



ADMINISTRATION OF THE NORTHWEST TERRITORIES

ACCESS TO INFORMATION AND PROTECTION OF PRIVACY ACT

ANNUAL REPORT 2024-2025

English

French

Cree

Tłychq

Chipewyan

South Slavey

North Slavey

Gwich'in

Inuvialuktun

Inuktitut

Inuinnaqtun

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Executive Summary

The “Administration of the Northwest Territories *Access to Information and Protection of Privacy Act* Annual Report” for the 2024-25 fiscal year was prepared in accordance with section 75 of the *Access to Information and Protection of Privacy Act* (the ATIPPA). The Annual Report provides statistical information pertaining to all access to information requests received by the Government of the Northwest Territories (GNWT) departments and other public bodies designated under the *Access to Information and Protection of Privacy Regulations*. The Annual Report includes information on measurables such as the volume of access requests received, the time taken to process requests, and other factors associated with the administration of the ATIPPA. Pursuant to section 75 of the ATIPPA the Annual Report provides the public with specifics in relation to:

- The number of requests made pursuant to the ATIPPA received by the public body in the fiscal year;
- The time taken to process the requests;
- The number of requests that were denied, and the exceptions that were relied upon to justify the denial;
- The amount of fees collected;
- The justification relied on for any extension of time; and
- The number of privacy impact assessments conducted in the fiscal year.

The Annual Report presents access to information and privacy related data and supports the spirit of the ATIPPA by demonstrating our commitment to access to information and the protection of privacy. This information is provided to NWT residents to relay how access requests are being handled and ensuring that there is transparency in the process.

Sommaire

Le « Rapport annuel 2024-2025 sur l'administration de la *Loi sur l'accès à l'information et la protection de la vie privée* des Territoires du Nord-Ouest » pour l'exercice financier de 2024-2025 a été préparé conformément à l'article 75 de la *Loi sur l'accès à l'information et la protection de la vie privée* (LAIPVP). Ce rapport annuel a pour objectif de fournir des renseignements statistiques sur toutes les demandes d'accès à l'information reçues par les ministères du gouvernement des Territoires du Nord-Ouest (GTNO) et d'autres organismes publics désignés en vertu du *Règlement sur l'accès à l'information et la protection de la vie privée*. Ce rapport comprend des renseignements sur des données mesurables, telles que le volume de demandes d'accès à l'information reçues, le délai de traitement des demandes et d'autres facteurs liés à l'administration de la LAIPVP. Conformément à l'article 75 de la LAIPVP, le rapport annuel fournit au public les renseignements détaillés suivants :

- Le nombre de demandes présentées en vertu de la LAIPVP qu'a reçues l'organisme public au cours de l'exercice en question;
- Le délai de traitement des demandes;
- Le nombre de demandes rejetées et d'exceptions sur lesquelles s'est fondé l'organisme public;
- Le montant des droits perçus;
- Le motif invoqué pour justifier toute prorogation de délai;
- Le nombre d'évaluations des facteurs relatifs à la vie privée auxquelles l'organisme public a procédé au cours de l'exercice en question.

Le rapport annuel présente les données concernant l'accès à l'information et la protection de la vie privée, et soutient l'esprit de la LAIPVP en démontrant notre engagement envers l'accès à l'information et la protection de la vie privée. Ces renseignements sont fournis aux résidents des TNO pour qu'ils sachent comment les demandes d'accès sont traitées, et pour que le processus demeure transparent.

1.0 Overview

The *Administration of the Northwest Territories Access to Information and Protection of Privacy Act Annual Report 2024-2025* (the “Annual Report”) provides statistical information pertaining to all access to information requests received by the Government of the Northwest Territories (GNWT) departments and other public bodies designated under the *Access to Information and Protection of Privacy Regulations* (“the ATIPP Regulations”) between April 1, 2024 and March 31, 2025.

This Annual Report includes information on measurables such as the volume of access requests received, the time taken to process requests, and other factors associated with the administration of the *Access to Information and Protection of Privacy Act* (the “ATIPPA”). Data reported on requests closed in 2024-25 may include requests that were received in previous fiscal years.

1.1 Legislative Framework for Reporting

Section 75 of the ATIPPA requires every public body subject to the ATIPPA to report to the Minister of Justice within 60 business days after the end of the fiscal year:

- The number of requests made pursuant to the ATIPPA received by the public body in the fiscal year;
- The time taken to process the requests;
- The number of requests that were denied, and the exceptions that were relied upon to justify the denial;
- The amount of fees collected;
- The justification relied on for any extension of time; and
- The number of privacy impact assessments conducted in the fiscal year.

The Minister of Justice must then table an Annual Report containing this information in the Legislative Assembly within 60 business days after receiving the information or during the next sitting of the Legislative Assembly (if the Legislative Assembly is not sitting on the expiry of the 60 business days after the Minister receives the information).

1.2 *The Access to Information and Protection of Privacy Act*

The ATIPPA, which came into force in 1996, plays a critical role in maintaining accountability and protecting the public's personal information held by government.

The ATIPPA:

- Gives individuals the right to request access to information held by GNWT departments and public bodies designated under the ATIPP Regulations;
- Gives individuals the right to access and correct their personal information that is held by GNWT departments and public bodies designated under the ATIPP Regulations;
- Specifies the limited exceptions to the right of access;
- Sets out when a GNWT department or other public body may collect, use, and disclose personal information; and
- Provides for an independent review of decisions made under the ATIPPA.

As per section 74, the ATIPPA must be reviewed by the Minister within 18 months after the commencement of the Twentieth Legislative Assembly. The Department of Justice began a review of the ATIPPA in the spring of 2025 by including a review of the ATIPPA and the GNWT Access and Privacy Office (the "APO") under the Government Renewal Initiative. An evaluation firm was selected in early 2025 and is currently undertaking this work. The Minister will table a report on review results in the Legislative Assembly.

1.3 *Services of the GNWT Access and Privacy Office*

The GNWT APO provides support to the Minister of Justice in all aspects of the implementation and administration of the ATIPPA across government. This includes responsibility for government-wide support and leadership in assisting departments and public bodies in complying with the ATIPPA.

Since 2021, GNWT access and privacy services have been centralized in the APO. The APO is responsible for:

- Processing access to information requests and responding to reviews by the Information and Privacy Commissioner for all government departments and Housing NWT, while continuing to provide advice and assistance to the other 21 public bodies subject to the ATIPPA.

- Developing resources and guidelines related to managing privacy breaches, conducting privacy impact assessments, and establishing personal information sharing agreements.
- Developing, coordinating and ensuring the delivery of access to information and protection of privacy training for employees of the GNWT, Housing NWT and public bodies to ensure they have the level of knowledge required to meet program responsibilities under the ATIPPA.

It is important to note that although the APO processes all access to information requests for GNWT departments and Housing NWT, any final decision-making related to those requests and reviews remains with those public bodies.

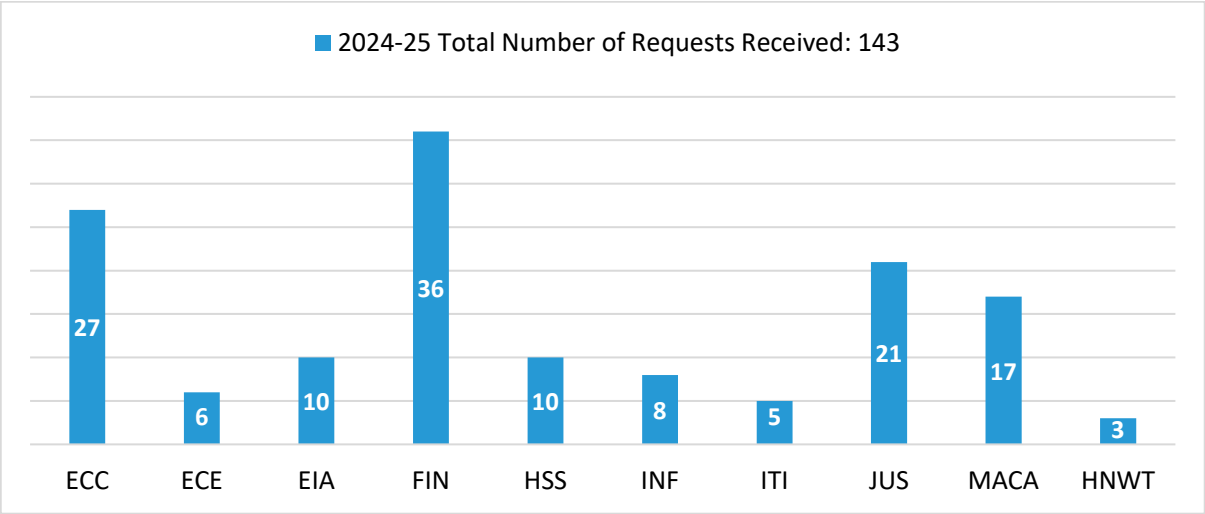
In-person training is offered for dedicated access and privacy coordinators and includes an orientation for new hires responsible for this work, and an introduction to the ATIPPA. The APO recently updated the online general awareness course for all GNWT employees to reflect the 2021 ATIPPA amendments. This online training course is also accessible to the public free of charge and can be found on the Department of Justice website.

2.0 Statistics on 2024-2025 Access Requests

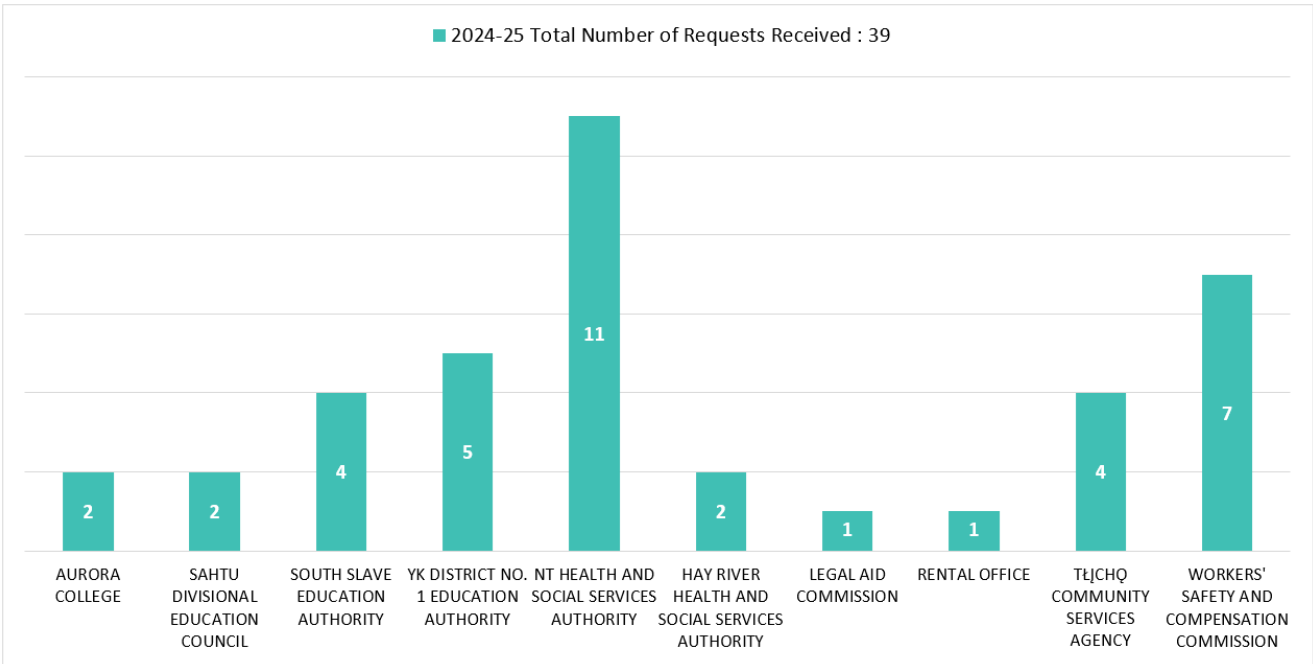
2.1 Number of Access Requests

Please note, in this Annual Report the data on requests **received** is limited to requests received between April 1, 2024, and March 31, 2025. In 2024-25, a total of **182 new** requests for access to information were received by the GNWT APO and public bodies. Please note, the GNWT APO processes access requests on behalf of the Department of Environment and Climate Change (ECC), the Department of Education, Culture and Employment (ECE), the Department of Executive and Indigenous Affairs (EIA), the Department of Finance (FIN), the Department of Health and Social Services (HSS), the Department of Infrastructure (INF), the Department of Industry, Tourism and Investment (ITI), the Department of Justice (JUS), the Department of Municipal and Community Affairs (MACA), and Housing Northwest Territories (HNWT). As indicated previously, there are an additional 21 other public bodies that do not fall under the GNWT APO's centralized service. This Annual Report will refer to this group as "public bodies". A listing of these public bodies can be located within Schedule A of the ATIPP Regulations found here: <https://www.justice.gov.nt.ca/en/files/legislation/access-to-information-and-protection-of-privacy/access-to-information-and-protection-of-privacy.r1.pdf>.

Graph 1: Number of access requests received by the GNWT APO in 2024-25
 (Includes 9 GNWT departments and HNWT)

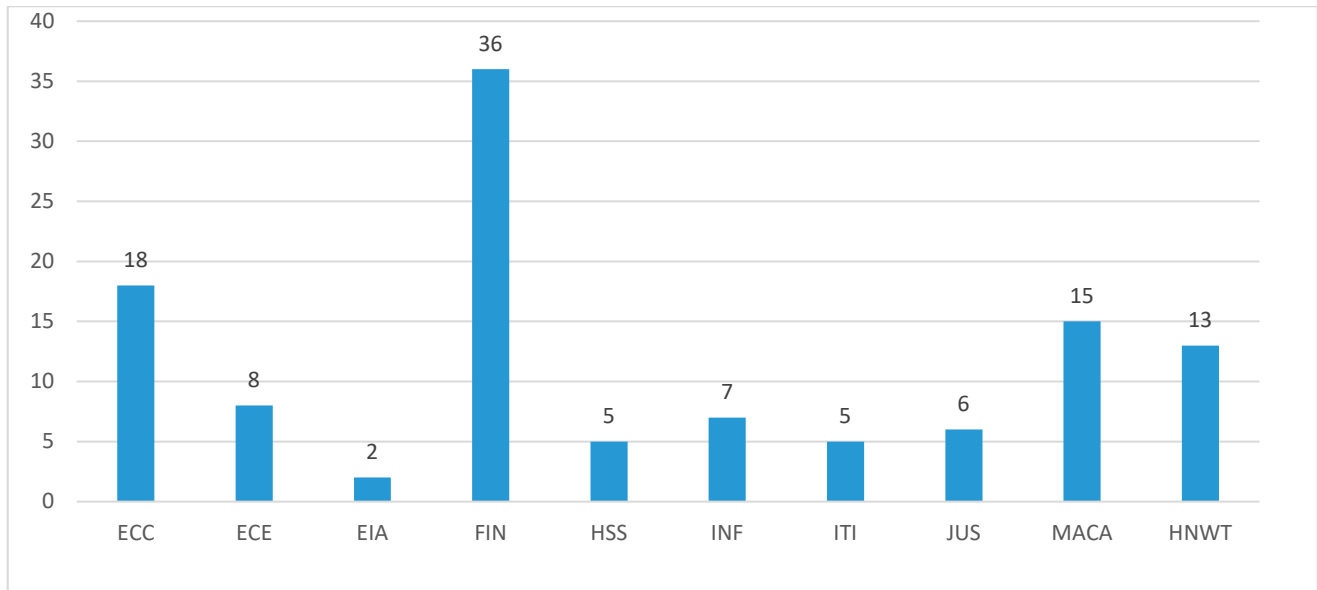


Graph 2: Number of access requests received by public bodies in 2024-25
 (public bodies not shown received 0 ATIPPA requests*)



*Statistics were not received from Deh Cho Divisional Education Council.

Graph 3: Number of requests carried over within the GNWT APO in 2024-25



The GNWT APO carried over **115** old access requests from previous fiscal years while also receiving **143** new access requests in 2024-25. In this Annual Report data on closed requests includes requests that were received in previous fiscal years but were closed during the 2024-25 fiscal year. The GNWT APO closed **135** requests this fiscal year and many of these closed requests were carried over from previous years.

A pattern of a high number of backlogged requests has emerged since the conception of the centralized service in 2021. Carrying over a large backlog of requests each year has contributed to late responses to new requests received.

2.2 Request Types

There are two types of access requests for records that can be made under the ATIPPA:

- General requests – are those where information requested does not pertain to the person making the request. General requests commonly include information pertaining to contracts, programs and services, or decisions made by a department or other public body subject to the ATIPPA.
- Personal requests – are those where an individual (or their representative) is requesting access to their personal information that is held by a department or other public body subject to the ATIPPA.

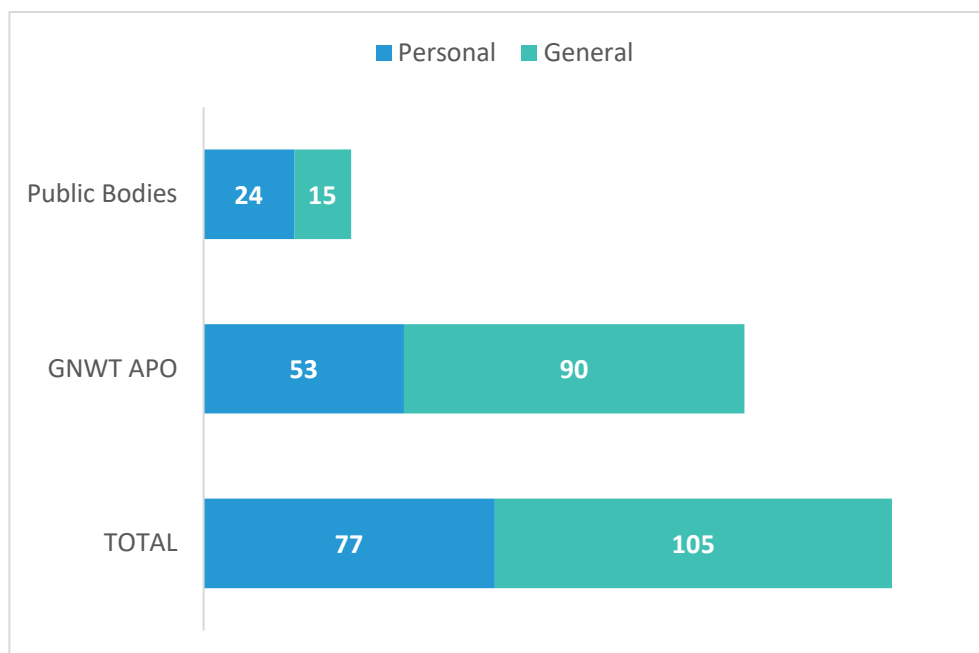
Table 1: Types of access requests received by the GNWT APO in 2024-25

Department	Personal	General
ECC	6	21
ECE	2	4
EIA	0	10
FIN	19	17
HSS	3	7
INF	0	8
ITI	1	4
JUS	13	8
MACA	9	8
HNWT	0	3
TOTAL	53	90

Table 2: Types of access requests received by the public bodies in 2024-25

Public Body	Personal	General
Aurora College	0	2
Sahtu Divisional Education Council	2	0
South Slave Divisional Education Council	4	0
YK District No. 1 Education Authority	5	0
NT Health and Social Services Authority	8	3
HR Health and Social Services Authority	0	2
Legal Aid Commission	1	0
Rental Office	0	1
Tlicho Community Services Agency	4	0
Workers' Safety and Compensation Commission	0	7
TOTAL	24	15

Graph 4: Type of access requests received by the GNWT APO and public bodies in 2025-25



In 2024-25, general requests made up 58% of the total number of requests received. In the past, personal information requests typically outnumbered general requests received, however, a shift has been identified in recent years. The rising proportion of general requests received may reflect greater public awareness and understanding of the public's right under the ATIPPA to request information held by the government. In 2021, the initial application fee for general information access requests was eliminated, which may also be a factor contributing to the increase in general access requests.

2.3 Request Processing Times

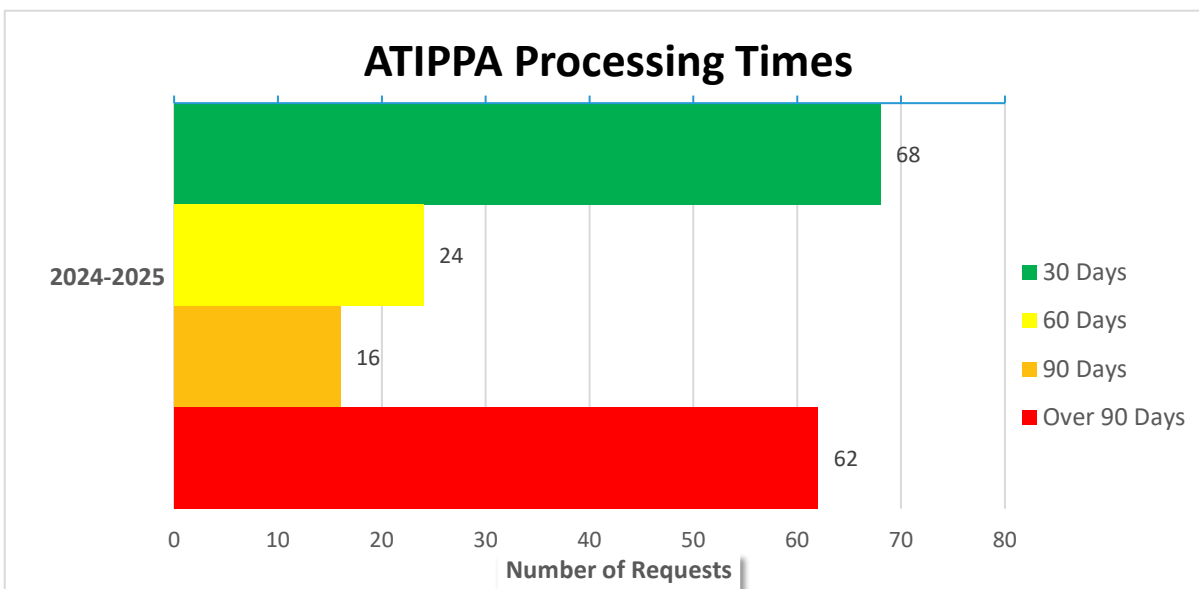
The ATIPPA establishes a legislative timeframe of 20 business days from receipt of a request for departments and public bodies to process access to information requests. There are exceptions to this timeframe, such as when a response extension is permitted by section 11(1) or when a further request for extension is granted by the Information and Privacy Commissioner. Exceptions to timeframes will be explored further below.

Please note, the data below does not necessarily indicate if a request has been processed late or beyond legislative timeframes. The data is also specific to calendar days and not business days, which are primarily used within the legislation.

Table 3: Request processing time totals of the GNWT APO and public bodies in 2024-25

	Within 30 days	31 to 60 days	61 to 90 days	Over 90 days
GNWT APO	43	18	15	59
Public Bodies	25	6	1	3
TOTAL	68	24	16	62

Graph 5: Access request processing times of the GNWT APO and public bodies in 2024-25



Under certain circumstances under section 11 of the ATIPPA, departments and public bodies may ask for a time extension to process an access request if the request is too vague, if it includes a large volume of records, if consultation with public bodies or a third party is required, or if a third party requests a review by the Information and Privacy Commissioner. Data in relation to time extensions is indicated below. In the fiscal year 2024-25, the most frequently claimed reason for requesting a time extension was due to the large volume of records associated with the access requests.

Graph 6: Justifications relied on for a time extension for the GNWT APO and public bodies in 2024-25

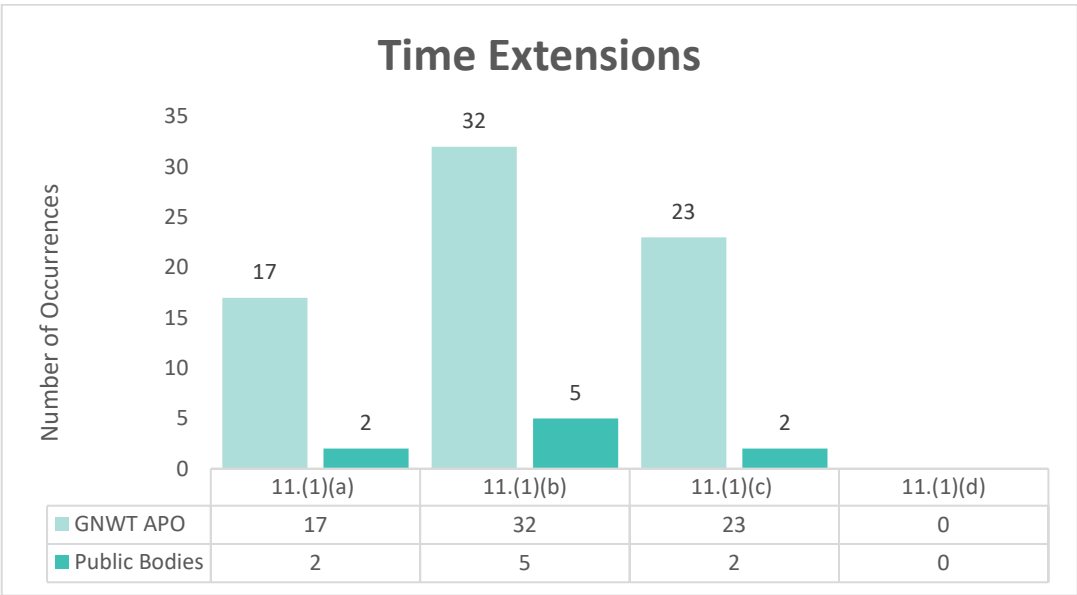


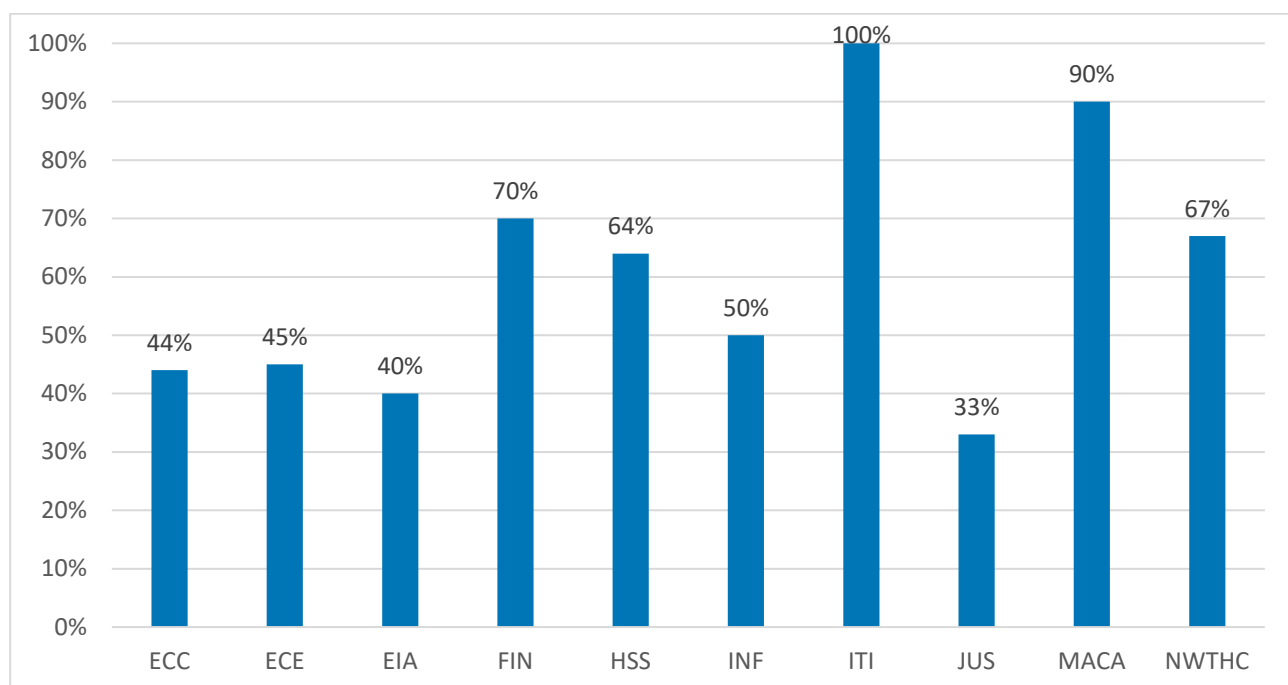
Table 4: Justifications relied on for a time extension for the GNWT APO and public bodies in 2024-25

Section	Number of Occurrences
11.(1)(a) the applicant does not give enough detail to enable the public body to identify a requested record.	19
11.(1)(b) a large number of records is requested or must be searched to identify the requested record and meeting the time limit would unreasonably interfere with the operations of the public body.	37
11.(1)(c) more time is needed to consult with a third party or another public body before the head can decide whether or not the applicant is entitled under this Act to access to a requested record.	25
11.(1)(d) a third party asks for a review under subsection 28(2).	0
TOTAL	81

The GNWT APO tracks requests that are considered late, meaning there was no legislative

authority under section 11 under the ATIPPA to exceed the legislative timeframes for response. In 2024-25, 60% of access requests processed on behalf of departments by the GNWT APO that were closed during that year were classified as being late. Late responses can be attributed to requests growing in complexity, which requires more effort, time and expert knowledge of the ATIPPA, as well as a strong records management program within departments and public bodies.

Graph 7: Percentage of late responses to access requests closed by the GNWT APO in 2024-25



2.4 Fees Charged

Section 5(3) of the ATIPPA provides authority for a fee to be charged for the processing of access requests. There are two different fee structures set out in the ATIPP Regulations: one for accessing general information under section 11 and the other for accessing personal information under section 12 (detailed in Schedule B of the Regulations). However, the head of a department or other public body may excuse an applicant from paying all or part of a fee if, in the opinion of the head, the applicant cannot afford the payment or, for any other reason, it is fair to excuse payment.

For access requests closed in 2024-25, \$519.58 was charged in fees for general requests and \$1,5424.79 was waived. As noted above, fees may be waived for various reasons, though delays in processing requests were a main contributor to fee waivers in 2024-25.

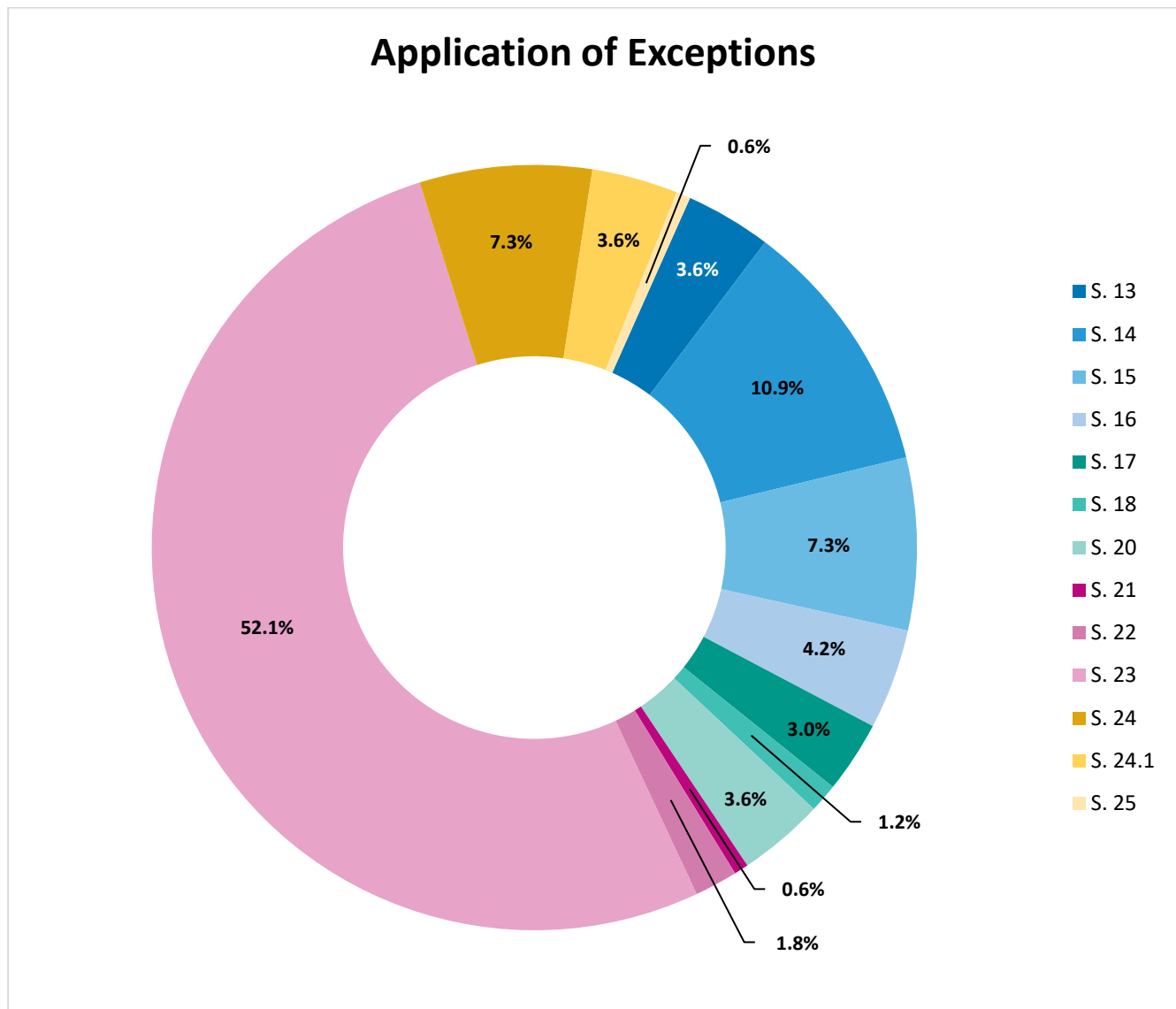
2.5 Application of Exceptions

When processing an access to information request, departments and public bodies are required to complete a line-by-line review of all records pertaining to the request. During the line-by-line review, portions of the information may be blacked out (severed or redacted). This is to ensure that information which falls under the limited mandatory or discretionary exceptions to access set out in sections 13 to 25 of the ATIPPA is protected. The table and graph below describe the types of exceptions that may be applied and how often each one was used in 2024-25. The mandatory exception to access section 23 (*personal privacy of third party*) was the most frequently applied exception to the release of information under the ATIPPA in 2024-25. The discretionary exception to access section 14 (*advice from officials*) was the second most frequently applied exception to access under the ATIPPA in 2024-25. Section 15 (*privileged information*) and section 24 (*business interests of third party*) were tied in third place for most frequently used provisions.

Table 5: Exceptions to access sections applied by the GNWT APO and public bodies in 2024-25

Section Number	Specific Exception Applied	Number of Occurrences
13	Executive Council Records	6
14	Disclosure of Advice from Officials	18
15	Privileged Information	12
16	Disclosure Prejudicial to Intergovernmental Relations	7
17	Economic and Other Interests of Public Bodies	5
18	Testing Procedures, Tests and Audits	2
19	Disclosure Harmful to Conservation	0
20	Disclosure Prejudicial to Law Enforcement	6
21	Disclosure Harmful to Individual or Public Safety	1
22	Confidential Evaluations	3
23	Personal Privacy of Third Party	86
24	Business Interests of Third Party	12
24.1	Disclosure of Labour Relations Information	6
24.2	Information for Workplace Investigation	0
25	Information Otherwise Available to the Public	1
TOTAL		165

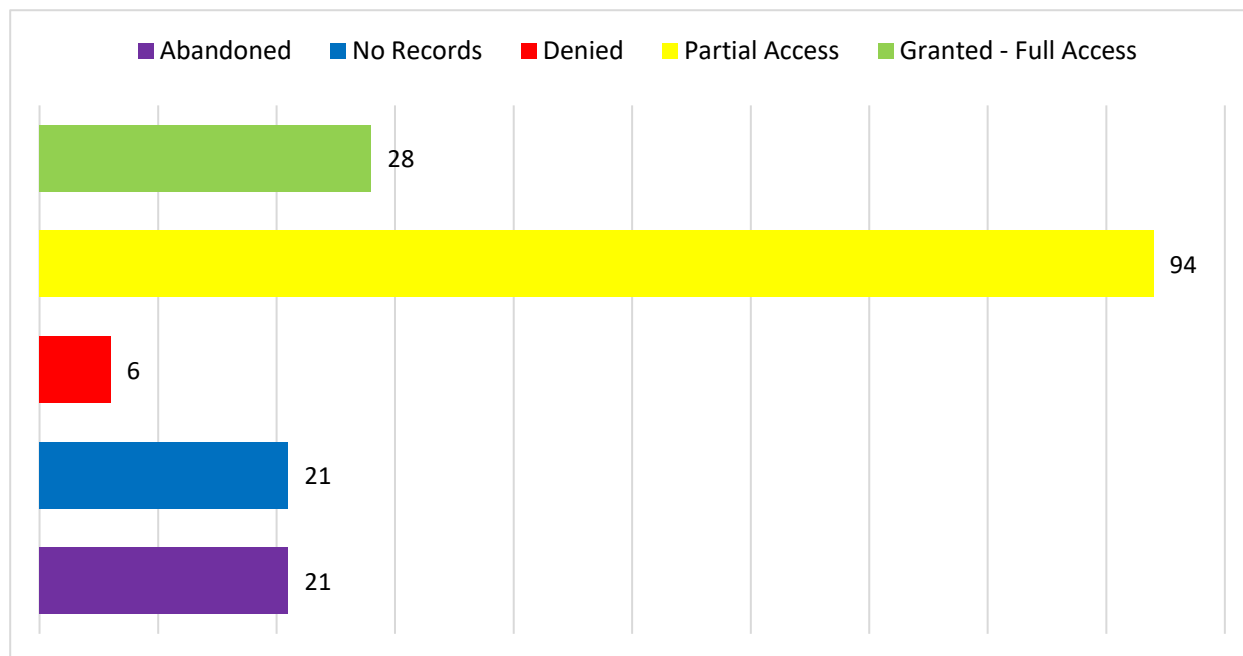
Graph 8: Percentage of exceptions applied by the GNWT APO and public bodies



2.6 Outcome of Access Requests

An access request under the ATIPPA is completed once the applicable department or public body has conducted a line-by-line review of all information pertaining to the request, has applied any appropriate exceptions, and has provided the response to the applicant who submitted the request. The application of exceptions can result in different outcomes in terms of what records are disclosed, which are classified as either granted (full access), partial access, denied (no access), no records, or abandoned by applicant. As noted, most of the time, a partial access to records is provided.

Graph 9: Outcome of requests closed by GNWT departments and public bodies in 2024-25



3.0 Privacy Impact Assessment Data

Privacy Impact Assessments (PIAs) and privacy audits are key components of an effective privacy framework and ensure programs and services offered by departments and public bodies meet the requirements of the ATIPPA. PIAs are required under Section 42.1 of the ATIPPA to be completed during the development of a proposed enactment, system, project, program or service that involves the collection, use or disclosure of personal information.

PIAs are the principal tool used in Canada and internationally to ensure that programs and applications are compliant with privacy laws. PIAs are one of the most important tools available to government for managing privacy risks. The table that follows illustrates the number of PIAs completed in 2024-25. Overall, 23 PIAs were completed by GNWT departments and the public bodies in 2024-25.

Table 6: Number of PIAs completed by GNWT departments and public bodies in 2024-25

GNWT Dept or Public Body	Number of PIAs
ECC	1
ECE	1
EIA	3
FIN	3
INF	2
ITI	3
MACA	2
HNWT	1
Total for Departments	16
Aurora College	2
HR Health And Social Services Authority	4
Workers' Safety and Compensation Commission	1
Total for Public Bodies	7
TOTAL FOR PUBLIC SERVICE	23

4.0 Information and Privacy Commissioner Reviews

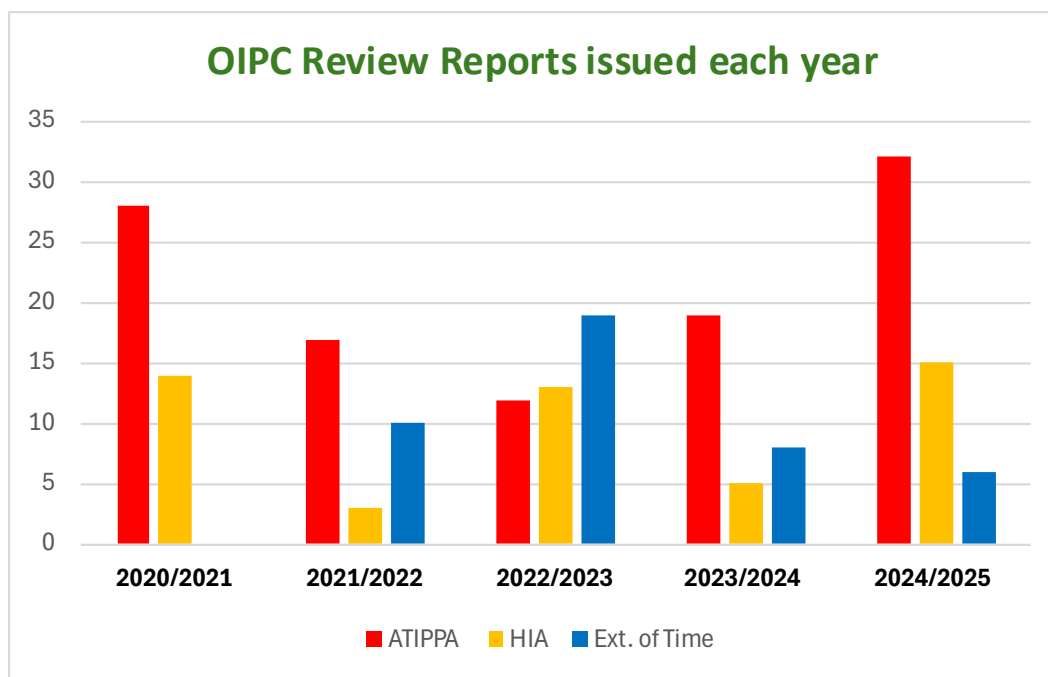
An applicant who is unsatisfied with the response to their access to information request may request that the Northwest Territories Office of the Information and Privacy Commissioner (OIPC) review the decision made by the department or public body. This includes, but is not limited to, reviews for denying or limiting access to records, time extensions, and fees. We can refer to these types of reviews as access reviews.

An individual can also ask the OIPC to complete a review if they feel a department or public body has collected, used, or disclosed their personal information improperly. These types of reviews are referred to as privacy reviews. The Northwest Territories Information and Privacy Commissioner has both order and recommendation making powers. Information on the OIPC can be found at <https://oipc-nt.ca/>.

To locate reviews completed by the Information and Privacy Commissioner, please visit: <http://www.canlii.org/en/nt/ntipc/>. The Information and Privacy Commissioner also highlights specific reviews and makes privacy and access related recommendations to the Standing Committee on Government Operations in his annual reports, which can be found

under the Tabled Documents section of the Northwest Territories Legislative Assembly website at <http://www.assembly.gov.nt.ca/documents-proceedings/taled-documents>.

Graph 10 – OIPC Review Reports issued each year



The graph above has been extracted from the OIPC’s “Annual Report 2024/2025”. The red 2024-25 data highlights an increase in ATIPPA reviews handled by the OIPC. The link to the complete OIPC’s Annual Report can found here: <https://oipc-nt.ca/wp-content/uploads/2025/08/Annual-Report-2024-2025.pdf>

5.0 ATIPPA Resources

- The GNWT Department of Justice Access to Information and Protection of Privacy webpage provides information on the ATIPPA and access requests available at: <https://www.justice.gov.nt.ca/en/access-to-information-held-by-public-bodies/>
- The GNWT Access and Privacy Guide provides useful information for those seeking to submit an access request available at: <https://www.justice.gov.nt.ca/en/files/atipp/contacts/Access%20and%20Privacy%20Guide%20%28july%202021%29.pdf?t1614981909993>
- The GNWT Access and Privacy Contacts and Coordinators Directory provides contact information for those seeking to submit an access request available at:

<https://www.justice.gov.nt.ca/content/uploads/2025/09/Access-and-Privacy-Contacts-Directory-September-2025.pdf>

- The Department of Justice Online Access and Privacy Awareness Course is available at:

<https://www.justice.gov.nt.ca/en/2023/09/access-to-information-and-protection-of-privacy-general-awareness-course-now-available-online/>

If you have any questions about the Annual Report, please contact:

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