

RCMP



ROYAL CANADIAN MOUNTED POLICE

ACCESS GRANTED: Restoring Trust in the RCMP Access to Information and Privacy Program

Modernization Strategy



Royal Canadian
Mounted Police

Gendarmerie royale
du Canada

Canada

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COMMISSIONER'S FOREWORD

Access by the public to government information is a core value of our democracy. Accordingly, compliance with the *Access to Information Act* and the *Privacy Act* is crucial for government departments and agencies like the RCMP. Making sure the public has timely access to information, in particular how and why the RCMP makes decisions and challenges we face, is key to maintaining and strengthening Canadians' trust and confidence in the RCMP – we simply cannot operate without it.

That is why I consider the 2020 review by the Office of the Information Commissioner (OIC) to be so important as it identified a number of challenges in our Access to Information and Privacy (ATIP) program. I am committed to modernizing our ATIP program to help ensure that it meets the expectations of Canadians. We also have the support we need to proceed from the Minister of Public Safety who has highlighted his commitment to supporting the organization to resolving the

challenges, specifically through the development and implementation of a strategy and action plan.

I am proud to present this strategy to the Minister. It addresses the Information Commissioner's recommendations, as well as outlines a goal to fully modernize the program and change how we approach access to information. As we modernize, we will be accountable not only to the Minister and Government of Canada partners, but to the Canadian public and will be fully transparent in this process along the way. Our public website will be updated quarterly with information on our plan, and, importantly, our progress.

I am personally committed, as I know that all RCMP employees are, to implementing these changes and am confident this strategy will elevate the RCMP's ATIP program to the high standard that is expected by Canadians.

Brenda Lucki



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INTRODUCTION

Canadians must have access to information in a timely and well-organized manner in order to have trust in their public institutions – it is a central tenet of our democracy. One of the primary means that the Government of Canada ensures this is through the access to information and privacy (ATIP) request process under the *Access to Information Act* and the *Privacy Act*.

As Canada’s national police service, the Royal Canadian Mounted Police (RCMP) works every day in communities from coast-to-coast-to-coast to keep Canadians safe. To do our work successfully, the RCMP depends on the trust, confidence and support of Canadians, who need

to have an understanding of our services, as well as the challenges we face and the decisions we make.

CHALLENGES IN MEETING OUR LEGISLATED RESPONSIBILITIES

Over the past decade, the RCMP has faced major challenges in responding to ATIP requests. While there are no excuses, there is an explanation: the program has remained largely the same size, while the number of requests have increased, and the tools we use are outdated. In essence, we have not kept pace with change, resulting in a program that is unable to meet expectations and its obligations. This situation was outlined in detail in two recent reviews: the 2019 RCMP internal *Audit of Access to Information*

and Privacy; and, the 2020 Office of the Information Commissioner (OIC) *Access at Issue: The Need for Leadership*.

Broadly, the 2019 Audit calls for updates to policies and guidance, including on the roles and responsibilities of employees in the ATIP process and enhancing quality assurance. Similarly, the OIC urges action to address: tasking; policies and procedures; training; electronic systems; and, insufficient resources within the program.

On February 10, 2021, the Minister of Public Safety issued the *Ministerial Directive* to the *Royal Canadian Mounted Police on Access to Information*, outlining the importance of resolving the issues identified by the Information Commissioner, and directing the organization to develop a concrete strategy addressing how it aims to undertake this effort.

ON THE HORIZON: EMERGING TRENDS AND TECHNOLOGY

We acknowledge and accept both reviews, and recognize that the RCMP must go even further. Technology is evolving at an extremely rapid rate. Canadians expect timely digital service including accessing government services from their computer or from their phone, and not the mail. New technology is introduced every day that has enormous benefits to law enforcement, but often raise significant privacy and information management concerns.

These trends compound our current challenges, requiring us to look to the future and fully **modernize** the way the RCMP approaches access to information and privacy requests, with a focus on digital ATIP services for Canadians requesting and receiving information. Our program must also be proactive – ensuring that privacy and information considerations are at the core of our decision making and information management processes to help the RCMP process requests quickly, efficiently and transparently.

THE IMPACT OF COVID-19

The COVID-19 pandemic has created challenges for all Canadians – the RCMP has been no exception. We pivoted quickly to a posture that allowed us to maintain front-line and critical services to keep Canadians safe, but the ATIP program has faced unique challenges. For instance, the RCMP still relies heavily on physical records. As Canada’s national police force, we also have access to highly sensitive material that must be protected. As such, while most of our work could be completed remotely, some could not. The RCMP continues to work on innovative solutions, and is using this opportunity to leverage lessons from the pandemic as part of the modernization effort, for instance, by examining how the Force can continue to leverage remote work and enhance digital collaboration.

SUPPORTING CHANGE

Efforts are already underway, but reform will not occur overnight; rather our vision requires transformational change over the next five years. As such, it is crucial that the RCMP monitors and tracks



DID YOU KNOW?

In Canada, two main pieces of legislation outline the government’s responsibility in regards to informing the public and the protection of privacy.

- The *Access to Information Act* (ATIA) provides a right to access information contained in records under the control of government institutions. This is under the principle that government information should be available to the public and that exceptions to the right of access should be limited and specific.
- The *Privacy Act* (PA) outlines how government organizations must handle the personal information of individuals, including how individuals can access that information.

Created in 1983, the RCMP ATIP Branch serves as the central contact point for all matters arising from both the ATIA and the PA, and ensures that any exemptions applicable under the Acts are applied before information is released to publicly.

modernization efforts, in order to communicate success and adapt to unforeseen challenges. That is why the RCMP also developed:

- **A Modernization Action Plan** that outlines the initiatives we are undertaking to modernize with clear timelines, which will be supported by a Change Management Plan to help identify and mitigate implementation challenges.
- **A Communications Strategy** outlining how we will engage with not only our personnel, but Canadians at large, to ensure full transparency.

EFFORTS TO DATE

Our efforts began once the RCMP received its 2019 audit. We took concrete steps to improve the program, including introducing mandatory training for ATIP employees; developing new policies and procedures; and, contracting support personnel to reduce our backlog.

RISING TO THE CHALLENGE NOW AND INTO THE FUTURE: OUR VISION FOR ATIP

Our goal is to develop a modern program to enable Canadians to make requests quickly, effectively and digitally, and to be fully transparent in our process. Further, we will develop policies and procedures that are clear, accessible and straightforward to increase efficiency, allowing for the rapid completion of requests while ensuring our front line personnel

have more time to keep Canada and Canadians safe.

The RCMP's proactive program will aim to make information available to the public before a request is made through the proactive disclosure of commonly requested information, and ensure programs and policies are designed at the outset with privacy and access to information in mind.

The ATIP program at NHQ and positions across the country will be staffed with highly trained professionals, using state-of-the-art technologies. Employees will be recruited for their skills and retained by the rewarding work and advancement opportunities in an organization that embraces information and privacy as a fundamental element of its business.

A FOCUS ON PRIVACY

While the Ministerial Direction's primary focus is on responding to the Information Commissioner's 2020 systemic review, our modernization effort provides us with an opportunity to reinforce the RCMP's commitment to incorporate privacy considerations and Privacy Act obligations. From the unique protections afforded to private information, to the need to assess new technologies and programs with privacy in mind, the RCMP is also committed to make privacy a cornerstone of its modernization strategy.



THE MODERNIZATION STRATEGY: ENABLING SUCCESS

We know that our future vision is far from what is in place today, but it is not out of reach. We know what must be improved, and how it must be done. To this end, our efforts will be organized across three pillars:

- **Our People** includes efforts to identify investments to expand the program, sustained by robust recruitment, development and training efforts. It also includes promoting organizational change to enhance employee commitment to information and privacy.
- **Our Tools** includes our efforts to ensure we are using state-of-the-art technology, from modernized case management software to effective technologies in the field to help organize and process requests.
- **Our Procedures** includes our efforts to bring outdated policies up to date and eliminating redundant ones, while also ensuring they are regularly maintained.

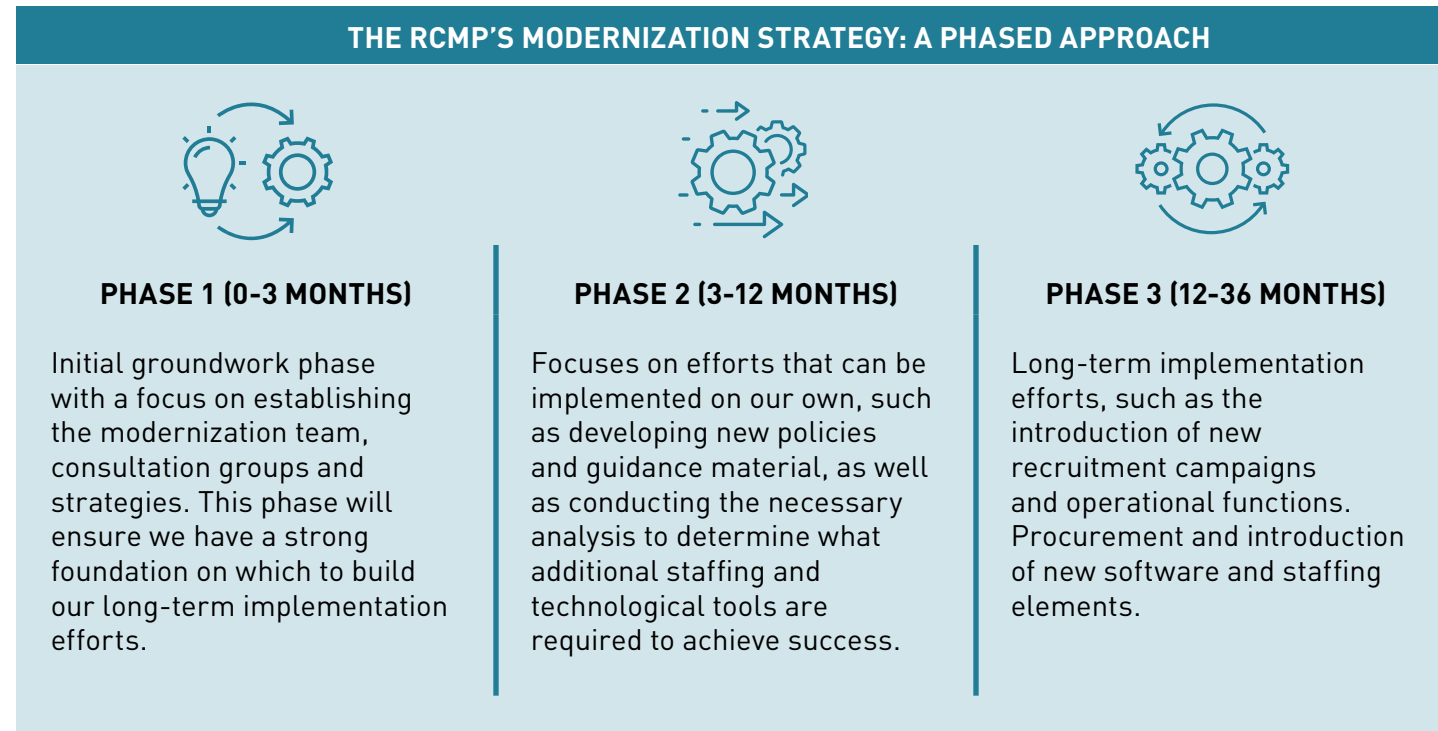
A VISION FOR ACCESS TO INFORMATION AND PRIVACY

The RCMP's modern ATIP program is a core business that ensures a transparent RCMP by being:

- **Efficient and expedient** in the processing of requests by Canadians;
- **Proactive** in the release of information;
- **Rigorous** in the applications of policies and procedures that meet the highest standards;
- **Invested** in its dedicated professionals, who work in a culture that embraces information and privacy considerations, using state-of-the-art technologies.

ATIP MODERNIZATION: A PHASED APPROACH

The RCMP's ATIP modernization efforts will require a long-term commitment as we will be implementing this strategy over three phases:



PILLAR ONE: OUR PEOPLE

Like all organizations, people are at the core of what we do: whether on the frontlines or in the back office, all RCMP employees help keep Canadians safe.

TODAY'S ATIP PROGRAM

At its core, the RCMP's ATIP program is made up of dedicated employees within National Headquarters (NHQ) who perform a large portion of the work to process ATIP requests: from the initial receipt and public engagement; to reviewing material for potential exemptions; and to sending the completed product to the requester. They also work with the Office of the Privacy Commissioner (OPC) and the OIC to resolve complaints made by the public, maintain operational policies and procedures, and advise on the RCMP's responsibilities under both Acts. This core team is supported by personnel in the divisions across the country. The ATIP liaison officers across the country help coordinate the collection of requests; this function is in addition to their main duties. Additionally, all employees across the country have a responsibility to support the ATIP program, through the identification and review of materials subject to requests in their role as Offices of Primary Interest (OPIs).

OUR CHALLENGES

These dedicated professionals work diligently to ensure that we meet our obligations, under the Acts and to the public. However, they face numerous challenges:

- **Workload:** Over the past two decades, digitization has not only increased public expectations of service, but the size of our own information holdings. This has resulted in an increase in the number of requests, and the size of the responses. Despite this, our program has largely remained the same size and we do not have sufficient employees to meet the growing demand.

- **Recruitment and retention:** ATIP is a unique field, and there continues to be a limited number of applicants who seek ATIP as a career path, which results in a significant demand across the Government of Canada for ATIP professionals, especially in the National Capital Region. This recruitment challenge, combined with an increased retirement rate, has led to vacancies in the RCMP and across the government.
- **Training and skill development:** The reviews recommended that we address a lack of awareness of employee obligations under both Acts. However, while training in relation to these obligations is crucial, it is not enough as there are gaps in other core competencies, such as providing supervisors and managers with advanced leadership and supervisory training and digital skills training.
- **Culture change:** More needs to be done to ensure that employees embrace their responsibilities under both Acts as a core part of business, be they a new employee or a seasoned professional.

OUR ACTIONS

Ensuring that the RCMP has the dedicated resources required, in NHQ and in divisions, supported by robust leadership and training is necessary to not only modernize the program, but to promote organizational change throughout the Force. That is why the RCMP must adopt a holistic approach to the recruitment and retention of personnel and lead the transition toward a digital workforce in line with the expected results of the Policy on Service and Digital. Some of the actions we will take include:

- **Creating a developmental program and recruitment campaign:** Based on best practices from other agencies, in particular Treasury Board Secretariat (TBS), we will put in place a developmental program that attracts new talent from across Canada, and helps us retain employees by providing them with a clear career path.
- **Expanding our training curriculum:** We will introduce mandatory training on both Acts. We will also

create a clear, responsibility-based program for ATIP employees that will identify additional competency training, from advanced digital skills to leadership training. This will improve our retention by helping employees advance their careers and manage the pressures of the increasing workload.

- **Developing a human resource strategy:** A modernized ATIP program requires not only additional analysts, but key supporting functions such as dedicated training, policy and quality-assurance personnel. Further, a modern ATIP program requires more management and leadership positions to ensure that there is robust capacity to not only influence RCMP decision-making, but to develop and lead personnel. We will build a strategy to outline both our staffing needs, as well as a plan on how we will fill these positions.

- **Engaging with stakeholders:** ATIP cannot be examined within the context of NHQ alone - front-line employees must have the support they need to meet their obligations. We will work with divisions to identify what resources, training and technology they need for success. We will also enhance leadership accountability in the divisions to promote culture change and ensure timely and complete responses.
- **Examining our resource base:** We will do all we can to improve the program within existing funds, but new investment for technology and staff will be necessary. We will work with TBS to examine the resource base of the ATIP program, including potential reallocation of existing RCMP resources or a request for new resources.

PILLAR TWO: OUR TOOLS

Technology is crucial to the effectiveness of a modern police organization. Just as the latest technologies assist us in investigating crime, technology is also crucial to the proper functioning of the ATIP program.

ATIP'S CURRENT TOOLSET

By their very nature, ATIP requests require processing records. Members of the public submit a request to the RCMP, either through a digital portal or by mail, which is reviewed to identify where the records may be held, and then tasked out appropriately. Assembled records are then collected, reviewed by OPIs, and submitted for assessment and possible exemptions under both Acts. A request could involve a single page, or thousands of multipage documents.

To help manage this process, the RCMP uses a number of technological tools. Our case management software allows personnel to manage requests, keep track of tasks, and collate and redact records. The ATIP program also relies on a broad range of related technologies. For example, physical documents, both in terms of incoming requests as well as records, must be scanned and digitally stored. Public requests often involve video or audio formats, which requires additional software to review and process.

OUR CHALLENGES

Outdated and inefficient tools have created challenges for the efficient functioning of the ATIP program.

- **Interfacing with the public:** While Canadians are able to make requests through an online portal, our website does not emphasize this feature. The RCMP also lacks the necessary tools to allow Canadians to track their online requests, or to learn more about the RCMP's ATIP program.
- **Antiquated case management software:** Our case management system is over a decade old. It lacks many of the necessary features required to streamline processes, handle digital records, and provide necessary business intelligence.
- **Information management:** The RCMP's overall information management (IM) capabilities require significant enhancement – we are too dependent on paper-based processes. This creates enormous challenges, as digitizing records is extremely time consuming. Additionally, various software products that are currently being leveraged for digital record keeping are not always compatible with our ATIP case management software.
- **Tools of the trade:** Not all employees have access to the tools they need. For example, aging computers have impacted employees working and engaging from home during the COVID-19 pandemic.



ACTIONS AT A GLANCE

People are at the very core of our modernization efforts – that is why the RCMP will:

- establish a program to attract and develop new talent and provide them with a clear career path;
- develop and action a human resource strategy to guide recruitment and retention efforts;
- clearly outline the roles and responsibilities of all employees, supported by clear performance standards; and,
- enhance training and delivery, to increase awareness of the *Access to Information Act* and the *Privacy Act*, and advance core leadership, digital and communications skills.

SPOTLIGHT ON INFORMATION MANAGEMENT MODERNIZATION

The ATIP Program will be collaborating with its IM/IT colleagues on key elements of enterprise IM modernization. The ATIP program will directly benefit from enhancement to various IM services and solutions including: electronic document management; information and data governance; information architecture; open government; data analytics; and, an enterprise policy hub.

OUR ACTIONS

Ensuring that our personnel have modern software and technical tools to conduct their activities is critical to a modern ATIP program. That is why the RCMP will be:

- **Interfacing with the public:** Canadians expect to engage digitally with us. We will be introducing a range of improvements: updating our external website to be more intuitive and accessible; evaluating and introducing a new digital request portal with the assistance of TBS; and, identifying a user-centric approach by which the public can monitor and track their request as it is processed.

- **Procuring of new case management software:** With the assistance of TBS, we will explore a number of new case management software options with a goal of ensuring that it is fully compatible with our existing IM software to enhance the efficiency of retrieving and processing records. We will also be evaluating what additional software could benefit the ATIP program, such as innovative technology to process other types of digital media like video and audio.
- **Analysing hardware requirements:** We will also examine whether additional hardware tools are required in both NHQ and the divisions to ensure employees are well equipped to process requests and to reduce technology-related delays.



ACTIONS AT A GLANCE

Technology is critical to our success – Canadians expect timely and accessible digital services. That is why the RCMP will:

- evaluate and procure user-friendly digital technologies to enhance the public’s ability to make and track requests;
- evaluate and procure innovative new case management software to facilitate our processing of requests and ensure interoperability with other systems;
- identify technology gaps in divisions that create inefficiencies or delays in collecting records; and,
- support broader RCMP efforts to modernize our information management practices to help ensure the RCMP is a more transparent and data-driven organization.

PILLAR THREE: OUR PROCEDURES

Policies and procedures are at the core of how we operate. Employees rely on policies and procedures to guide their actions and to understand the organization’s expectations of them. They rely on official policies through the Operational Manual, and standard operating procedures (SOPs) drafted within individual units to guide them in their daily activities.

THE CHALLENGE: FINDING THE RIGHT POLICIES AT THE RIGHT TIME

Outdated and inefficient policies and procedures are creating challenges in meeting our obligations:

- **Out-of-date policies:** Some policies are out of date and refer to processes that are no longer in place. In other cases, they need to be modernized; for example, current policies do not expressly outline the accountability of senior personnel in the divisions in the ATIP request process, which represents a significant gap.
- **Policies are difficult to locate:** Employees often have to search for these policies and procedures—they are not accessible in a standardized location. This can create delays, or worse, result in inconsistent application of policies in the conduct of ATIP activities.
- **Need for standardized forms:** We lack standardized, digital forms which can help reduce delays resulting from incomplete requests. For instance, the OIC specifically outlines the need for OPIs to indicate how they searched for records – something which could be streamlined through user-friendly, and data-driven digital forms.

OUR ACTIONS

Ensuring that official policies and procedures are available and understood by employees, and that processes are in place to continuously review and improve these procedures, are essential to modernization. Recognizing this, the RCMP will be:

- **Conducting an efficiency exercise:** review all existing policies and procedures to identify efficiencies, where possible, with a goal of reducing the overall number of steps in the ATIP process and enhancing overall quality assurance and accountability.
- **Updating the core policy and SOP suite:** Efforts have already begun to update the official policy and ATIP SOP suite, but these efforts will be expanded to address all identified areas for improvement. We will ensure this effort is continuous, so that policies and procedures remain up to date as other initiatives are implemented. This will help ensure that our decisions are data-driven and are based on evidence, and that we have robust quality assurance mechanisms in place. Further, this will help us identify what information Canadians commonly request, and develop means by which to release this information proactively. This will help us be more transparent with Canadians while helping to reduce the number of requests we receive.
- **Going digital:** Develop new, data driven, user-friendly digital forms and guidance tools to help our employees respond to requests. For instance, we will create a new digital OPI checklist and examine new, digital tools to help intake personnel appropriately task requests.
- **Developing a “Big Book of Answers”:** We will make policies easy to locate and accessible for all ATIP employees by making them available at a click of a button in a central location. As part of the Our People pillar’s training curriculum, training materials will be updated to ensure employees are aware of the location of the policy and procedure suite.

ACCOUNTABILITY, RISK MITIGATION AND ASSESSING ACHIEVEMENT

This strategy outlines an ambitious plan to modernize the ATIP program. Implementation will not be without its challenges – that’s why it is crucial that our modernization efforts are fully accountable, anticipate and mitigate risks, and have clear indicators for success.



ACTIONS AT A GLANCE

A modern, efficient ATIP program cannot be successful without clear, transparent and easily-accessible policies and procedures. That is why the RCMP will:

- conduct a robust review of all policies and procedures at every step in the ATIP program with the assistance of a recognized business consultancy firm;
- update guidance materials for ATIP personnel in the divisions and NHQ that clearly identifies the mandates, information holdings and points of contact of RCMP business lines;
- introduce new digital forms and checklists to help guide OPIs in their collection of records, and help to identify incomplete responses;
- update out of date operational policies and SOPs to ensure that personnel can have the most up to date guidance on how to proceed; and,
- leverage technology to create central repositories for ATIP related policies and procedures.

GOVERNANCE AND ACCOUNTABILITY

The RCMP is developing a robust governance framework to identify various accountability mechanisms to guide our efforts and ensure success. For instance, internal governance will be ensured through a number of oversight bodies such as the Senior Management Team, supporting management committees and the RCMP Management Advisory Board.

External to the RCMP, structures such as the Government of Canada Enterprise Architecture Review Board will be leveraged to ensure that efforts to modernize our software and digital services are fully informed by the latest guidance and direction from the Government of Canada, and are innovative and user friendly. This will also help ensure that the

RCMP adheres to TBS policies and directives such as the Policy on Access to Information; the Policy on Privacy Protection; Policy on Service and Digital; the Directive on Service and Digital policies; and the Directive on Open Government, to help meet the government’s commitments to transparency, accountability and service and digital transformation. We will continue to seek support and guidance from TBS in the implementation of this strategy and through the ongoing leadership and support TBS provides to the entire ATIP community.

Ultimately, this modernization effort is about improving our services to Canadians. That is why the RCMP is committed to remaining accountable to the Canadian public through quarterly progress updates on our website to identify not only our successes, but any challenges we may encounter.

RISK IDENTIFICATION AND MITIGATION

The RCMP will work to identify innovative solutions to modernize the ATIP program. As with any effort to modernize, it will not be without risk – initiatives could fail, or have the opposite affect to that desired. We will not shy away from being innovative just because there is risk – we must pursue well considered risk in order to achieve success, and accept that there may be mistakes or missteps. When outcomes do not meet our expectations, we will analyse them to discover what did not work, and modify our approach accordingly. Initiatives will be piloted before being put in place to identify and address potential concerns and mitigate them early. Further, initiatives will be fully consulted and reviewed continuously to identify, evaluate and, where possible, mitigate potential risks.

ASSESSING PERFORMANCE

The RCMP will track our progress through the informed and descriptive indicators outlined in the Modernization Action Plan, which includes clear timelines. Through this formal approach, supported by the robust accountability and governance structure, we will ensure that implementation remains on track, and supported by senior management and employees alike. To evaluate the outcomes of initiatives, and through consultation sessions with employees, we will monitor impacts on our compliance rates. Through the development of clear performance metrics, we will be able to relate longer-term impacts of modernization initiatives, providing a more accurate indication of the success of the approach. Ultimately, the success of this strategy will be measured in a gradual increase in compliance rates, as well as a steady decrease in public complaints.



CONCLUSION

We are responsible under the *Access to Information Act* and the *Privacy Act* to provide Canadians with timely access to information about our services and are confident that this strategy will indicate the commitment we have towards meeting those responsibilities. Canadians expect the best from us and we must meet their expectations.

Major changes in modernizing culture and fundamental practices do not occur overnight – we are in this for the long-term. However, we will also be making every effort to identify immediate and impactful solutions to increase our compliance

rate and address the recommendations by the Information Commissioner and our own internal audit, as well as necessary improvements to enhance our compliance under the *Privacy Act*.

We are confident that this strategy and plan puts us on the right path, and we are committed to keep momentum going until, and even after, the RCMP ATIP program is fully modernized and responsive to the needs of all Canadians.

We won't stop until access to information and our obligations under the *Privacy Act* move to the forefront of our actions and becomes rooted in our culture.

