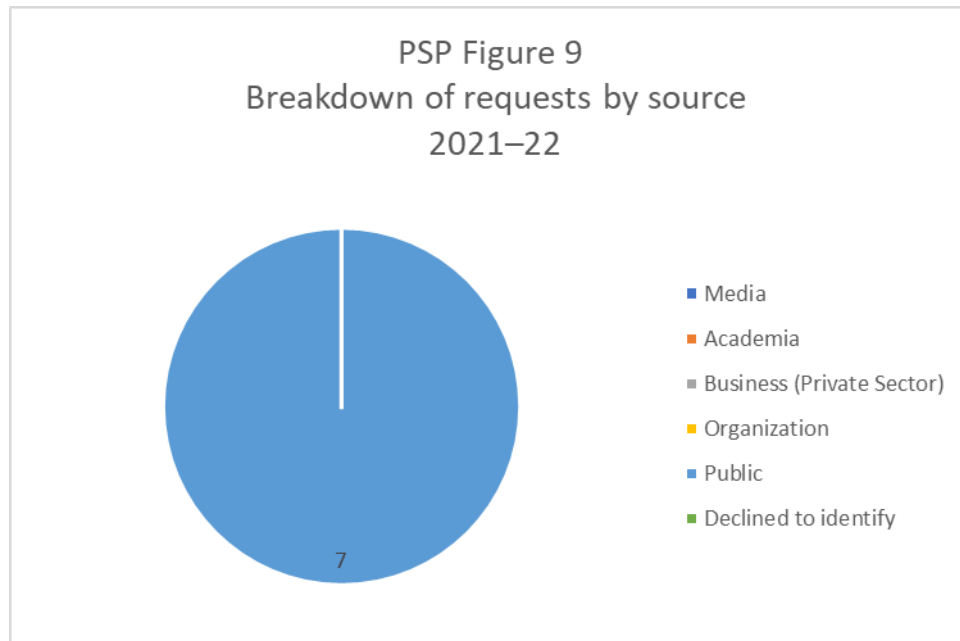
Figure 8 shows the number of requests completed within each completion time.



Sources of requests

Of the 7 requests received in fiscal year 2021–22, all came from the public. No requests were submitted by the media, businesses, academia, organizations, or individuals who declined to identify themselves (52).

Figure 9 shows the distribution of requests received from each source type.



Format of information released

The ATIP office has continued to strive to increase the number of responses it provides in electronic format. In fiscal year 2021–22, it released information in electronic format for all requests closed. It provided no paper responses this year, mainly because of the changes made to procedures to maintain operations during the COVID-19 pandemic and to adapt to the new digital environment.

Informal requests

As part of fulfilling its objective of providing Canadians with relevant information on an informal and timely basis, and in the spirit of transparency and open government, PSP processes informal requests for information. These requests are not subject to the *Access to Information Act*. In fiscal year 2021–22, the ATIP office responded to 8 informal requests totalling 472 pages.

Consultations

PSP receives consultation requests from other federal institutions relating to *Access to Information* requests involving PSP records or issues. In fiscal year 2021–22, PSP received 3 consultation requests, and completed another one which was outstanding from the previous reporting period. This year's requests represented a total of 265 pages of information.

Impact of COVID-19 pandemic on ATIP office operations

In response to the measures implemented to minimize the effects of the COVID-19 pandemic (for example, having all employees work from home), PSP activated its business continuity plan (BCP) on March 16, 2020. Under the BCP, all employees were granted access to PSP's virtual private network (VPN).

From April 1, 2021, to March 31, 2022, legislated ATIP services were provided through PSP VPN access, under the BCP. Since all PSP ATIP employees had full access to the VPN, normal ATIP activities were conducted. Further, some PSP colleagues have also been going to the office regularly to perform certain tasks needed to ensure program continuity (for example, to pick up regular mail).

The PSP ATIP office had to update its procedures to reflect the realities of a new digital environment while at the same time continuing its operations despite the challenges of the pandemic. It modernized its processes to ensure that requests were processed efficiently and within legislative deadlines.

The PSP ATIP office fully complied with the COVID-19 ATIP Implementation notice issued by the Treasury Board of Canada Secretariat's (TBS) Information and Privacy Policy Division.

Training and awareness

In fiscal year 2021–22, the PSP ATIP office continued to expand its outreach activities and provided training sessions to all new PSP employees through the PSP on-boarding program.

In addition, to mark Data Privacy Day, the PSP ATIP office promoted the importance of sound privacy management practices and the shared responsibility for safeguarding personal information in day-to-day activities. The PSP ATIP office published a PSP video which outlined the importance of sound privacy practices.

Policies, guidelines, procedures, and initiatives

Digital processes

With most PSP employees were working from home because of the COVID-19 pandemic, the PSP ATIP office developed alternate procedures and guidelines to make it easier for employees to retrieve documents digitally in response to ATIP requests.

Part 2 of the *Access to Information Act*: proactive publication of information

The PSP ATIP office proactively publishes information for the:

- PSP Chair and Board Members.
- PSP President and Chief Executive Officer.
- PSP Senior Vice President and Chief Legal Officer.
- PSP Senior Vice President and Chief Financial and Risk Officer.
- PSP Senior Vice President, Chief Human Resources and Global Communications Officer.
- PSP Senior Vice President and Chief Technology and Data Officer.
- PSP Senior Vice President and Global Head of Credit and Private Equity Investments.
- PSP Senior Vice President and Chief Investment Officer.
- PSP Senior Vice President and Global Head of Capital Markets.
- PSP Senior Vice President and Global Head of Real Estate Assets Investments.

The PSP ATIP office supports the publication of certain requirements for proactive publication of information under Part 2 of the *Access to Information Act*. This includes creating procedural guides on proactive publication, coordinating with the web team, and reviewing all documents before publication.

The following information is reviewed by the PSP ATIP office as part of proactive publication.

Travel and hospitality (sections 82 and 83)

In fiscal year 2021–22, there were 86 disclosures relating to travel and hospitality.

Reports tabled in Parliament (section 84)

In 2021–22, there were 3 disclosures relating to Reports tabled in Parliament.

Information about programs and information holdings

Pursuant to section 5 of the *Access to Information Act*, the Public Sector Pension Investment Board publishes an inventory of its information holdings, as well as relevant details about personal information under its control. The primary purpose of this inventory is to assist individuals in exercising their rights under the *Access to Information Act*. It also supports the federal government's commitment to facilitate access to information on its activities, since it is available to the public on the Internet, free of charge.

A description of PSP's functions, programs, activities, and related information holdings can be found on PSP's website (<https://www.investpsp.com/en/>)

In addition to completing the annual update of its inventory of information holdings, PSP is realigning all content in the publication to bring it into line with the fiscal year 2021–22 Annual Report which enunciates its Results Framework.

Complaints

Complaints received

Requesters can file a complaint with the Office of the Information Commissioner of Canada (OIC) if they are not satisfied with the processing of their requests. In fiscal year 2021–22, PSP was not notified of any complaints received by the OIC.

Table 1: Complaints received, by type, 2021–22

Type of complaint	Numbers of complaints
Time limits	0
Delay: deemed refusal	0
Refusal: exemptions	0
Refusal: exclusion	0
Refusal: missing records	0
Miscellaneous	0
Total	0

Complaints closed

The OIC issued 2 findings indicating that it ceased to investigate in 2 complaint investigations filed previously against the PSP.

Table 2: Complaints closed by the Office of Information Commissioner in 2021–22

Disposition of complaint	Numbers of findings	Type of complaint
Not well-founded	0	No records: 0
Discontinued	2	Exemptions or exclusions: 2 No records: 0
Well-founded	0	Delay: 0 No records: 0
Total	2	2

Court cases

There have been no court cases against PSP in relation to the *Access to Information Act* or the *Privacy Act* since 2004.

Monitoring compliance

The PSP ATIP office produces a variety of regular and ad hoc reports to monitor PSP's compliance with the *Access to Information Act* and *Privacy Act* through the quarterly review of key performance indicators.

Fees and costs

Fees

Applications fees refer to fees collected, waived, and refunded that relate to all requests received, active or closed during the current reporting period. Application fees were received through TBS' ATIP Online Request Service ("AORS"). As the TBS AORS does not report for these fees, please note that the fees were sent to the Receiver General on behalf of the PSP. With respect to the \$5.00 application fee collected by the TBS AORS for making a request under the *Access to Information Act*, the total revenue collected was \$25.00. In addition, through the TBS AORS, \$10.00 in application fees was waived as provided for in paragraph 7(1)(a) of the *Access to Information Regulations*.

Costs

In 2021–22, PSP's total cost for administering the *Access to Information Act* was \$149,477. The PSP ATIP office incurred \$58,876 in salary costs and \$90,601 in professional services contracts costs.

These costs do not include resources expended by PSP's program areas to meet the requirements of the Act.

Appendix A: Statistical Report on the *Access to Information Act*



Government of Canada
Gouvernement du Canada

Statistical Report on the *Access to Information Act*

Name of institution: PSPIB and its Wholly-Owned Subsidiaries

Reporting period: 4/1/2021 to 3/31/2022

Section 1: Requests Under the *Access to Information Act*

1.1 Number of requests

		Number of Requests
Received during reporting period		7
Outstanding from previous reporting periods		1
• Outstanding from previous reporting period	1	
• Outstanding from more than one reporting period	0	
Total		8
Closed during reporting period		4
Carried over to next reporting period		4
• Carried over within legislated timeline	4	
• Carried over beyond legislated timeline	0	

1.2 Sources of requests

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

1.3 Channels of requests

Source	Number of Requests
Online	5
E-mail	0
Mail	2
In person	0
Phone	0
Fax	0
Total	7

Section 2: Informal Requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		8
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	

• Outstanding from more than one reporting period	0
Total	8
Closed during reporting period	8
Carried over to next reporting period	0

2.2 Channels of informal requests

Source	Number of Requests
Online	8
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	8

2.3 Completion time of informal requests

Completion Time							Total
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	
7	1	0	0	0	0	0	8

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
3	3	1	469	0	0	0	0	0	0

2.5 Pages re-released informally

Less Than 100 Pages Re-released		100-500 Pages Re-released		501-1000 Pages Re-released		1001-5000 Pages Re-released		More Than 5000 Pages Re-released	
Number of Requests	Pages Re-released	Number of Requests	Pages Re-released	Number of Requests	Pages Re-released	Number of Requests	Pages Re-released	Number of Requests	Pages Re-released
3	173	1	469	0	0	0	0	0	0

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

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

Section 4: Requests Closed During the Reporting Period

4.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	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	
All disclosed	0	0	1	0	0	0	0	1
Disclosed in part	0	1	0	2	0	0	0	3
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 transferred	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
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0
Total	0	1	1	2	0	0	0	4

4.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	0	16(2)	0	18(a)	0	20.1	0
13(1)(b)	0	16(2)(a)	0	18(b)	2	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	0	18(d)	0	21(1)(a)	0
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	1
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	0
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	3	21(1)(d)	0
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	0
15(1)	0	16.1(1)(d)	0	19(1)	1	22.1(1)	0
15(1) - I.A.*	0	16.2(1)	0	20(1)(a)	0	23	1
15(1) - Def.*	0	16.3	0	20(1)(b)	2	23.1	0
15(1) - S.A.*	0	16.4(1)(a)	0	20(1)(b.1)	0	24(1)	0
16(1)(a)(i)	0	16.4(1)(b)	0	20(1)(c)	2	26	0
16(1)(a)(ii)	0	16.5	0	20(1)(d)	0		
16(1)(a)(iii)	0	16.6	0				
16(1)(b)	0	17	0				
16(1)(c)	0						
16(1)(d)	0						

* I.A.: International Affairs Def.: Defence of Canada S.A.: Subversive Activities

4.3 Exclusions

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

4.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	4	0	1	0	0

4.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
474	474	4

4.5.2 Relevant pages processed per request disposition for paper and e-record formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	1	1	0	0	0	0	0	0	0	0
Disclosed in part	2	4	1	469	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
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0	0	0
Total	3	5	1	469	0	0	0	0	0	0

4.5.3 Relevant minutes processed and disclosed for audio formats

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

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

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

4.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
108	108	1

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

Disposition	Less Than 60 Minutes Processed		60 - 120 Minutes Processed		More than 120 Minutes Processed	
	Number of Requests	Minutes Processed	Number of Requests	Minutes Processed	Number of Requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	1	108	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0
Total	0	0	1	108	0	0

4.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Other	Total
All disclosed	0	0	0	0
Disclosed in part	2	1	0	3
All exempted	0	0	0	0
All excluded	0	0	0	0
Request abandoned	0	0	0	0
Neither confirmed nor denied	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0
Total	2	1	0	3

4.6 Closed requests

4.6.1 Requests closed within legislated timelines

Number of requests closed within legislated timelines	4
Percentage of requests closed within legislated timelines (%)	100

4.7 Deemed refusals

4.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	Interference with operations/ Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

4.7.2 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 timeline 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

4.8 Requests for translation

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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

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

5.2 Length of extensions

Length of Extensions	9(1)(a) Interference With Operations/ Workload	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
30 days or less	1	0	1	2
31 to 60 days	0	0	0	0
61 to 120 days	0	0	1	0
121 to 180 days	0	0	0	0
181 to 365 days	0	0	0	0
365 days or more	0	0	0	0
Total	1	0	2	2

Section 6: Fees

Fee Type	Fee Collected		Fee Waived		Fee Refunded	
	Number of Requests	Amount	Number of Requests	Amount	Number of Requests	Amount
Application	5	\$25.00	2	\$10.00	0	\$0.00
Other fees	0	\$0.00	0	\$0.00	0	\$0.00
Total	5	\$25.00	2	\$10.00	0	\$0.00

Section 7: Consultations Received From Other Institutions and Organizations**7.1 Consultations received from other Government of Canada institutions and other organizations**

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	3	264	0	0
Outstanding from the previous reporting period	1	1	0	0
Total	4	265	0	0
Closed during the reporting period	4	265	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	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	
Disclose entirely	0	1	0	0	0	0	0	1
Disclose in part	1	2	0	0	0	0	0	3
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	1	3	0	0	0	0	0	4

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	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	
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 9: Investigations and Reports of finding

9.1 Investigations

Section 32 Notice of intention to investigate	Subsection 30(5) Ceased to investigate	Section 35 Formal Representations
0	2	0

9.2 Investigations and Reports of finding

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

Section 10: Court Action

10.1 Court actions on complaints

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

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

Section 44 - under paragraph 28(1)(b)
0

Section 11: Resources Related to the *Access to Information Act*

11.1 Allocated Costs

Expenditures		Amount
Salaries		\$58,876
Overtime		\$0
Goods and Services		\$90,601
• Professional services contracts	\$90,601	
• Other	\$0	
Total		\$149,477

11.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	0.523
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.207
Students	0.000
Total	0.730

Note: Enter values to three decimal places.

Appendix B: Supplemental Statistical Report on the Access to Information Act and Privacy Act

In addition to completing the forms for the statistical reports on the *Access to Information Act* and the *Privacy Act* for 2021 to 2022, institutions were asked to complete this supplemental report regarding capacity to receive requests and capacity to process records.

Name of institution: Public Sector Pension Investment Board and its wholly-owned subsidiaries

Reporting period: 2021-04-01 to 2022-03-31

Section 1: Capacity to Receive Requests

	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

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

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

Appendix C: Delegation Order

**Public Sector Pension Investment Board
("PSPIB")
and its Wholly-Owned Subsidiaries**

Delegation Order ("Order")

(section 95(1), *Access to Information Act*,

R.S.C. 1985, c. A-1, as amended and section 73, *Privacy Act*, R.S.C. 1985, c. P-21, as amended)

1. This Order may be cited as the "PSPIB and wholly-owned subsidiaries of PSPIB Head of Institution Delegation Order pursuant to the *Access to Information Act* and *Privacy Act*".
2. Pursuant to Section 95(1) of the *Access to Information Act* and Section 73 of the *Privacy Act*, the undersigned, acting in his capacity of head of PSPIB, its Wholly-Owned Subsidiaries in existence as of the date of this Order as well as those which may hereafter be established, PSP Investments USA LLC, PSP Investments Holding Europe Ltd and PSP Investments Asia Limited (the "Government Institutions"), hereby designate the persons holding the positions set out in the schedule set forth in the attached Section 4 below, or the persons occupying on an acting basis those positions, to exercise his powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite each position. This Delegation Order replaces all previous delegation orders for the Government Institutions.
3. For the purposes of this Order, "Wholly-Owned Subsidiaries" shall include all Canadian wholly-owned subsidiaries of PSPIB which are corporations, with the exception of those subsidiaries with their own heads.

This Delegation Order has been made in Montreal and is effective starting on the 21st day of June 2019.

DocuSigned by:

38038A4AA7034A3

Neil Cunningham
President and CEO

PSP-1.legal.3823946-4

4. **Schedule**

PSPIB
Delegation of Authority
Under the *Access to Information Act* and the *Privacy Act*

Position/Title	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Senior Vice-President and Chief Legal Officer	Full authority	Full authority
Access to Information and Privacy Coordinator	Full authority	Full authority
Access to Information and Privacy Analyst(s)	Full authority	Full authority

Appendix D: List of Relevant Wholly-Owned Subsidiaries

	Name of Subsidiary	French Version in Corporate Name	French Business Name
1	3Net Indy Holdings Inc.	N/A	Gestion 3Net Indy
2	3Net Indy Investments Inc.	N/A	Investissements 3Net Indy
3	7986386 CANADA INC.	N/A	N/A
4	8599963 Canada Inc.	N/A	N/A
5	Argentia Private Investments Inc.	N/A	Argentia Investissements Privés
6	AviAlliance Canada Inc.	N/A	N/A
7	Belle Bay Private Investments Inc.	N/A	Investissements Privés Belle Bay
8	Blue & Gold Private Investments Inc.	N/A	Blue & Gold Investissements Privés
9	Datura Private Investments Inc.	N/A	Datura Investissements Privés
10	Downsview Metro Devco Inc.	N/A	Gestion Downsview Métro Devco
11	Galvaude Private Investments Inc.	N/A	Investissements Privés Galvaude
12	Indo-Infra Inc.	N/A	Gestion Indo-Infra
13	Infra H2O GP Partners Inc.	N/A	Infra H2O GP Partenaires
14	Infra H2O LP Partners Inc.	N/A	Infra H2O LP Partenaires
15	Infra TM Investments Inc.	N/A	Investissements Infra TM
16	Infra-PSP Canada Inc.	N/A	N/A
17	Infra-PSP Credit Inc.	N/A	Infra-PSP Crédit
18	Infra-PSP ECEF Inc.	N/A	N/A
19	Infra-PSP Partners Inc.	N/A	Infra-PSP Associés
20	Ivory Private Investments Inc.	N/A	Ivory Investissements Privés
21	Kings Island Private Investments Inc.	N/A	Kings Island Investissements Privés
22	Northern Fjord Holdings Inc.	N/A	Gestion Northern Fjord
23	Port-aux-Choix Private Investments Inc.	N/A	Port-aux-Choix Investissements Privés

24	Potton Holdings Inc.	N/A	Gestion Potton
25	PSP Capital Inc.	N/A	N/A
26	PSP FINCO Inc.	N/A	N/A
27	PSP FINCO LATAM INC.	N/A	Gestion PSP Finco Latam
28	PSP H2O FL GP INC.	N/A	Commandité PSP H2O FL
29	PSP Investments Asia Limited	N/A	N/A
30	PSP Investments Canada Inc./Investissements PSP Canada Inc.	Investissements PSP Canada Inc.	N/A
31	PSP Investments Holding Europe Ltd	N/A	N/A
32	PSP Investments USA LLC	N/A	N/A
33	PSP Public Credit I Inc.	N/A	PSP Crédit Public I
34	PSP Public Credit Opportunities Inc.	N/A	Opportunités de Crédit Public PSP
35	PSP Public Markets Inc.	N/A	PSP Marchés Publics
36	PSPIB Bromont Investments Inc.	N/A	Investissements PSPIB Bromont
37	PSPIB CLUSTER INVESTMENTS INC.	N/A	Investissements PSPIB Cluster
38	PSPIB Deep South Inc.	N/A	Gestion PSPIB Deep South
39	PSPIB DevCol Inc.	N/A	Gestion PSPIB DevCol
40	PSPIB Emerald Inc.	N/A	Gestion PSPIB Emerald
41	PSPIB G.P. Finance Inc.	N/A	PSPIB Commandité Finance
42	PSPIB G.P. Inc.	N/A	PSPIB Commandité
43	PSPIB G.P. Partners Inc.	N/A	PSPIB Commandité Associés
44	PSPIB GIPP D1 Inc.	N/A	N/A
45	PSPIB Golden Range Cattle II Inc.	N/A	Gestion PSPIB Golden Range Cattle II
46	PSPIB Golden Range Cattle Inc.	N/A	Gestion PSPIB Golden Range Cattle
47	PSPIB Homes Inc.	N/A	Gestion PSPIB Homes
48	PSPIB LUNAR INVESTMENTS INC.	N/A	Investissements PSPIB Lunar
49	PSPIB MEXICO GP INC.	N/A	Commandité PSPIB Mexico
50	PSPIB Michigan G.P. Inc.	N/A	PSPIB Michigan Commandité
51	PSPIB Orchid Inc.	N/A	Gestion PSPIB Orchid
52	PSPIB Paisas Inc.	N/A	Gestion PSPIB Paisas
53	PSPIB Pennsylvania Investments	N/A	Investissements PSPIB

	Inc.		Pennsylvania
54	PSPIB Realty International Inc. / PSPIB Immobilier International Inc.	PSPIB Immobilier International Inc.	N/A
55	PSPIB Stanley Investments Inc.	N/A	N/A
56	PSPIB Steam Investments Inc.	N/A	Investissements PSPIB Steam
57	PSPIB THOR INVESTMENTS INC.	N/A	Investissements PSPIB Thor
58	PSPIB Unitas Investments II Inc.	N/A	N/A
59	PSPIB Unitas Investments Inc.	N/A	N/A
60	PSPIB WEXFORD INVESTMENTS INC.	N/A	Investissements PSPIB Wexford
61	PSPIB-AI Investments Inc.	N/A	Investissements PSPIB-AI
62	PSPIB-Andes Inc.	N/A	Gestion PSPIB-Andes
63	PSPIB-ARE CANADA INC.	N/A	Gestion PSPIB-ARE CANADA
64	PSPIB-ARE SERVICES INC.	N/A	SERVICES PSPIB-ARE
65	PSPIB-Condor Inc.	N/A	N/A
66	PSPIB-Eldorado Inc.	N/A	Gestion PSPIB-Eldorado
67	PSPIB-ILS INVESTMENTS INC.	N/A	Investissements PSPIB-ILS
68	PSPIB-LSF Inc.	N/A	N/A
69	PSPIB-RE FINANCE II INC.	N/A	Gestions PSPIB-RE Finance II
70	PSPIB-RE Finance Inc.	N/A	N/A
71	PSPIB-RE Finance Partners II Inc.	N/A	PSPIB-RE Finance Associés II
72	PSPIB-RE Finance Partners Inc.	N/A	PSPIB-RE Finance Associés
73	PSPIB-RE MANCHESTER INC.	N/A	Gestion PSPIB-RE Manchester
74	PSPIB-RE Partners II Inc.	N/A	PSPIB-RE Associés II
75	PSPIB-RE Partners Inc.	N/A	PSPIB-RE Associés
76	PSPIB-RE UK Inc.	N/A	Gestion PSPIB-RE UK
77	PSPIB-SDL Inc.	N/A	N/A
78	PSPIB-Star Inc.	N/A	PSPIB-Étoile
79	Red Isle Private Investments Inc.	N/A	Red Isle Investissements Privés
80	Revera Inc.	N/A	N/A
81	Sooke Investments Inc.	N/A	Investissements Sooke

82	Trinity Bay Private Investments Inc.	N/A	Placements Privés Trinity Bay
83	Vertuous Energy Canada Inc.	N/A	Énergie Vertuous Canada
84	VOP Investments Inc.	N/A	Investissements VOP

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Cat. No.

ISBN