**Personal Information Requests – Written Explanations**

**Proposed Implementation Check List**

This implementation checklist is intended to provide guidance to ATIP Coordinators on the steps that institutions need to take to implement the new requirements in the *Directive on Personal Information Requests.* The new requirements require institutions to provide a written explanation to the requester when a request for access to personal information takes more than 30 days to fulfil.

The proposed checklist is intended as general guidance. ATIP Coordinators are encouraged to use and adapt the content as appropriate, based on individual institutional circumstances.

1. **Privacy Policy Updates Implementation**

**30-Day Guarantee - Written explanation for extensions**

**Directive of Personal Information Requests**

4.2.7 *Providing a* ***written explanation*** *to the requester when a request for access to personal information takes more than 30 days to fulfil.*

**Business Processes**

* Review and update current business processes and internal standards to include new procedures for the written explanation
* Develop model explanation letter, obtain internal approvals ([http://www.gcpedia.gc.ca/wiki/User:XXXXXXXXXX/Privacy\_Manual/30\_Day](http://www.gcpedia.gc.ca/wiki/User%3AXXXXXXXXXX/Privacy_Manual/30_Day)) *this link is not yet live but will be in time for the implementation.*
* Develop methodology for issuing written explanations including:
	+ Process timelines
	+ Identification of the justification for extension
	+ Selection of appropriate letter model/template
	+ Routing for approval
	+ Written explanation tracking system

**Directive of Personal Information Requests**

4.2.8 ***Reporting*** *on the number of, and reasons for, extensions in the institution’s annual report to Parliament.*

**Reporting Process**

* Update tracking and reporting process as per TBS updated reporting tools
1. **Policy Updates – Institutions’ internal communications**
* Brief internally as required, including briefing packages for Deputy Heads, Ministers, etc.
* Review and update current training material, and deliver training.
1. **Implementation Tools that TBS will provide**
* Plain language explanation of the application of the policy updates
* Model written explanation letter for 30-day response or written explanation guarantee
* Q & A sessions at ATIP Community meetings
* Ongoing implementation support