Access to Information Act

Annual Report 2024-2025

ASIA PACIFIC FOUNDATION OF CANADA I FONDATION ASIE PACIFIQUE DU CANADA



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Access to Information Act

A1. Introduction

The purpose of the *Access to Information Act* is to enhance the accountability and transparency of federal institutions in order 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; and Part 2 sets out requirements for the proactive publication of information.

Section 94 of the *Access to Information Act* requires that the head of federal government institutions prepare and table in Parliament an annual report of the administration of the Act for each fiscal year.

This annual report summarizes the activities of the Asia Pacific Foundation of Canada relating to the *Access to Information Act* between April 1, 2024, and March 31, 2025 and is prepared in accordance with section 94 of the Act.

A2. Organizational Structure

The Asia Pacific Foundation of Canada, created by an Act of Parliament in 1984, is a not-for-profit organization focused on Canada's relations with Asia. Our mission is to be Canada's catalyst for engagement with Asia and Asia's bridge to Canada. APF Canada is dedicated to strengthening ties between Canada and Asia with a focus on expanding economic relations through trade, investment, and innovation; promoting Canada's expertise in offering solutions to Asia's climate change, energy, food security and natural resource management challenges; building Asia skills and competencies among Canadians, including young Canadians; and, improving Canadians' general understanding of Asia and its growing global influence.

The Foundation is based in Vancouver, B.C. and has 37 employees. The Foundation does not have any non-operational ("paper") subsidiaries to report on for this reporting period. Additional information on the Foundation and its activities can be found at www.asiapacific.ca.

The Foundation reports to the Minister of Foreign Affairs. The head of the Asia Pacific Foundation is the President and Chief Executive Officer. Operational responsibility for the implementation of the *Access to Information Act* at the Asia Pacific Foundation of Canada has been delegated to the Access to Information and Privacy (ATIP) Coordinator. The ATIP Coordinator is the sole member of staff responsible for ATIP issues, including the collection and publishing of required proactive publication material. In certain cases where further expertise is

required to properly fulfill institutional requirements under ATIP, APF Canada employs one ATIP Consultant.

The Foundation did not participate in any service agreements under section 96 of the *Access to Information Act* during the reporting period.

For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see the section "**Proactive Publication under Part 2 of the ATIA**", below.

A3. Delegation Order

The ATIP Coordinator is responsible for the development and implementation of policies and procedures to manage the Foundation's compliance with the *Access to Information Act*. The ATIP Coordinator is delegated full authority regarding the administration of, and compliance with, the *Access to Information Act*. A copy of the Delegation Order is attached at the end of the report.

A4. Performance under Part 1 of the Access to Information Act, 2024–2025

The Foundation did not receive any formal requests under the *Access to Information Act* during the fiscal year.

The Foundation received one consultation request from a Government of Canada Institution. The request was completed within 0-15 days.

A5. Training and Awareness

During the 2024-25 fiscal year the role and responsibilities of the ATIP Coordinator did not change. The ATIP Coordinator remained the same individual who occupied the position at the end of fiscal year 2023-24 and did not undertake any further ATIP related training.

The ATIP Coordinator organized 2 briefing sessions on the *Access to Information Act* for new staff during the reporting period. We plan to conduct the appropriate training sessions for staff this Fall 2025 and further integrate ATIP training as part of the onboarding process for new staff.

The ATIP office has its ATIP information page on the Foundation's Intranet. It provides all employees with resources on the legislation, and policies and procedures relating to the *Access to Information Act*.

A6. Policies, Guidelines, and Procedures

The Foundation has a comprehensive policies and procedures manual that provides specific procedures, standards and guidelines on processing requests under the *Access to Information Act*. The manual is available to all staff on the Foundation's Intranet. The Foundation did not implement any new or revised access to information-related policies, guidelines or procedures during the reporting period.

The Foundation has in place internal deadlines for completing documents related to legislative proactive publication requirements to meet the publication timeline.

A7. Initiatives and Projects to Improve Access to Information

The Foundation's ATIP office continues using the ATIP Online Management Tool website to receive and process requests under the *Access to Information Act*.

The Foundation is a government institution as defined in section 3 of the *Access to Information Act* and for the purposes of Part 2 of the *Access to Information Act*. The Asia Pacific Foundation of Canada is not listed in Schedules I, I.1, II, or IV of the *Financial Administration Act*. Though not required, the Foundation publishes information on the organization's contracts over \$10,000 to make more government information available to Canadians without an ATI request.

A8. Summary of Key Issues and Actions Taken on Complaints

No complaints were received during the reporting period.

A9. Proactive Publication under Part 2 of the ATIA

| Legislative Requirement | Sectio n of ATIA | Publication Timeline | Does requiremen t apply to your institution? (Y/N) | Internal group(s) or positions(s) responsible for fulfilling requirement | % of proactive publication requirement s published within legislated timelines* | Link to web page where published** |
|------------------------------|------------------------|---|--|---|---|--|
| Apply to all Gov | ernment | Institutions as defin | ed in section 3 | of the Access to | o Information A | ct |
| Travel Expenses | 82 | Within 30 days after the end of the month of reimbursement | Y | Executives | 25% | https://www.a siapacific.ca/a bout-us/travel- and-hospitality |
| Hospitality Expenses | 83 | Within 30 days after the end of the month of reimbursement | Y | Executives | 25% | https://www.a siapacific.ca/a bout-us/travel- and-hospitality |
| Reports tabled in Parliament | 84 | Within 30 days after tabling | Y | Executives | 100% | https://www.a siapacific.ca/a nnual-reports |
| Apply to govern | ment ent | ities or Department | s, agencies, an | d other bodies s | subject to the A | ct and listed in |
| | | e Financial Adminis | _ | | | |
| Contracts over \$10,000 | 86 | Q1-3: Within 30 days after the quarter | N | | | |

| | | Q4: Within 60 | | | | |
|---|-------|-----------------------|----------|---------|------------------|---------------|
| | | days after the | | | | |
| | | quarter | | | | |
| Grants & | 87 | Within 30 days | N | | | |
| Contributions | | after the quarter | | | | |
| over \$25,000 | | , | | | | |
| Packages of | 88(a) | Within 120 days | N | | | |
| briefing | | after | | | | |
| materials | | appointment | | | | |
| prepared for | | | | | | |
| new or | | | | | | |
| incoming | | | | | | |
| deputy heads | | | | | | |
| or equivalent | | | | | | |
| Titles and | 88(b) | Within 30 days | N | | | |
| reference | ` ′ | after the end of | | | | |
| numbers of | | the month | | | | |
| memoranda | | received | | | | |
| prepared for a | | | | | | |
| deputy head or | | | | | | |
| equivalent, | | | | | | |
| that is received | | | | | | |
| by their office | | | | | | |
| Packages of | 88(c) | Within 120 days | N | | | |
| briefing | | after appearance | | | | |
| materials | | | | | | |
| prepared for a | | | | | | |
| deputy head or | | | | | | |
| equivalent's | | | | | | |
| appearance | | | | | | |
| before a | | | | | | |
| committee of | | | | | | |
| Parliament | | | | | | |
| | | stitutions that are d | • | | | |
| | - | rtions of the core pu | | | Schedule IV to t | hat Act (i.e. |
| _ | | for which Treasury E | 1 | ployer) | | |
| Reclassificatio | 85 | Within 30 days | N | | | |
| n of positions | | after the quarter | | | | |
| Apply to Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office) | | | | | | |
| Packages of | 74(a) | Within 120 days | N | | | |
| briefing | (-, | after | | | | |
| materials | | appointment | | | | |
| | 1 | 1-1 | <u>I</u> | l . | l . | I |

| prepared by a | | | | | |
|------------------------|--------|--|----|--|--|
| government | | | | | |
| institution for | | | | | |
| new or | | | | | |
| incoming | | | | | |
| ministers | | | | | |
| Titles and | 74(b) | Within 30 days | N | | |
| reference | | after the end of | | | |
| numbers of | | the month | | | |
| memoranda | | received | | | |
| prepared by a | | | | | |
| government | | | | | |
| institution for | | | | | |
| the minister, | | | | | |
| that is received | | | | | |
| by their office | | | | | |
| Package of | 74(c) | Within 30 days | N | | |
| question | / 1(0) | after last sitting | | | |
| period notes | | day of the House | | | |
| prepared by a | | of Common in | | | |
| government | | June and | | | |
| institution for | | December | | | |
| the minister | | December | | | |
| and in use on | | | | | |
| | | | | | |
| the last sitting | | | | | |
| day of the House of | | | | | |
| Commons in | | | | | |
| | | | | | |
| June and | | | | | |
| December | 74/4\ | \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\ | N. | | |
| Packages of | 74(d) | Within 120 days | N | | |
| briefing | | after appearance | | | |
| materials | | | | | |
| prepared by a | | | | | |
| government | | | | | |
| institution for | | | | | |
| a minister's | | | | | |
| appearance | | | | | |
| before a | | | | | |
| committee of | | | | | |
| Parliament | | | | | |
| Travel | 75 | Within 30 days | N | | |
| Expenses | | after the end of | | | |

| | | the month of | | | |
|----------------|----|------------------|---|--|--|
| | | reimbursement | | | |
| Hospitality | 76 | Within 30 days | N | | |
| Expenses | | after the end of | | | |
| | | the month of | | | |
| | | reimbursement | | | |
| Contracts over | 77 | Q1-3: Within 30 | N | | |
| \$10,000 | | days after the | | | |
| | | quarter | | | |
| | | Q4: Within 60 | | | |
| | | days after the | | | |
| | | quarter | | | |
| Ministers' | 78 | Within 120 days | N | | |
| Offices | | after the fiscal | | | |
| Expenses | | year | | | |
| Note: This | | | | | |
| consolidated | | | | | |
| report is | | | | | |
| currently | | | | | |
| published by | | | | | |
| TBS on behalf | | | | | |
| of all | | | | | |
| institutions. | | | | | |

^{*}When counting proactive publication requirements count monthly or quarterly reports as a single publication.

The Foundation will strengthen measures in fiscal year 2024-25 to ensure that travel and hospitality requirements are proactively published within the legislated timeline.

A10. Monitoring Compliance

Formal *ATI Act* Requests

When an ATIP request is acknowledged by the ATIP Coordinator, the nature of the request is shared with the President & CEO, as well as with relevant staff members if required to fulfill the request. The status of the request is updated weekly or as needed during internal meetings until the request is closed.

Proactive Disclosure

Proactively published information under Part 2 of the Act is prepared by the staff members or their delegate and reviewed by Management before being published. The Foundation has in place internal deadlines for completing documents related to legislative proactive publication requirements to meet the publication timeline. All final fiscal materials are audited by a third party and approved by the Board of Directors at fiscal year-end for inclusion in the Foundation's

^{**}i.e., specific page where that information is located on open.canada.ca or the institution's website

Annual Report submitted to the Minister of Foreign Affairs and published on the Foundation's website.

External Agreements

Agreements between the Foundation and external parties include various clauses pertaining to confidentiality and privacy. All agreements of the Foundation are construed in accordance with the laws of British Columbia, Ontario, and Canada, as applicable.

The use and reasonings of collection of personal information are communicated when the Foundation requests such information. Relevant resources, including the ATIP Online Management Tool, are also shared publicly here: https://www.asiapacific.ca/about-us/copyright#3.

Asia Pacific Foundation of Canada Fondation Asie Pacifique du Canada

DELEGATION OF AUTHORITY

DÉLÉGATION DE POUVOIRS

ACCESS TO INFORMATION ACT AND PRIVACY ACT

LOI SUR L'ACCÈS À L'INFORMATION ET LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

I, the undersigned, President, pursuant to Subsection 95(1) of the *Access to Information Act* and subsection 73(1) of the *Privacy Act*, hereby authorize those officers and employees of the Foundation occupying the positions identified within the attached schedule to exercise signing authorities or perform any of the President and CEO's powers, duties or functions specified therein.

Je, soussigné, président, autorise par la présente les cadres et les employés de la Fondation qui occupent les postes indiqués dans l'annexe ci-jointe à exercer les pouvoirs de signature ou à exercer les pouvoirs, les fonctions ou les obligations du président qui y sont précisés, conformément au paragraphe 95 (1) de la *Loi sur l'accès à l'information* et au paragraphe 73 (1) de la *Loi sur la protection des renseignements personnels*.

Dated at Vancouver this 8th day of September, 2021.

Fait à Vancouver, en ce 8^e de septembre 2021.

Jeff Nankivell

President and CEO / Président et chef de la direction

Delegation of Authority Under the Access to Information Act

| Provision | Task/Function | Position / Title | | | | |
|-----------|---|---------------------|-------|-------|--|--|
| | | ATIP Coordinator | TITLE | TITLE | | |
| 4(2.1) | Responsibility of government institutions | х | | | | |
| 7(a) | Notice when access requested | х | | | | |
| 7(b) | Giving access to record | х | | | | |
| 8(1) | Transfer of request to another government institution | х | | | | |
| 9 | Extension of time limits | х | | | | |
| 11(2) | Waiving of fees | х | | | | |
| 12(2)(b) | Language of access | х | | | | |
| 12(3)(b) | Access in an alternative format | х | | | | |
| 13 | Exemption - Information obtained in confidence | х | | | | |
| 14 | Exemption - Federal-provincial affairs | Х | | | | |
| 15 | Exemption - International affairs and defense | х | | | | |
| 16 | Exemption - Law enforcement and investigations | х | | | | |
| 16.5 | Exemption - Public Servants Disclosure Protection Act | х | | | | |
| 16.6 | Exemption - Secretariat of National Security and Intelligence Committee of Parliamentarians | х | | | | |
| 17 | Exemption - Safety of individuals | х | | | | |
| 18 | Exemption - Economic interests of Canada | х | | | | |
| 18.1 | Exemption - Economic interest of the Canada Post Corporation, Export Development Canada, the Public Sector Pension Investment Board and VIA Rail Canada Inc. | X | | | | |
| 19 | Exemption - Personal information | х | | | | |
| 20 | Exemption - Third-party information | х | | | | |

Delegation of Authority Under the Access to Information Act

| Provision | Task/Function | Position / Title | | | | |
|-----------------------|--|---------------------|-------|-------|--|--|
| | | ATIP Coordinator | TITLE | TITLE | | |
| 21 | Exemption - Operations of Government | х | | | | |
| 22 | Exemption - Testing procedures, tests and audits | х | | | | |
| 22.1 | Exemption - Audit working papers and draft audit reports | х | | | | |
| 23 | Exemption - Solicitor-client privilege | Х | | | | |
| 23.1 | Exemption - Protected information — patents and trademarks | х | | | | |
| 24 | Exemption - Statutory prohibitions | Х | | | | |
| 25 | Severability | Х | | | | |
| 26 | Exception - Information to be published | Х | | | | |
| 27(1), (4) | Third-party notification | Х | | | | |
| 28(1)(b), (2), (4) | Third-party notification | Х | | | | |
| 29(1) | Where the Information Commissioner recommends disclosure | Х | | | | |
| 33 | Advising Information Commissioner of third- party involvement | Х | | | | |
| 35(2)(b) | Right to make representations | Х | | | | |
| 37(4) | Access to be given to complainant | Х | | | | |
| 41(2) | Apply for review by the Federal Court | Х | | | | |
| 43(2) | Notice to all interested parties of an application for review by the Federal Court | Х | | | | |
| 44(2) | Notice to requester of an application by the third party for a review by the Federal Court | х | | | | |
| 52(2)(b), (3) | Special rules for hearings | х | | | | |

Delegation of Authority Under the Access to Information Act

| Provision | Task/Function | Position / Title | | | |
|-----------|---|---------------------|-------|-------|--|
| | | ATIP Coordinator | TITLE | TITLE | |
| 74 | Publication of briefing materials | х | | | |
| 75 | Publication of travel expenses | х | | | |
| 76 | Publication of hospitality expenses | Х | | | |
| 77(1) | Publication of contracts over \$10,000 | х | | | |
| 77(2) | Publication of contracts of \$10,000 or less | х | | | |
| 77(3) | Publication of increase or decrease in value of contract | Х | | | |
| 78 | Publication of expense reports | х | | | |
| 82 | Publication of travel expenses | х | | | |
| 83 | Publication of hospitality expenses | х | | | |
| 84 | Report of activities of institution to Parliament | х | | | |
| 85 | Reclassification of positions | х | | | |
| 86(1) | Publication of contracts over \$10,000 | х | | | |
| 86(2) | Publication of contracts of \$10,000 or less | х | | | |
| 86(3) | Publication of increase or decrease in value of contract | Х | | | |
| 87(1) | Grants and contributions over \$25,000 | х | | | |
| 87(2) | Grants and contributions of \$25,000 or less | х | | | |
| 87(3) | Publication of increase or decrease in value of grant or contribution | Х | | | |
| 88 | Publication of briefing materials | х | | | |
| 94(1) | Annual report to Parliament | х | | | |
| 96(1) | Provision of services related to access to information | Х | | | |

Delegation of Authority Under the Access to Information Regulations

| Provision | Task/Function | Position / Title | | | |
|-----------|----------------------------------|---------------------|-------|-------|--|
| | | ATIP Coordinator | TITLE | TITLE | |
| 6(1) | Transfer of request | x | | | |
| 8 | Providing access to record(s) | х | | | |
| 8.1 | Limitations in respect of format | х | | | |

Privacy Act

Annual Report 2024-2025

ASIA PACIFIC FOUNDATION OF CANADA I FONDATION ASIE PACIFIQUE DU CANADA



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| Attachment: Delegation Order for the <i>Privacy Act</i> . | |

Privacy Act

B1. Introduction

The purpose of the *Privacy 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.

Section 72 of the *Privacy Act* requires that the head of federal government institutions prepares and tables in Parliament an annual report of the administration of the Act for each fiscal year.

This annual report summarizes the activities of the Asia Pacific Foundation of Canada relating to the *Privacy Act* between April 1, 2024, and March 31, 2025, and is prepared in accordance with section 72 of the Act.

B2. Organizational Structure

The Asia Pacific Foundation of Canada, created by an Act of Parliament in 1984, is a not-for-profit organization focused on Canada's relations with Asia. Our mission is to be Canada's catalyst for engagement with Asia and Asia's bridge to Canada. APF Canada is dedicated to strengthening ties between Canada and Asia with a focus on expanding economic relations through trade, investment, and innovation; promoting Canada's expertise in offering solutions to Asia's climate change, energy, food security and natural resource management challenges; building Asia skills and competencies among Canadians, including young Canadians; and, improving Canadians' general understanding of Asia and its growing global influence.

The Foundation is based in Vancouver, B.C. and has 37 employees. The Foundation does not have any non-operational ("paper") subsidiaries to report on for this reporting period. Additional information on the Foundation and its activities can be found at www.asiapacific.ca.

The Foundation reports to the Minister of Foreign Affairs. The head of the Asia Pacific Foundation is the President and Chief Executive Officer. Operational responsibility for the implementation of the Access to Information Act at the Asia Pacific Foundation of Canada has been delegated to the Access to Information and Privacy (ATIP) Coordinator. The ATIP Coordinator is the sole member of staff responsible for ATIP issues, including the collection and publishing of required proactive publication material. In certain cases where further expertise is required to properly fulfill institutional requirements under ATIP, APF Canada employs one ATIP Consultant.

The Foundation did not participate in any service agreements under section 73.1 of the *Privacy Act* during the reporting period.

B3. Delegation Order

The ATIP Coordinator is responsible for the development and implementation of policies and procedures to manage the Foundation's compliance with the *Privacy Act*. The ATIP Coordinator is delegated full authority regarding the administration of, and compliance with, the *Privacy Act*. A copy of the Delegation Order is attached at the end of the report.

B4. Performance 2024–2025

The Foundation received two requests under the *Privacy Act* during the reporting period. 0% of requests were responded to within legislated timelines, due to the complexities of the request and difficulties obtaining relevant information. Out of the three requests completed during the reporting period, one was completed within 31-60 days and two outstanding requests from the previous reporting cycle were completed within 181 to 365 days. 66% of completed requests did not produce relevant records. Records were "all disclosed" for 33% of completed requests, and 0% of completed requests produced records "disclosed in part".

There was 1 active request as of the last day of the reporting period, received in the fiscal year 2024-2025. The request is no longer within legislated timelines.

There were no active complaints as of the last day of the reporting period. The Foundation did not receive consultations from other institutions.

B5. Training and Awareness

During the 2024-25 fiscal year the role and responsibilities of the ATIP Coordinator did not change. The ATIP Coordinator remained the same individual who occupied the position at the end of fiscal year 2023-24 and did not undertake any further ATIP related training.

The ATIP Coordinator organized 2 briefing sessions on the *Privacy Act* for new staff during the reporting period. We plan to conduct the appropriate training sessions for staff this Fall 2025 and further integrate ATIP training as part of the onboarding process for new staff.

The ATIP office has its ATIP information page on the Foundation's Intranet. It provides all employees with resources on the legislation, and policies and procedures relating to the *Privacy Act*.

B6. Policies, Guidelines, and Procedures

The Foundation has a comprehensive policies and procedures manual which provides specific procedures, standards and guidelines on processing requests under the *Privacy Act*. The manual is available to all staff on the Foundation's Intranet. The Foundation's Privacy Policy can be found on the Foundation's website. The Foundation did not implement any new or revised privacy-related policies, guidelines or procedures during the reporting period.

B7. Initiatives and Projects to Improve Privacy

The Foundation's ATIP office continues using the ATIP Online Management Tool website to receive and process requests under the *Privacy Act*.

B8. Summary of Key Issues and Actions Taken on Complaints

During the reporting period, the Foundation received a complaint on the time taken to complete a formal request, and a "denial of access" complaint. Both complaints were made in relation to the same request.

The Foundation appreciates the gravity of complaints made related to ATIP requests. In this case, to properly resolve the request and the associated complaints, the Foundation was prompted to seek legal and ATIP counsel, which extended the time required to fully process this request. Upon receiving necessary legal and ATIP advice, the requested information was disclosed in full without exception. The Office of the Privacy Commissioner resolved the complaint through the Office's early resolution process.

B9. Material Privacy Breaches

No material privacy breaches were reported to the Office of the Privacy Commissioner and to Treasury Board of Canada Secretariat (Privacy and Responsible Data Division) during the reporting period.

B10. Privacy Impact Assessments

No PIAs were completed during the reporting period.

B11. Public Interest Disclosures

No disclosures were made pursuant to paragraph 8 (2)(m) of the *Privacy Act* during the reporting period.

B12. Monitoring Compliance

Formal *Privacy Act* Requests

When an ATIP request is acknowledged by the ATIP Coordinator, the nature of the request is shared with the President & CEO, as well as with relevant staff members if required to fulfill the request. The status of the request is updated weekly or as needed during internal meetings until the request is closed.

Personal and Other Sensitive Information

Agreements between the Foundation and external parties include various clauses pertaining to confidentiality and privacy. All agreements of the Foundation are construed in accordance with the laws of British Columbia, Ontario, and Canada, as applicable.

Banking information for contractors, grant recipients, and certain vendors may be collected by staff and submitted to the Accounting Department where required. The information is managed by the Accounting Department, using APF Canada's accounting system and a restricted internal storage folder. Similarly, the Foundation maintains an internal, secure and restricted-access database of contact information of key stakeholders.

The Foundation has measures to protect the personal information of external guests. Privacy notices are posted at all events where the Foundation employs a photographer and where the visual products may be used for future materials, such as social media posts, presentations, and reports.

Personal information may be collected for program participants where required. This generally includes name, contact information, some demographic information required for reporting purposes, program preferences, and dietary requirements. Information is collected through a secure platform and stored on the APF Canada servers in a protected folder with restricted access, available only to staff members who require the information to execute their roles and responsibilities.

Passports or government-issued ID may be collected to verify the legal name and identity of contractors and grant recipients, in accordance with the Foundation's Human Resources Department guidelines. The storage and handling of these identification documents follow the record-keeping practices established by Human Resources, as outlined below.

In the administration of its Human Resources programs and services, the Foundation adopts the following privacy protection measures to safeguard the personal information of its staff, applicants, and contractors:

- 1. Collection of Personal Information HR collects personal information solely for the purpose of managing human resources activities, including but not limited to recruitment, onboarding, payroll, benefits administration, performance management, occupational health and safety, and employee relations. The information collected is directly from the individual concerned wherever possible, and is limited to what is necessary for lawful, authorized purposes.
- 2. **Use and Disclosure of Personal Information** Personal information is used strictly for the purpose for which it was collected or for uses consistent with that purpose. Disclosures to third parties (e.g., payroll processors, benefits providers, employment lawyers) are limited to what is necessary.
- 3. Access Controls and Safeguards HR systems and files containing personal information are secured using multiple layers of protection, including password-protected databases, access-level permissions, and physical security measures (e.g., locked cabinets, secure servers). Only HR, Finance and Accounting and other authorized senior management with a demonstrated need-to-know have access to staff personal records.
- 4. **Retention and Secure Disposal** Personal information is retained only as long as necessary to fulfill the identified purpose or to meet legislative or contractual requirements. Secure disposal procedures, including digital wiping and shredding of physical documents, are in place and documented for all obsolete records containing personal data.

- 5. **Employee Access to Personal Information** Staff and former employees have the right to request access to their personal information held by the HR department. HR provides assistance to individuals who wish to verify the accuracy of their records or request corrections.
- 6. **Oversight and Continuous Improvement** HR policies and procedures are reviewed at least annually to reflect changes in legislation, emerging risks, and Foundation's needs.

The use and reasonings of the personal information collected are communicated when the Foundation requests such information. The Foundation's Privacy Policy is available here: https://www.asiapacific.ca/about-us/copyright#3.

Asia Pacific Foundation of Canada Fondation Asie Pacifique du Canada

DELEGATION OF AUTHORITY

DÉLÉGATION DE POUVOIRS

ACCESS TO INFORMATION ACT AND PRIVACY ACT

LOI SUR L'ACCÈS À L'INFORMATION ET LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

I, the undersigned, President, pursuant to Subsection 95(1) of the *Access to Information Act* and subsection 73(1) of the *Privacy Act*, hereby authorize those officers and employees of the Foundation occupying the positions identified within the attached schedule to exercise signing authorities or perform any of the President and CEO's powers, duties or functions specified therein.

Je, soussigné, président, autorise par la présente les cadres et les employés de la Fondation qui occupent les postes indiqués dans l'annexe ci-jointe à exercer les pouvoirs de signature ou à exercer les pouvoirs, les fonctions ou les obligations du président qui y sont précisés, conformément au paragraphe 95 (1) de la *Loi sur l'accès à l'information* et au paragraphe 73 (1) de la *Loi sur la protection des renseignements personnels*.

Dated at Vancouver this 8th day of September, 2021.

Fait à Vancouver, en ce 8^e de septembre 2021.

Jeff Nankivell

President and CEO / Président et chef de la direction

Delegation of Authority Under the *Privacy Act*

| Provision | Task/Function | Position / Title | | | | |
|-----------|--|---------------------|-------|-------|--|--|
| | | ATIP Coordinator | TITLE | TITLE | | |
| 8(2)(j) | Disclosure for research purposes | х | | | | |
| 8(2)(m) | Disclosure in the public interest or in the interest of the individual | х | | | | |
| 8(4) | Copies of requests under 8(2)(e) to be retained | х | | | | |
| 8(5) | Notice of disclosure under 8(2)(m) | Х | | | | |
| 9(1) | Record of disclosures to be retained | х | | | | |
| 9(4) | Consistent uses | х | | | | |
| 10 | Personal information to be included in personal information banks | х | | | | |
| 14 | Notice where access requested | х | | | | |
| 15 | Extension of time limits | х | | | | |
| 17(2)(b) | Language of access | х | | | | |
| 17(3)(b) | Access to personal information in alternative format | х | | | | |
| 18(2) | Exemption (exempt bank) - Disclosure may be refused | х | | | | |
| 19(1) | Exemption - Personal information obtained in confidence | х | | | | |
| 19(2) | Exemption - Where authorized to disclose | х | | | | |
| 20 | Exemption - Federal-provincial affairs | х | | | | |
| 21 | Exemption - International affairs and defense | Х | | | | |
| 22 | Exemption - Law enforcement and investigation | х | | | | |
| 22.3 | Exemption - Public Servants Disclosure Protection Act | х | | | | |
| 23 | Exemption - Security clearances | х | | | | |

Delegation of Authority Under the *Privacy Act*

| Provision | Task/Function | Position / Title | | | |
|-----------|---|---------------------|-------|-------|--|
| | | ATIP Coordinator | TITLE | TITLE | |
| 24 | Exemption - Individuals sentenced for an offence | х | | | |
| 25 | Exemption - Safety of individuals | х | | | |
| 26 | Exemption - Information about another individual | Х | | | |
| 27 | Exemption - Solicitor-client privilege | Х | | | |
| 28 | Exemption - Medical record | Х | | | |
| 31 | Notice of intention to investigate | Х | | | |
| 33(2) | Right to make representation | Х | | | |
| 35(1) | Findings and recommendations of Privacy Commissioner (complaints) | х | | | |
| 35(4) | Access to be given | Х | | | |
| 36(3) | Report of findings and recommendations (exempt banks) | Х | | | |
| 37(3) | Report of findings and recommendations (compliance review) | Х | | | |
| 51(2)(b) | Special rules for hearings | Х | | | |
| 51(3) | Ex parte representations | х | | | |
| 72(1) | Report to Parliament | х | | | |

Delegation of Authority Under the Privacy Regulations

| Provision | Task/Function | Position / Title | | |
|-----------|--|---------------------|-------|-------|
| | | ATIP Coordinator | TITLE | TITLE |
| 9 | Reasonable facilities and time provided to examine personal information | х | | |
| 11(2) | Notification that correction to personal information has been made | х | | |
| 11(4) | Notification that correction to personal information has been refused | х | | |
| 13(1) | Disclosure of personal information relating to physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requestor | х | | |
| 14 | Disclosure of personal information relating to physical or mental health may be made to a requestor in the presence of a qualified medical practitioner or psychologist | х | | |