

**DEVELOPMENT FINANCE INSTITUTE  
CANADA (DFIC) INC.**



**ANNUAL REPORT  
ON THE ADMINISTRATION  
OF THE  
*ACCESS TO INFORMATION ACT***

**1 APRIL 2023 – 31 MARCH 2024**

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## INTRODUCTION

The purpose of the *Access to Information Act* (“Act”) is to enhance the accountability and transparency of federal institutions to promote an open and democratic society and enable public debate on the conduct of those institutions.

Development Finance Institute Canada (DFIC) Inc. (“FinDev Canada”) is a crown corporation and wholly owned subsidiary of Export Development Canada (EDC). FinDev Canada is Canada’s bilateral Development Finance Institution (DFI), supporting development through the private sector. FinDev Canada provides financing, investment, and blended finance solutions, as well as technical assistance and knowledge, to promote sustainable and inclusive growth in Latin America and the Caribbean, Sub-Saharan Africa and the Indo-Pacific region, aligned with the Sustainable Development Goals (SDGs) and Paris Agreement commitments. FinDev Canada targets development objectives in three impact areas: climate and nature action, gender equality and market development. FinDev Canada’s services are directed towards three sectors: the financial industry; agribusiness, forestry and value chains; and sustainable infrastructure.

This report is prepared and tabled in Parliament in accordance with section 94 of the Act.

## ORGANIZATIONAL STRUCTURE

FinDev Canada relies on EDC’s Privacy and Information Risk (“P&IR”) Team to administer and respond on requests made under the Act. The P&IR Team is part of the Compliance and Ethics Group. The P&IR Team has, among other responsibilities, primary responsibility for administering the *Privacy Act* and the *Access to Information Act* and is responsible for responding to requests submitted to EDC and FinDev under these Acts. Throughout the reporting period, the team was comprised of 6 full-time employees, with 2 employees dedicated to Access to Information. The team was overseen by the Director, Ethics, Privacy and Information Risk, who reported to the Chief Compliance and Ethics Officer, who in turn reported to the Chief Executive Officer of FinDev Canada.

With respect to “proactive publication” requirements under Part 2 of the Act, while the P&IR Team is responsible for meeting the obligation under section 84 (publishing reports tabled in Parliament), EDC’s Costing Team within the broader EDC Finance Group is responsible for ensuring that FinDev Canada meets its obligations under sections 82 (publishing travel expenses) and 83 (publishing hospitality expenses).

FinDev Canada has an agreement in place, entered into pursuant to section 96 of the Act, for the receipt of access to information services provided by EDC.

## DELEGATION ORDER

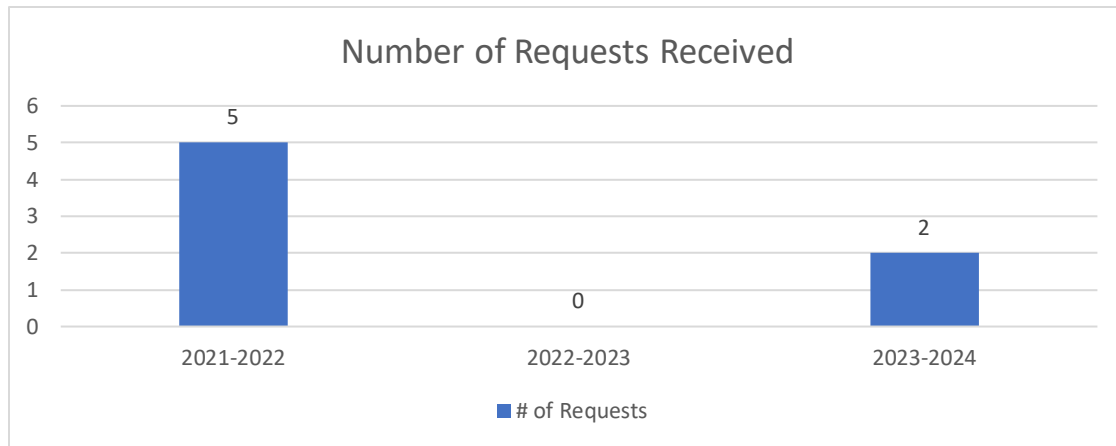
A copy of the delegation order that was made pursuant to section 95(1) of the Act and was in effect at the end of the reporting period is attached at Appendix A.

## PERFORMANCE 2023-2024

Below is an overview of key data on FinDev Canada's performance during the reporting period.

- Two new requests for information were received during the reporting period. Two requests were carried over from previous reporting periods.
- Of the three requests that were completed during the reporting period, 66% were responded to within the legislated timelines.
- Of the three requests that were completed during the reporting period:
  - Two were completed within 16-30 days, and
  - One was completed after 365+ days.
- Of the three requests that were completed during the reporting period, one request required an extension pursuant to both sections 9(1)(a) of the Act (due to the large number of pages required to be processed) and 9(1)(c) (due to the obligation to notify third parties of the intention to disclose records).
- Of all requests completed, 33% of them involved records that were “disclosed in part” (as compared to “disclosed in full”), and 67% were “no records exist”.
- As of the last day of the reporting period, there was one active request, which was received in the 2019-2020 reporting period and is outside of the legislated timelines. As of the last day of the reporting period, there were no active complaints.
- No consultation requests from other government institutions were completed or received during the reporting period.

FinDev Canada experienced an increase in the number of requests received under the Act compared to the previous period. The chart below shows the trend for the past three reporting periods.



### **TRAINING AND AWARENESS PROGRAM**

During the reporting period, all new employees were subject to mandatory privacy and access to information awareness training, for a total of 32 employees for the reporting period.

### **INSTITUTION SPECIFIC POLICIES, GUIDELINES AND PROCEDURES**

FinDev Canada did not implement any new or revised institution-specific policies, guidelines, procedures or initiatives related to access to information during the reporting period.

### **PROACTIVE PUBLICATION**

FinDev Canada is a “government institution” for the purposes of Part 2 of the Act and is subject to sections 82 (publishing travel expenses), 83 (publishing hospitality expenses), and 84 (publishing reports tabled in Parliament).

FinDev Canada publishes travel and hospitality expenses incurred by its Chief Executive Officer, senior executives and Board members on its [Transparency and Disclosure](#) webpage.

In 2023, EDC finalized the design and began executing a process to enhance compliance with its proactive publication requirements. The process included formalizing responsibility and processes for EDC and FinDev Canada for managing these requirements. It also clarified the specific information required to be published and associated timelines. To facilitate compliance, travel and hospitality expenses are approved in a centralized expense system that populates a general ledger from which relevant expenses are extracted for publication. Publications to Open Government started in June 2023 and from October 2023, FinDev Canada has been in compliance with monthly travel and hospitality proactive publication requirements and associated timelines. Documented procedures supporting such publication were enhanced and approved in December 2023.

With respect to reports tabled in Parliament during the 2023-2024 reporting period, FinDev Canada’s reports tabled after the effective date of the proactive publication requirement have been published to Open Government within the required timelines, leveraging accessibility features in third party tools while development of accessibility capabilities continues. The

drafting and approval of supporting procedures were in progress at the end of the reporting period.

The table below identifies which proactive publication requirements apply to FinDev Canada.

### Proactive Publication Requirements Table

Legislative Requirement	Section	Publication Timeline	Institutional Requirement
<b>All Government Institutions as defined in section 3 of the <i>Access to Information Act</i></b>			
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Applicable to FinDev Canada
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Applicable to FinDev Canada
Reports tabled in Parliament	84	Within 30 days after tabling	Applicable to FinDev Canada
<b>Government entities or Departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the <i>Financial Administration Act</i></b>			
Contracts over \$10,000	86	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	N/A
Grants & Contributions over \$25,000	87	Within 30 days after the quarter	N/A
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	N/A
Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that is received by their office	88(b)	Within 30 days after the end of the month received	N/A
Packages of briefing materials prepared for a deputy head or equivalent's appearance before a committee of Parliament	88(c)	Within 120 days after appearance	N/A
<b>Government institutions that are departments named in Schedule I to the <i>Financial Administration Act</i> or portions of the core public administration named in Schedule IV to that Act (i.e. government institutions for which Treasury Board is the employer)</b>			
Reclassification of positions	85	Within 30 days after the quarter	N/A

<b>Ministers</b>			
Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	N/A
Titles and reference numbers of memoranda prepared by a government institution for the minister, that is received by their office	74(b)	Within 30 days after the end of the month received	N/A
Package of question period notes prepared by a government institution for the minister and in use on the last sitting day of the House of Commons in June and December	74(c)	Within 30 days after last sitting day of the House of Commons in June and December	N/A
Packages of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament	74(d)	Within 120 days after appearance	N/A
Travel Expenses	75	Within 30 days after the end of the month of reimbursement	N/A
Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	N/A
Contracts over \$10,000	77	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	N/A
Ministers' Offices Expenses *Note: This consolidated report is currently published by TBS on behalf of all institutions.	78	Within 120 days after the fiscal year	N/A

## **INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION**

During the 2023-2024 reporting period, FinDev Canada completed the process of onboarding to ATIP Online, a centralized, publicly facing website hosted by the Treasury Board Secretariat for individuals to submit requests.

## **COMPLAINTS**

During the reporting period, FinDev Canada did not receive any new complaints under the Act, nor did it close any complaints.

## **MONITORING COMPLIANCE**

FinDev Canada uses AccessPro Suite by CSDC Systems Inc. to manage all requests received under the Act. The software has a dashboard function that enables monitoring of the status and time taken to process access to information requests.

To manage inter-institutional consultation, the P&IR Team incorporated the specific criteria for triggering such consultations into its request handling procedure, such that consultation is warranted in two circumstances: if more information is needed to enable the proper exercise of discretion to withhold information or FinDev Canada intends to disclose potentially sensitive information.



**APPENDIX A – DELEGATION OF AUTHORITY**

**DEVELOPMENT FINANCE INSTITUTE CANADA (DFIC) INC. (“FinDev Canada”) TABLE OF AUTHORITY**

**DELEGATIONS OF AUTHORITY  
PURSUANT TO SECTION 71 OF THE *ACCESS TO INFORMATION ACT* AND REGULATIONS  
PRIVACY AND ACCESS TO INFORMATION (PRIVACY & ATI) TEAM, GLOBAL RISK MANAGEMENT (GRM)**

**Authorization**

1. Authorization to exercise or perform powers, duties or functions of the head of the institution under the Access to Information Act and Regulations.

<i>Access to Information – Section 71</i>																																				
SECTIONS	4(2.1)	6.1(1)	7(a)	7(b)	8(1)	9	10(1)	11(2)	12(2)(b)	12(3)(b)	13	14	15	16	16.5	17	18	18.1	19	20	21	22	22.1	23	24	25	26	27(1),(4)	28(1)(b),(2),(4)	33	35(2)(b)	37(4)	43(2)	44(2)	52(2)(b),(3)	
CHIEF EXECUTIVE OFFICER	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
CHIEF COMPLIANCE AND ETHICS OFFICER	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<i>Access to Information Regulations. Section 73</i>																																				
SECTIONS	6(1)	7(2)	7(3)	8	8.1																															
CHIEF EXECUTIVE OFFICER	X	X	X	X	X																															
CHIEF COMPLIANCE AND ETHICS OFFICER	X	X	X	X	X																															

**DFIC DELEGATIONS OF AUTHORITY  
PURSUANT TO SECTION 71 OF THE *ACCESS TO INFORMATION ACT* AND REGULATIONS  
PRIVACY & ATI TEAM / (GRM)**

<i>Access to Information Act – Sections</i>			<i>Access to Information Regulations. -Sections</i>
4(2.1) Responsibility of government institutions	17 Exemption - Safety of individuals	27(1),(4) Third party-notification	
6.1(1) Reasons for declining to act on request	18 Exemption - Economic interests of Canada	28(1)(b),(2),(4) Third party-notification	6(1) Transfer of request
7(a) Notice when access requested			
7(b) Giving access to record	18.1 Exemption - Economic interest of the Canada Post Corporation, Export Development Canada, the Public Sector Pension Investment Board and VIA Rail Canada Inc.	33 Advising Information Commissioner of third-party involvement 35(2)(b) Right to make representations	7(2) Search and preparation fees
8(1) Transfer of request to another government institution	19 Exemption - Personal Information	37(4) Access to be given to complainant	
9 Extension of time limits	20 Exemption - Third-party information	43(2) Notice to third party (application to Federal Court for review)	7(3) Production and programming fees
10(1) Access refusal	21 Exemption - Operations of Government	44(2) Notice to applicant (application to Federal Court by third party)	
11(2) Additional Fees			
12(2)(b) Language of access	22 Exemption - Testing procedures, tests and audits	52(2)(b),(3) Special rules for hearings	8 Providing access to record(s)
12(3)(b) Access in an alternative format			
13 Exemption - Information obtained in confidence	22.1 Exemption – Audit working papers and draft audit reports		
14 Exemption - Federal-Provincial affairs	23 Exemption - Solicitor-client privilege		8.1 Limitations in respect of format
15 Exemption - International affairs and defence	24 Exemption - Statutory prohibitions		
16 Exemption - Law enforcement and investigations	25 Severability		
16.5 Exemption – <i>Public Servants Disclosure Protection Act</i>	26 Exemption - Information to be published		

**DFIC DELEGATIONS OF AUTHORITY  
PURSUANT TO SECTION 71 OF THE *ACCESS TO INFORMATION ACT* AND REGULATIONS  
PRIVACY & ATI TEAM / GLOBAL RISK MANAGEMENT (GRM)**

2. **Titles**

All of the above titles include their equivalent under any future designation.

3. **Previous Authorities**

All current authority designations executed by the Chief Executive Officer of FinDev Canada (i.e. the head of the institution) (the “Designations”), are replaced by these Table of Authority and Table Notes without in any way affecting the validity of acts done pursuant to such Designations.

4. **Signing Authority**

The Chief Executive Officer, acting alone or with one of the following, or any two of the following, acting together:

- Chief Compliance and Ethics Officer (FinDev Canada)
- Director, Compliance and Ethics (EDC)
- Principal, Privacy and Access to Information (EDC)

are hereby authorized and directed to: (a) execute or cause to be executed all such instruments, agreements and documents; and (b) do or cause to be done all acts and things; as may be necessary or desirable to give effect to this Delegation of Authorities.  
“EDC” means Export Development Canada.



\_\_\_\_\_  
Chief Executive Officer (Acting)

July 24, 2020

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Date

