ANNUAL REPORT ON THE *ACCESS TO INFORMATION ACT*

2025-2026

For Non-Public Property and
Staff of the Non-Public Funds, Canadian Forces

Canada

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1. Introduction

1.1 The *Access to Information Act* (R.S.C., 1985, c. A-1)

The *Access to Information Act*[1] (the "Act") was proclaimed on July 1, 1983. The Act was amended as a result of the Royal Assent of Bill C-58 on June 21, 2019.

The Act gives Canadian citizens, permanent residents, as well as individuals and corporations present in Canada, a right of access to information contained in government records subject to certain specific and limited exceptions.

Section 94 of the Act requires that the head of every federal government institution prepare, for submission to Parliament, an annual report on the administration of the Act within their institution during each fiscal year.

This annual report provides a summary of the management and administration of the Act within Canadian Forces Morale and Welfare Services (CFMWS) for the fiscal year 2025-2026, for Non-Public Property (NPP), and for the Staff of the Non-Public Funds, Canadian Forces.

1.2 Background of the Canadian Forces Morale and Welfare Services

The *National Defence Act* (Sections 2 and 38 – 41) vests Non-Public Property (NPP) with the Chief of the Defence Staff (CDS), Base / Wing Commanders and Unit Commanding Officers to be used for the benefit of serving and former Canadian Armed Forces (CAF) personnel and their families.

The CDS has delegated the Managing Director of NPP with responsibility for the daily administration of NPP. Under the present administrative structure, the Managing Director of NPP responsibility is borne by the Chief Executive Officer (CEO) of the Staff of the Non-Public Funds, Canadian Forces.

The collective NPP activities, including those of the Staff of the Non-Public Funds, Canadian Forces and those programs and services that NPP provides to the CAF via service level agreements or other arrangements, are managed by the administrative construct known as the Canadian Forces Morale and Welfare Services (CFMWS).

CFMWS currently employs over 4,000 people as "Staff of the Non-Public Funds, Canadian Forces", a Separate Agency under Schedule V of the *Financial Administration Act* of Canada. The institution does not have any wholly owned subsidiaries.

1.3 Mandate of the Canadian Forces Morale and Welfare Services

CFMWS operates under a social enterprise business model, with the fundamental objective of creating positive value for serving and former CAF personnel and their families. Responsive to the changing needs of the CAF, our programs and services build their self-reliance, resilience and readiness by enhancing their mental, social, physical and financial wellbeing.

Working on behalf of the CDS and under the authority of the Minister of National Defence (MND), CFMWS is a trusted partner in the Defence enterprise, operating under the Non-Public Property framework, expending funds through a unique operating model that creates real value for the CAF Community.

[1] *Access to Information Act* (Revised Statutes of Canada, 1985, Chapter A-1).

CFMWS operates through the following divisions:

- Personnel Support Programs (PSP),
- Military Family Services (MFS) – includes Support Our Troops,
- CANEX,
- SISIP Financial,
- Corporate Services,
- Finance,
- Information Services, and
- Human Resources.

2. Structure of the Access to Information and Privacy Program

The National Manager, Access to Information and Privacy (NM ATIP) is responsible for fulfilling the provisions of the *Access to Information Act* within CFMWS for NPP and the Staff of the Non-Public Funds, Canadian Forces. During the reporting period, the NM ATIP was the sole full-time employee in the ATIP Office. Additionally, the former NM ATIP, who left the organization in 2024, returned in a part-time capacity to support the program.

The NM ATIP reports to the Director, Corporate Services who, in turn, reports to the Chief Corporate Secretary. The NM ATIP administers the CFMWS ATIP Program, in accordance with the NPP ATIP designation order and the provisions of the Act, Regulations, directives, policies and guidelines.

Each division, which serves as an office of primary interest (OPI), has a point of contact to facilitate processing requests. There are twelve (12) OPI representatives responsible for coordinating the retrieval of records, providing guidance about the ATIP process, and ensuring timely responses from their respective division.

CFMWS is recognized as a government institution for the purpose of the Act and therefore subject to the proactive publication provisions outlined in Part 2, sections 82 to 84, which mandate the public disclosure of travel and hospitality expenses, and reports tabled in Parliament.

CFMWS has a decentralized approach to fulfilling its proactive publication responsibilities. Each Senior Executive is responsible for ensuring that their monthly travel and hospitality expense reports are prepared and submitted to communications services for publication, in accordance with sections 82 and 83 of the Act. For a breakdown of the positions responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see section 9 - Proactive Publication under Part 2 of the ATIA.

CFMWS was not a party to any service agreements under section 96 of the Act during the reporting period.

3. Delegation Order

Under section 3 of the Act, the Minister of National Defence (MND) is designated as the head of the institution. Pursuant to section 95, the Minister may delegate any of his powers, duties or functions under the Act by signing an order authorizing one or more officers or employees of the institution, who are at the appropriate level, to exercise or perform the powers, duties or functions of the head, specified in the order.

Within CFMWS, the NPP ATIP Delegation Order is based on a centralized process with the NM ATIP having full delegated authority under the Act. Full authority under the Act is also delegated to the Managing Director NPP / CEO, Staff of the Non-Public Funds, Canadian Forces, and the Vice President Corporate Services (now titled Chief Corporate Secretary) who is the functional authority for the ATIP program.

The NPP ATIP Delegation Order signed by the MND is attached at Annex A.

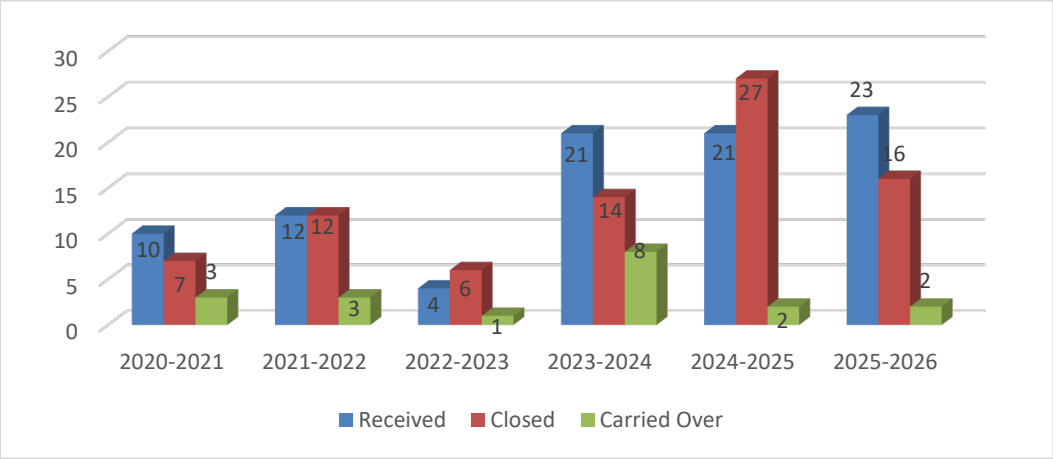
4. Performance

A key measure of performance under the *Access to Information Act* is the percentage of requests completed within legislative deadlines, reflecting an institution's ability to deliver timely access to information. In 2025-2026, CFMWS closed twelve (12) of sixteen (16) requests within the legislated timelines, representing a 75 percent compliance rate. The following section provides an overview of CFMWS' performance administering Part I of the ATIA for the fiscal year, as reflected in the 2025-2026 Statistical Report.

4.1 Formal Requests

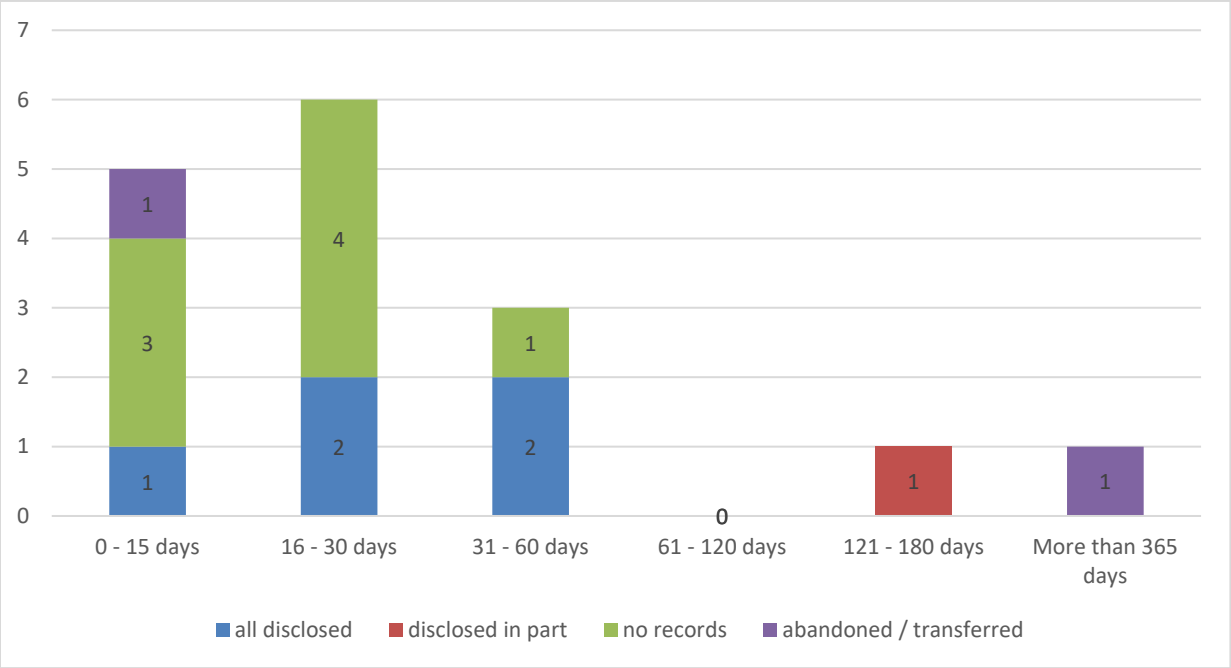
In addition to two (2) requests outstanding from the previous fiscal year, CFMWS received twenty-three (23) new access to information requests in 2025-2026. As noted in Chart I below, CFMWS began receiving more requests after enrolling in the ATIP Online Request Service in December 2022. This trend has continued.

Chart I – Volume of access to information requests



CFMWS completed sixteen (16) out of twenty-five (25) requests that were active during the reporting period. Of the sixteen completed requests, thirty-one percent (31%) were disclosed in full and less than one percent (.06%) was disclosed in part. Chart II shows the number of completed requests broken down by completion times and disposition.

Chart II – Completion times and disposition

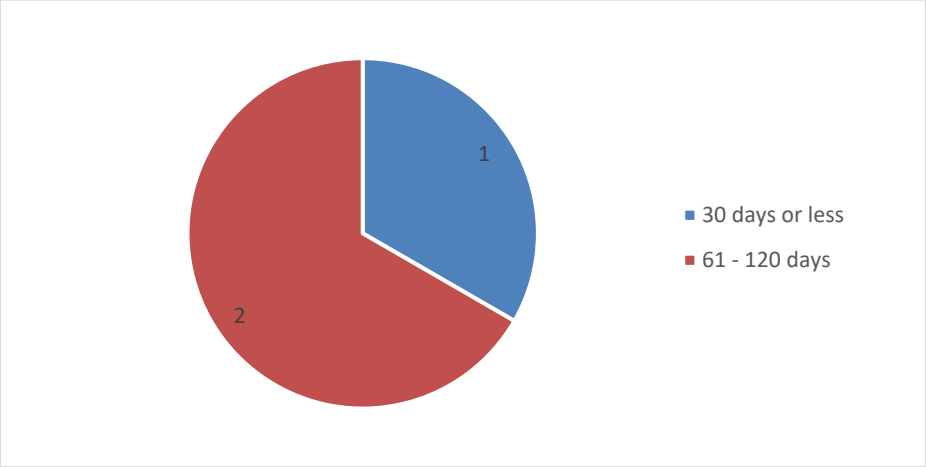


As of the last day of the reporting period, CFMWS had nine (9) active requests. One, received in 2025-26, was carried over beyond the legislated timeline. The other eight (8) were still within the legislated timelines.

4.2 Extensions

CFMWS required an extension to the legislative time limit for three (3) requests during the reporting period. Two extensions were necessary to undertake a consultation with another government institution. The third extension was necessary because the request was for a large volume of pages and processing them within the original time limit would have caused unreasonable interference with operations. The following chart shows a breakdown of the length of extensions.

Chart III – Length of Extensions



4.3 Consultations

CFMWS completed nine (9) consultations for other government institutions during the reporting period, eight (8) of which were received during the reporting period, and one that had been carried over, due to its volume. In total, the nine consultations resulted in the review of 1,258 pages. Three (3) consultations were completed within 1 – 15 days, four (4) were completed within 16 – 30 days and two (2) were completed within 31 – 60 days. No consultations were carried over to the next reporting period.

4.4 Complaints

During the 2025-2026 fiscal year, CFMWS received four (4) Notices of Intention to Investigate and Summaries of Complaint pursuant to section 32 of the Act from the Office of the Information Commissioner of Canada (OIC). In addition, two (2) Formal Representations were made pursuant to section 35. As of the last day of the reporting period, CFMWS had a total of five (5) active complaints.

5. Training and awareness

ATIP 101 training was delivered to senior executives, division heads, and Human Resources (HR) Directors during the fiscal year. In addition to this, NM ATIP provided informal briefings and one-on-one training to managers and employees involved in processing requests under the Act on an as-needed basis. No formal training was provided with respect to proactive publication under Part 2 of the Act.

6. Policies and procedures

CFMWS did not implement any new or revised policies, guidelines, or procedures during the reporting period.

7. Initiatives and Projects

In 2025, CFMWS introduced a new Records and Information Management System (RIMS) based on Microsoft SharePoint. RIMS supports the effective management of information assets throughout their lifecycle, from creation and use to storage, retention, and disposition, while also providing enhanced search capabilities. During the fiscal year, four divisions transitioned to the new system, and migration efforts remain ongoing.

CFMWS also strengthened its information governance framework by implementing a revised Information Asset Management Policy and a new Information Asset Protection Standard. Together, these initiatives enhance the organization's ability to manage, protect, and retrieve information efficiently, thereby supporting timely and effective access to information.

8. Summary of Key Issues and Actions Taken on Complaints

CFMWS received four (4) complaints regarding unreasonable extensions during the fiscal year. The extensions were necessary because the institution experienced a sudden increase in the number of submitted requests and processing them within the statutory time limit would have significantly interfered with the operations of the ATIP program as well as the operations of the offices of primary interest. It was also determined that consultations were necessary for all four requests. On one complaint, CFMWS submitted representations under section 35 defending the length and necessity of the extension. After a preliminary assessment from the investigator, the requestor agreed to reduce the scope of the request, and the institution was able to reduce the length of the extension accordingly. The four extension complaints were still ongoing at the end of the reporting period.

CFMWS had one outstanding complaint from the 2023-24 reporting period. The complaint alleged that information had been improperly withheld pursuant to subsection 19(1) of the Act. The records in question involved raw data about victims of domestic violence. CFMWS submitted representations under section 35 defending its position to exempt personal information. The complaint was ongoing at the end of the 2025-2026 fiscal year.

9. Proactive Publication under Part 2 of the ATIA

The following table provides an overview of CFMWS' performance under Part 2 of the ATIA.

Table I – Proactive Publication Requirements Table

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines	Link to web page where published
Apply to all Government Institutions as defined in section 3 of the *Access to Information Act*						
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Y	Senior Executive and Executive Assistant for each division	N/A*	https://cfmws.ca/about-us/public-reporting/proactive-disclosure
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Senior Executive and Executive Assistant for each division	N/A*	https://cfmws.ca/about-us/public-reporting/proactive-disclosure
Reports tabled in Parliament	84	Within 30 days after tabling	Y	National Manager – ATIP Programs	100%	https://cfmws.ca/about-us/information-privacy

* CFMWS does not track the date reports are published.

The Executive Assistant assigned to each Senior Executive is tasked with preparing and submitting the monthly travel and hospitality reports to the Website Manager for publication. CFMWS does not track the date reports are published relative to the legislative timeline, however Financial Services maintains a dashboard that tracks the percentage of expenditures that are published in each fiscal quarter. During the fiscal year, CFMWS reported 70 percent of travel expenses and 46 percent of hospitality expenses.

10. Monitoring Compliance

During the 2025-26 fiscal year, the percentage of requests completed within legislated timelines declined from 96.3% to 75.0%. This decrease resulted from a significant surge in requests over a short period, combined with reduced staffing capacity. Overall performance and related issues are reported to the Chief Corporate Secretary.

CFMWS did not monitor the time taken to process access to information requests during the reporting period.

The NPP General Conditions template includes a reference to CFMWS' obligations under the ATIA. Other contracts, agreements, and arrangements that involve records under the control of CFMWS are reviewed by the NM ATIP as required.

As discussed in the previous section, Financial Services monitors the accuracy and completeness of travel and hospitality reports proactively published under Part 2 of the ATIA via a dashboard. The results are reported to the Audit Committee on a quarterly basis.

Annex A: Delegation Order

Pursuant to section 73 of the *Access to Information Act* and the *Privacy Act* (the "Acts"), The Minister of National Defence, as the head of a government institution under these Acts, hereby designates the persons holding the following positions or the persons occupying those positions on an acting basis, to exercise all of the powers and perform the duties and functions of the head of a government institution under these Acts concerning non-public property and related or assigned services, programs and operations*:

(a) The Managing Director NPP/CEO of the Staff of the Non-Public Funds, Canadian Forces;

(b) The Chief of Staff and Vice President Corporate Services; and

(c) The National Manager Access to Information and Privacy Program

*For greater certainty, this includes all non-public property vested in the commanders of units and other elements and in the Chief of the Defence Staff established under section 38 to 41 of the National Defence Act; all activities of the Staff of the Non-Public Funds, Canadian Forces; and all non-public property services, programs and operations including those public Alternative Service Delivery functions assigned to be executed under the non-public property framework.

Approved



The Hon. Harjit S. Sajjan, PC, OMM, MSM, CD, MP
Minister of National Defence

21 Feb 17
Date