TELEFILM CANADA

Annual Report on the *Access to Information Act*

2025/2026

July 3, 2026

Table of Contents

2025/2026 Annual Report on the *Access to Information Act* **3**

1 Organization **3**

1.1 ATIP Files 3

1.2 Part 2 – Proactive Publication 4

2 Findings **4**

3 Proactive Publication under Part 2 of the ATIA **5**

3.1 Travel and Hospitality Expenses 5

3.2 Reports Tabled in Parliament 5

3.3 Proactive Publication Requirements Table 6

4 Activities in Support of Access to Information and Compliance Monitoring **9**

5 Training and Awareness **10**

Schedule "A"

Copy of the Delegation Order **11**

2025/2026 Annual Report on the *Access to Information Act*

Presentation of the 2025/2026 Annual Report

In compliance with section 94 of the *Access to Information Act* (hereinafter also referred to as the "Act" or the "ATIA"), this annual report is prepared by Telefilm Canada (hereinafter also referred to as the "Corporation") and tabled in Parliament by the Minister of Canadian Identity and Culture and Minister responsible for Official Languages.

Purpose of the *Access to Information Act*

The Act gives Canadian citizens, permanent residents and any person or corporation present in Canada a right to access records of government institutions that are subject to the Act. This right is nevertheless subject to exceptions specified in the Act. Furthermore, decisions made by federal institutions on the disclosure of information are subject to independent review by the Office of the Information Commissioner of Canada (the "OIC") as well as by the federal courts.

Mandate of the Institution

Telefilm Canada is a federal cultural institution dedicated to the development and promotion of the Canadian audiovisual industry. Telefilm Canada provides financial support to the private sector to create distinctively Canadian productions that appeal to domestic and international audiences. The Corporation also administers the funding programs of the Canada Media Fund.

Non-operational Subsidiaries

The Corporation did not have any non-operational ("paper") subsidiaries during this reporting period.

1 Organization

1.1 ATIP[1] Files

The Vice President, Legal Services, Information Technologies and Corporate Secretary, is the designated Access to Information and Privacy Coordinator (the "Coordinator") for the Corporation. Requests filed under the Act are normally referred to designated Legal Services staff, consisting of 4 legal counsels and a paralegal, who ensure the coordination of filed requests as well as all aspects of their processing, including final decisions issued to requesters (the "designated staff"). Furthermore, the designated staff are also responsible for dealing with any other issues related to access to information within the Corporation. Monitoring of the time required to process requests filed under the Act is conducted periodically, including in the course of ad hoc meetings attended by the Coordinator. The designated staff, as well as the Coordinator, are based in the Quebec region where the Corporation's head office is located.

Telefilm Canada did not use the services of ATIP consultants, and was not a party to any services agreements within the meaning of section 96 of the Act during fiscal 2025/2026.

[1] ATIP: Access to Information and Privacy

1.2 Part 2 – Proactive Publication

For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see the section "Proactive Publication under Part 2 of the ATIA", below.

2 Findings

In 2025/2026, the number of access to information requests decreased compared to the previous year. Telefilm Canada received 4 formal requests, which is 4 fewer than in the previous financial year (2024/2025) and represents a 50% drop. This trend appears to fluctuate over time, as 8 formal requests were received in 2022/2023, 26 in 2023/2024 and 8 during the 2024/2025 period.

Regarding the number of formal access to information requests processed during fiscal 2025/2026, Telefilm Canada closed 5 requests, 4 of which were received during the reporting period and one carried forward from the previous reporting period (2024–2025). Of these processed requests, 2 (40%) resulted in full disclosure of records, 2 (40%) in partial disclosure, and for one request (20%), no records existed. The number of formal requests processed fluctuates over time, largely depending on the number of new requests received during a given reporting period: 7, 31 and 8 requests were completed by Telefilm Canada during the 2024/2025, 2023/2024 and 2022/2023 fiscal years, respectively. No requests were carried forward to the next reporting period.

As for the number of informal requests, it decreased from 25 to a single request, representing a 96% reduction from fiscal 2024/2025. This trend also seems to fluctuate over time, as Telefilm Canada received 25 informal requests in 2024/2025, 7 in 2023/2024, and 2 in 2022/2023.

The single informal request processed during the fiscal year covered by this report was to obtain a release package featured on the list of completed access to information requests published on "open.canada.ca".

During the 2025/2026 reporting period, the Corporation processed 2 consultation requests, one received from another federal institution, and the other from an organization outside the federal public sector. Both consultation requests (100%) were completed within 0 to 15 days. This trend also appears to fluctuate over time, with no consultation requests received in 2024/2025, compared to 3 requests in 2023/2024 and 2 requests in 2022/2023.

Regarding the formal access requests received in 2025/2026, some sought information related to the internal management of the Corporation's programs, activities and operations, while others focused more on specific project files.

None of the 5 requests completed during the 2025/2026 period were closed past the legislated timelines. The processing time for these requests ranged between 16 to 30 days (3 requests or 60%), 31 to 60 days (1 request or 20%), and 61 to 120 days (1 request or 20%), with the majority (3 requests or 60%) having been processed in 30 days or less. Two of these requests required an extension of the processing time. These extensions were necessary due to, among other things, the volume of documents covered and the more complex nature of the information at issue.

Aside from the ad hoc meetings previously mentioned under the “Organization” section of this report, no additional monitoring measures were required during the 2025/2026 period with respect to the time needed to process requests filed under the Act.

No new complaints were forwarded to our institution by the OIC. A single complaint involving the Corporation remained active during fiscal 2025/2026. This complaint, which was received during the previous reporting period (2024/2025), relates to certain exemptions invoked under the Act. Apart from providing the Corporation’s representations and responding to follow-up questions, this complaint did not require any specific action from our institution while remaining under review by the OIC during the reporting period.

During the 2025/2026 period, no new or revised access to information policies, guidelines or procedures have been put in place by the Corporation.

3 Proactive Publication under Part 2 of the ATIA

As mentioned in the “Organization” section of this report, Telefilm Canada is a government institution, including for the purposes of Part 2 of the Act. As such, the Corporation is subject to the proactive publication requirements for travel and hospitality expenses (sections 82 and 83 of the Act), as well as reports tabled in Parliament (section 84). All (100%) of the proactive publication requirements due during the 2025/2026 period were published within the legislated timelines.

3.1 Travel and Hospitality Expenses

The Finance department is responsible for these publications. An accounting technician initially extracts the information from financial systems and prepares the disclosure according to established procedures and policies. The disclosure is then reviewed by an analyst, who in turn sends the draft disclosure to the administrative assistants in all the departments concerned, for content review and confirmation of the completeness and accuracy of the information presented. Once the confirmations have been obtained from the various departments, the analyst performs the final checks to ensure compliance of the disclosure. A comprehensive review of the disclosure is performed by Finance management. Following completion of that review, the Finance sector proceeds with publication on the website.

In order to meet the proactive publication requirements related to travel and hospitality expenses, the Finance department has defined a control framework that is articulated through the implementation of documented procedures and checklists. These procedures, which are available to those who prepare and review the proactively published expenses, are related to the reconciliation of paid expense reports in our financial system with approved expense reports in the Shared Travel System (the “STS”). The procedures also cover travel and hospitality transactions outside of the STS that must nevertheless be included in the proactive publication. Checklists are maintained and initialled by both the preparer and the reviewer to ensure that the information disclosed is accurate and complete.

3.2 Reports Tabled in Parliament

The reports tabled in Parliament on behalf of Telefilm Canada include the annual reports on the administration of the *Access to Information Act* and the *Privacy Act* (the “ATIP Annual Reports”), as well as the annual report (including the related Auditor General’s report) of the Corporation filed

pursuant to the *Telefilm Canada Act* (the "Annual Corporate Report"). The Coordinator assigns to one of the designated staff in Legal Services – usually the paralegal – the responsibility for ensuring the publication of the ATIP Annual Reports within the established time limits. When the tabling of the ATIP Annual Reports in Parliament is confirmed by a review of relevant parliamentary journals, the paralegal advises in a timely manner those responsible for digital communications within the Communications subsector to proceed with publication on the website. In addition, the Annual Corporate Report is the responsibility of the Communications and Governmental Affairs sector. Once the tabling of the Annual Corporate Report in Parliament has been confirmed by the Governmental Affairs subsector, the Interim Senior Director – Communications and Governmental Affairs instructs her digital communications team to proceed with publication on the website.

Aside from the processes described above, no specific procedures or systems were required in order to meet the publication requirements for reports tabled in Parliament within the timeline set out under the Act.

3.3 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	Yes	Finance	100%	**Telefilm:** Proactive disclosure **Gov. of Canada:** Travel expenses
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Yes	Finance	100%	**Telefilm:** Proactive disclosure **Gov. of Canada:** Hospitality expenses
Reports tabled in Parliament	84	Within 30 days after tabling	Yes	Legal Services	100%	**Telefilm:** ATIA reports Privacy Act reports Annual reports **Gov. of Canada:** Reports tabled in Parliament
Apply to government entities or Departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the *Financial Administration Act*						
Contracts over $10,000	86	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	No			

Grants & Contributions over $25,000	87	Within 30 days after the quarter	No			
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	No			
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	No			
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	No			
Applies to government institutions that are departments named in Schedule I to the *Financial Administration Act* 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)						
Reclassification of positions	85	Within 30 days after the quarter	No			
Apply to Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office)						
Packages of briefing materials prepared by	74(a)	Within 120 days after appointment	No			

a government institution for new or incoming ministers						
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	No			
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 Common in June and December	No			
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	No			

Travel Expenses	75	Within 30 days after the end of the month of reimbursement	No			
Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	No			
Contracts over $10,000	77	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	No			
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	No			

4 Activities in Support of Access to Information and Compliance Monitoring

Telefilm Canada maintains practices aimed at providing its clients and the general public with as much material and documents as can be made available legally while respecting the Corporation's client confidentiality guidelines, without requiring a formal access request under the Act or, whenever possible, without even opening an informal request file. As well, detailed reports on the Corporation's activities and expenditures are periodically published online, in addition to the information required under the proactive publication requirements Telefilm Canada is subject to under Part 2 of the Act.

In addition to the above, Telefilm Canada also carries out other activities to monitor compliance with the Act and related directives issued by the Treasury Board Secretariat. These include, among others:

- Using technological tools, including the *ATIP Online Access Management Tool* made available by the Treasury Board Secretariat, to help track the processing of requests made under the Act and responses issued thereto.

- Monitoring of the time required to process requests made under the Act, conducted periodically, including through ad hoc meetings attended by the Coordinator and designated Legal Services staff who handle access requests.

- Determining, as part of the designated Legal Services staff's processing of each request made under the Act, whether inter-institutional consultation is necessary for the proper exercise of discretion not to disclose information, or required in relation to the disclosure of potentially sensitive information. Where appropriate, designated Legal Services staff will inform the Coordinator as part of their regular discussions with the latter.

- Systematically consulting designated Legal Services staff when developing templates as well as reviewing, on a timely basis, draft contracts, agreements and arrangements, thereby ensuring the inclusion of appropriate provisions in support of the public's right of access to information including, among others, the applicability of the *Access to Information Act* and the preliminary granting to the Corporation of authorizations for the disclosure of information consistent with our organization's proactive publication practices. The Coordinator is informed of these consultations in the course of regular meetings with his staff.

- Implementing documented procedures and checklists within the Finance department, as described in the "Proactive Publication under Part 2 of the ATIA" section of this report, to help the Corporation ensure the accuracy and completeness of proactively published information and compliance with applicable reporting requirements. This compliance framework is in place on an ongoing basis, and the Director, Finance, follows up on a monthly basis at the end of the reporting period to ensure that publication has been completed.

5 Training and Awareness

During the 2025/2026 reporting period, Legal Services delivered live virtual training sessions to 22 new employees, among other things to raise awareness of key access to information principles, Telefilm's legal obligations in this area, and the responsibilities arising therefrom. Legal Services also responded on a regular basis to questions and requests for guidance from the Corporation's employees and managers regarding access to information.

In addition, designated Legal Services staff who have functional or delegated responsibilities for the administration of the Act[2] receive individualized support, including in the context of request processing or analysis of questions related to access to information. This support takes the form of focused discussions and ad hoc peer exchanges aimed at deepening their understanding of certain aspects of the Act, including, among others, extensions, exemptions and exclusions, reporting obligations to Parliament, and the role of agents of Parliament, including the OIC. Designated staff also have access to additional tools made available to ATIP practitioners by the Treasury Board Secretariat.

[2] See the "Organization" section of this report.

Schedule “A”

Copy of the Delegation Order

TELEFILM CANADA PARTNER OF CHOICE

Canada

MEMO

TO: Sébastien Pigeon, Vice President, Legal Services and Corporate Secretary

FROM: Julie Roy, Executive Director and CEO

DATE: May 27, 2025

SUBJECT: Delegation of Powers, Duties and Functions under the *Access to Information Act* and the *Privacy Act*.

This is to confirm in writing that effective March 10, 2025 I designated, pursuant to sections 95(1) of the *Access to Information Act* (the **"ATIA"**) and 73(1) of the *Privacy Act*, the person holding the position of Vice President, Legal Services and Corporate Secretary (the **"ATIP Coordinator"**), to exercise and perform all the powers, duties and functions of the Executive Director and CEO as head of a federal institution, namely Telefilm Canada, under the ATIA and the *Privacy Act*, except with regards to access to information requests and requests for personal information pertaining to a vice-president of Telefilm Canada's Management Committee. These latter requests are the exclusive responsibility of the Executive Director and CEO and must therefore be sent to her, without delay, for processing and decision.

In addition, as of March 10, 2025, I have delegated to the persons holding the positions of Associate Director, Legal Services and Information Management, Legal Counsels, as well as Paralegal assigned to handling matters related to the application of the ATIA and the *Privacy Act*, the powers, duties and functions required to assist the ATIP Coordinator in exercising the powers, duties and functions of the Executive Director and CEO under these Acts. This includes, among other things, the processing of access to information requests and personal information requests, subject to the same exception set out in the preceding paragraph.

This revokes the delegation of powers, duties and functions under the ATIA and the *Privacy Act* dated January 17, 2025.

Any proposed changes to the authority and procedure hereby granted shall require my prior written authorization.

Signed this 27th day of May, 2025.

Telefilm Canada

Julie Roy
Executive Director and CEO

360 St. Jacques Street, Suite 600, Montréal, Québec H2Y 1P5 T 1-800-567-0890 F 514-283-8447 telefilm.ca

telefilm.ca

TELEFILM CANADA

Canada