TRAINING PROGRAM

ACCESS TO INFORMATION AND PRIVACY - FEDERAL INSTITUTIONS (ATIPTP-IF)

THE PROGRAM IS AN ADDITIONAL PROFESSIONAL ASSET FOR YOU!

MODULE A
INTEGRATION TO THE ATIP ANALYST FUNCTION

MODULE B
PERFECTING THE PROCESSING OF ATIP REQUESTS AND COMPLAINTS

AAPI
Association des professionnels en accès à l'information et en protection de la vie privée
Association of Access to Information and Privacy Professionals

The certificate issued jointly by the Université de Montréal and the AAPI recognizes the training of each participant in the Program and constitutes for the employer a guarantee of the quality of the training received.

Université de Montréal

FEP

AAPI

Association des professionnels en accès à l'information et en protection de la vie privée

Association of Access to Information and Privacy Professionals

TRAINING PROGRAM

ACCESS TO INFORMATION AND PRIVACY - FEDERAL INSTITUTIONS (ATIPTP-IF)

THE PROGRAM THAT WILL MAKE A DIFFERENCE FOR INSTITUTIONS AND THEIR EMPLOYEES

Do your employees need to acquire knowledge of ATIP rules and best practices in relation to your institution's needs and realities? Do you want to support them in developing their skills to perform their ATIP analyst function?

In 2019, the AAPI released the French component **Integration to employment of federal analysts** for the first time. Based on feedback received from participants, observers and coordinators, the training program has been updated and enriched to better meet the specialized ATIP training needs.

THE PROGRAM HAS TWO STREAMS: STREAM 1 IS NOW AVAILABLE AND STREAM 2 IS CURRENTLY UNDER DEVELOPMENT.

Stream 1 — ATIP OPERATIONALIZATION

> *Module A –* Integration to the ATIP Analyst function, which is open to all new employees and those with less than two years experience in an ATIP Office

> *Module B –* Perfecting the processing of ATIP requests and complaints, which is open to all ATIP analysts with two or more years of experience

Stream 2 — GOVERNANCE AND PRIVACY MANAGEMENT

Stream 2 will be open to any analyst with more than two years of experience in governance and privacy management

Since 2021, AAPI has made available to federal institutions **Module A** of Stream 1 and since winter 2023, **Module B** of Stream 1.

THE PROGRAM THAT MEETS THE EXPECTATIONS OF ATIP ANALYSTS

- Mastering the issues in ATIP
- Acquiring an integrated and practical knowledge of the legal framework
- Implementing the acquired knowledge
- Exercising leadership in the implementation of ATIP best practices to optimize ATIP processes
- Exchange with other analysts on the ATIP function and practices

THE PROGRAM THAT OFFERS UNDENIABLE BENEFITS TO FEDERAL INSTITUTIONS

- Training their employees according to a flexible and adapted ATIP service offer
- Developing their skills in order to
- optimize the processes in these matters
- Accessing a knowledge base and bests practices in ATIP
- Gaining expertise in a specialized field

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OVERVIEW

DISSEMINATION OF THE COURSES IN MODULE A

Module A is 42 hours in length and is delivered over a two-week period. Each day of classes, 7 hours in length, is broadcast via videoconference, from 9:00 a.m. to 4:30 p.m. In addition to the lunch period, health breaks of 15-20 minutes breaks are inserted during the morning and the afternoon.

COURSES - MODULE A

COURSE 1 | 1 DAY   The legal and institutional framework for access to information and privacy

COURSE 2 | 1 DAY   The application of the legal framework into the processing of communication or correction requests

COURSE 3 | 3½ DAYS   The processing of communication or correction requests

COURSE 4 | ½ DAY   Introduction to Privacy

The joint attestation from the *Université de Montréal and the AAPI* confirms the analyst's ability to exercise leadership in the implementation of good ATIP practices.	The joint attestation of the *Université of Montréal and the AAPI* confirms, for the federal institution, a guarantee of quality of the training received

THE METHODOLOGY

Module A of the ATIP Training Program - Federal Institutions, **Integration to the ATIP Analyst function**, aims to develop basic skills in access to information and privacy by focusing on practice. All the courses are taught by ATIP experts who favor a pedagogical approach that encourages active participation, using concrete situations with practical solutions and off ways to apply knowledge immediately. Pre-course readings and exercises may be required for some courses; the instructor will expect all participants to have completed the required preparation.

In addition, practical workshops are integrated into the module so that participants can apply methods and best practices and develop their reasoning and reflection with regard to situations similar to their reality. This learning formula promotes a better integration of knowledge and know-how and allows participants to increase their professional expertise and autonomy.

THE RECOGNITION AND EXAM

Attestation issued by the AAPI and the Université de Montréal

Attestation will be granted upon successful completion of **Module A - Integration to the ATIP Analyst function**. To obtain the Université de Montréal and AAPI attestation, the participant must pass the exam after having completed **all the courses** in the module. In the event of an absence from one or more of the Module A courses, the participant may retake the course(s) and write the exam at a subsequent Module A broadcast session.

To obtain the ATIP attestation, the participant will be required to write an online exam off by the Université de Montréal. The exam, developed by a committee of ATIP experts in collaboration with the Université de Montréal, Faculté de l'éducation permanente, reflects the learning objectives of each course in the module. It assesses the participant's knowledge and skills through a series of multiple-choice questions. The participant will have a limited amount of time to complete the online exam.

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ORIENTATION AND OBJECTIVES OF MODULE A

ORIENTATION

To facilitate the integration of ATIP analysts into the ATIP function Analysts through the development of essential skills required to perform the tasks assigned to them.

OBJECTIVES

- Convey knowledge related to the obligations, standards and expected practices according to the level of complexity of the tasks assigned
- To present recommended ATIP practices in relation to the needs and realities of federal institutions
- Facilitate the integration of knowledge through practical exercises, case studies, tools and procedures related to the tasks

THE SKILLS TO BE ACQUIRED

At the end of Module A, participants will have acquired the following skills:

- Knowing the legal framework for ATIP: legislation, regulations and policy instruments
- Knowing the role and responsibilities of the institution and the ATIP Officer
- Knowing how to apply the legal framework relating to the processing of requests: admissibility and exemptions to the right of access
- Knowing how to process requests under the ATIA and the PA while respecting requirements and constraints, such as timelines
- Knowing how to recognize potential situations where privacy may be invaded in the performance of their duty

ATIPTP-IF, DISTINCTION AND ACCREDITATION

To provide the best in training, the AAPI engages experienced specialists and practitioners in the design and development of its ATIP training programs as trainers, expert members of the Skills Development Advisory Committee and the Reading Committee, or members of the production team.

The ATIP Training Program offered to federal institutions is distinguished by its content, the professional quality of its trainers and its pedagogical approach that encourages active participation, using concrete situations with practical solutions and proposing procedures for the immediate application of knowledge. The program is accredited by the Faculté de l'éducation permanente of the Université de Montréal, which allows participants who meet the ATIPTP-IF requirements to receive an attestation in the form of continuing education units.

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COURSE 1 - 1 DAY

THE LEGAL AND INSTITUTIONAL FRAMEWORK FOR ACCESS TO INFORMATION AND PRIVACY

In this course, participants will learn about the legal and institutional framework within which the government institution and its head of ATIP operates.

The *Access to Information Act (ATIA) and the Privacy Act (PA)*, regulations and policy instruments will be presented. Links will be established between these texts so that the participant is familiar with all the ATIP rules and can easily find his way around. The legal concepts and rules related to the processing of access or correction requests will be presented in more detail in Course 2.

At the institutional level, participants will learn about the role and responsibilities of the federal institution and its head. They will also be given an overview of the role of other stakeholders, including the Treasury Board, the Information Commissioner, and the Privacy Commissioner, in the implementation and administration of the two Acts.

GENERAL OBJECTIVE

Know the legal and institutional environment in which the federal institution and its head operate and understand its objectives.

LEARNING OBJECTIVES

- Describe and explain the objectives of the ATIP legislation
- Comparing and differentiating the ATIA and PA and their Regulations
- Describe the normative framework (policy instruments) in ATIP and establish links between legislation and policy instruments
- Describe and explain the role and responsibilities of the federal institution and its head
- Describe and explain the role and key responsibilities of stakeholders in the implementation and enforcement of legislation

COURSE PLAN (an overview)

- The foundations, values, and objectives of ATIP legislation
- The ATIA and PA: Overview, complementarity of legislation
- Regulations and Policy Instruments: Overview
- The federal institution: typical organization, status, role, and responsibilities
- The person in charge: delegation, role, and responsibilities
- Key players in the implementation and enforcement of the Acts: Overview of their role

COURSE 2 - 1 DAY

THE APPLICATION OF THE LEGAL FRAMEWORK INTO THE PROCESSING OF COMMUNICATION OR CORRECTION REQUESTS

During this course, participants will be introduced to the legal concepts and notions necessary to process requests made under the ATIA or the PA, such as the notions of record and personal information, to determine compliance. They will review the conditions under which all exemptions to access to records and personal information, discretionary and mandatory, apply as well as the principles for applying these exemptions in relation to the purposes of the Act.

GENERAL OBJECTIVE

Explore the legal concepts required to process requests to establish compliance and to identify exemptions to the right of access and restrictions on exemptions, documenting the conditions under which they apply.

LEARNING OBJECTIVES

- Describe key concepts related to request processing
- Differentiate between types of exemptions
- Identify exemptions and explain the conditions of application of each one
- Set out the restrictions on the application of exemptions and their conditions
- State and explain the principles of application of exemptions

COURSE PLAN (an overview)

- The right of access to documents: documents covered, documents excluded, procedure for exercising the right of access
- The right of access to personal information: information covered, documents excluded, how to exercise the right of access
- Conditions for the application of exemptions to the disclosure of documents
- Conditions for the application of exemptions to the disclosure of personal information
- Restrictions on the application of the exemptions

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COURSE 3 - 3 ½ DAYS

THE PROCESSING OF COMMUNICATION OR CORRECTION REQUESTS

In this course, the process, procedural requirements, and good work practices will be seen in detail and put into practice. Emphasis will be placed on the technical aspects of processing all types of requests and the complete processing (up to the decision) of simple requests.

An important part of the course will be devoted to experimentation. Participants will have to analyze requests and documents by applying the knowledge gained in this course and in courses 1 and 2. These cases will enable them to further master the standards and procedure, and to develop reasoning and reflection with regards to situations similar to reality.

Thus, this course aims to ensure that participants develop methods that will enable them to present a properly documented file to the person in charge, depending on the action to be taken.

GENERAL OBJECTIVE

To process requests for disclosure and correction in an efficient and structured manner, while respecting the legal requirements and the policies of the government institution.

LEARNING OBJECTIVES

- Assessing the admissibility (compliance) of requests under the ATIA and PA
- Appling the procedures for processing requests for access to documents and personal information and requests for correction of personal information
- Assisting the requester
- Applying a method of document analysis and sampling that facilitates the decision making of the manager
- Document and formulate draft decisions for simple requests

COURSE PLAN (an overview)

- The head and the ATIP Office: its mission, roles, and responsibilities
- The application of access and correction procedures
- Handling complaints relating to access and correction requests

COURSE 4 - ½ DAY

INTRODUCTION TO PRIVACY

During this course, participants will be introduced to the protection of personal information in the performance of their duties. They will learn about the main protection principles and the limits sets by the PA on the collection, use and disclosure of personal information to third parties.

The importance of ensuring the protection of personal information will be demonstrated to them by analyzing situations that involve privacy risks in their work.
They will learn how to report a privacy breach and will be given an overview of how the government institution should handle such an incident.
such an incident.

This course aims to develop good privacy reflexes in the participants. They will also be made aware that the privacy is everyone's business and that their contribution is important.

GENERAL OBJECTIVES

- Know the principles of privacy and the key obligations set out in the Privacy Act
- Identify potential privacy breach situations and apply the breach management procedure according to their level of responsibility

LEARNING OBJECTIVES

- Describe the rights conferred by the PA to the person concerned
- Describe the life cycle of personal information and the related privacy principles
- Identify potential privacy breaches in the workplace and apply privacy breach management procedures according to level of responsibility

COURSE PLAN (an overview)

- Privacy's principles for the life cycle of personal information
- The rights conferred by the PA
- Privacy breaches, breach reporting and the procedure for managing a breach of confidentiality

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OVERVIEW

MODULE B COURSE DELIVERY

Module B is 42 hours in length and is delivered over a two-week period. Each course day is 7 hours in length and is broadcast via videoconference from 9:00 am to 4:30 pm. In addition to the lunch period, health breaks of 15-20minutes breaks are inserted during the morning and the afternoon.

COURSES - MODULE B

COURSE 1 | 1 DAY The institutional and legal environment for processing ATIP requests

COURSE 2 | 1 DAY Ethics in ATIP Decision Making

COURSE 3 | 2 DAYS The processing of advanced ATIP requests: Injury test, Exercising of discretion, case law analysis

COURSE 4 | 2 DAYS The processing of ATIP Complaints

The joint attestation from the *Université of Montréal and the AAPI* confirms the analyst's ability to exercise leadership in the implementation of good ATIP practices.

The joint attestation of the de *Université of Montréal and the AAPI* confirms, for the federal institution, a guarantee of quality of the training received.

THE METHODOLOGY

Module B of the ATIP Training Program - **Federal Institutions, Perfecting the processing of ATIP** requests and complaints, aims to integrate advanced ATIP knowledge through the development of essential skills for the intermediate level function. All courses are taught by ATIP experts, who favor a pedagogical approach that encourages active participation, uses concrete situations with practical solutions, and provides means for immediate application of knowledge. Pre-course readings and exercises may be required for some courses; the trainer will expect all participants to have completed the required preparation.

In addition, practical workshops are integrated into the module so that participants can apply methods, best practices, and develop their reasoning and refl on situations similar to their reality. This learning formula promotes a better integration of knowledge and know-how and allows participants to increase their professional expertise and autonomy.

THE RECOGNITION AND EXAM

Attestation issued by the AAPI and the Université de Montréal

Attestation will be granted upon successful completion of **Module B - Perfecting the processing of ATIP requests and complaints**. To obtain the Université de Montréal and AAPI attestation, the participant must pass the exam after completing all courses in the module. In the event of an absence from one or more of the Module B courses, the participant may retake the course(s) and write the exam at a subsequent Module B broadcast session.

To obtain the ATIP attestation, the participant will have to write an exam off online by the Université de Montréal. The exam, developed by a committee of ATIP experts in collaboration with the Université de Montréal - Faculté de l'éducation permanente, refl the learning objectives of each course in the module. It assesses the participant's knowledge and skills through a series of multiple-choice questions. The participant will have a limited amount of time to complete the online exam.

STREAM 1 - MODULE B - PERFECTING THE PROCESSING OF ATIP REQUESTS AND COMPLAINTS

ORIENTATION AND OBJECTIVES OF MODULE B

ORIENTATION

To foster the integration of advanced ATIP knowledge through the development of essential mid-level skills.

OBJECTIVES

- To impart knowledge related to the obligations, standards and practices expected for the level of complexity of the ATIP request and complaint processing function
- To present recommended ATIP practices in relation to the needs and realities of federal institutions
- Facilitate the integration of knowledge through practical exercises, case studies, tools and procedures related to the tasks
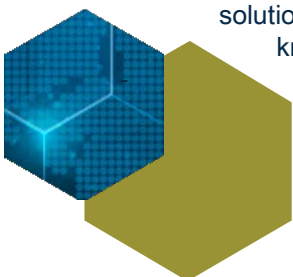
SKILLS TO BE ACQUIRED

At the end of Module B, participants will have acquired the following skills:

- Know the institutional and legal environment for processing ATIP requests
- Know the scope of the analyst's key role to consolidate the skills they must possess and develop to perform their duties properly
- Know how to make a decision in accordance with professional values and obligations
- Know how to deal with complex communication requests by being equipped to exercise discretion and the injury test for certain exemptions
- Analyze and apply the complaint resolution process to make the best decisions while balancing different interests

ATIPTP-IF, DISTINCTION AND ACCREDITATION

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COURSE 1 - 1 DAY

THE INSTITUTIONAL AND LEGAL ENVIRONMENT FOR PROCESSING ATIP REQUESTS

During this course, the legal and normative framework for ATIP will be presented to participants in summary form, as well as the role of the main ATIP stakeholders in the federal administration, including the Access to Information Commissioner and the Privacy Commissioner. Subsequently, the legal and administrative role and responsibilities of the federal institution will be presented in more detail as well as the delegation function of the head in ATIP.

Participants will examine the conditions for the application of discretionary exemptions as well as those that require the assessment of prejudices. These legal concepts will be applied in conjunction with case law and Commissioner's decisions in courses 3 and 4 of this module.

UPON COMPLETION OF THIS COURSE, YOU WILL BE ABLE TO:

- Describe and explain the legal and regulatory framework in ATIP
- Describe and explain the legal and administrative role and responsibilities of the federal institution
- Describe and explain the role and responsibilities of the ATIP Officer
- State and explain the principles of application of discretionary exemptions
- State and explain the principles of application of exemptions that require an assessment of harm

METHODOLOGY

The pedagogical approach aims to provide an understanding of the institutional environment and to deepen the legal concepts related to the processing of ATIP requests by using learning activities.

As part of this course, a learning tool will be made available to participants.

COURSE 2 - 1 DAY

ETHICS IN ATIP DECISION MAKING

In this course, participants will become familiar with the founding principles of the Act and the values related to its application. The implementation of ATIP mandates often brings to the forefront sometimes divergent interests, administrative constraints such as deadlines or the availability of sufficient resources, relational aspects, both in terms of communication and emotions, and sometimes uncertainty and discomfort.

In this context, how to convince and make the best decision? Ethical reflection can help the manager to answer this question. Thus, in this course, the participants will experiment with a method to help them make ethical decisions by analyzing situations that are representative of the ethical issues encountered in the course of their work.

GENERAL OBJECTIVE

To understand the scope of the determining role of the manager and to consolidate the skills that he or she must possess and develop to carry out his or her duties properly.

UPON COMPLETION OF THIS COURSE, YOU WILL BE ABLE TO:

- Recognize the values that underlie the ATIP legal framework
- Identify the various values that interfere with your work and become aware of their impact on decision making
- Experience a method of ethical decision-making when faced with a personal or professional dilemma or conflict between organizational values and those underlying ATIP

METHODOLOGY

The pedagogical approach aims to engage participants using case studies. This training allows participants to explore ethical issues in ATIP, to exercise discretion in the application of exemptions to access based on a decision support method.

In this course, participants will be provided with an ATIP decision support method to assist them in a personal or professional dilemma.

COURSE 3 - 2 DAYS

THE PROCESSING OF ADVANCED ATIP REQUESTS

Course 3 focuses on the analysis of government institutions' administrative records and the personal information they hold in order to carry out their mission and on the application of access procedures that concern them. More specifically, participants will be required to develop their questioning skills when applying exemptions that require an injury test and when they must demonstrate the application of their discretionary exercise.

In addition to proposing to participants ways of doing things and tools that will allow them to manage these procedures even more efficiently and in compliance with the law, this course aims to ensure that they develop skills and methods of analysis that will allow them to reconcile interests that may be opposed in appearance and often in fact and, consequently, to make fair and informed decisions.

GENERAL OBJECTIVE

To process complex access requests in accordance with legal and jurisprudential requirements and the management orientations of the federal institution.

UPON COMPLETION OF THIS COURSE, YOU WILL BE ABLE TO:

* Apply an analytical method to process these requests
* Conduct an injury test in the application of a discretionary exemption
* Correctly exercise discretion in the application of an exemption
* Document its arguments on the application of exemptions (analysis)
* Give reasons for the decision on the application of an exemption (draft decision writing)
* Identify the legal obligations applicable to a given situation related to the processing of requests for access to information, access to personal information

METHODOLOGY

The pedagogical approach favored in Course 3 aims at the active participation of learners by using situational exercises punctuated with practical solutions and by proposing means for the immediate application of the knowledge acquired and the use of the tools presented in their ATIP practice.

COURSE 4 - 2 DAYS

THE PROCESSING OF ATIP COMPLAINTS

In this course, participants will become familiar with the rules, principles and procedures for responding to a complaint from the Privacy Commissioner's office and the Access to Information Commissioner's office. They will become familiar with the different types of complaints that the institution may receive and the different levels of legislation that exist to resolve a complaint. They will be made aware of what can and cannot be done when the institution is under investigation following a complaint. They will also be asked to draft a resolution of the complaint taking into account the different approaches that were taken during the document analysis stage in order to make the best decisions while reconciling the different interests

GENERAL OBJECTIVE

Understanding the complaint resolution process

UPON COMPLETION OF THIS COURSE, YOU WILL BE ABLE TO:

* Recognize the different categories of complaints
* Know the actions to be taken according to the category of complaint
* Know the different legislative levels that may exist in the resolution of complaints
* Become familiar with what can and cannot be done in a complaint resolution
* Write a draft complaint resolution

METHODOLOGY

The pedagogical approach used in Course 4 aims to encourage the active participation of participants by using complaint studies, and by proposing means and methods for the immediate application of the knowledge acquired and the use of the tools presented in their ATIP practice.

WHO WE ARE?

The Association of Access to Information and Privacy Professionals, commonly referred to as "AAPI", is a non-profit organization (NPO), which brings together more than 750 ATIP professionals from the Quebec and federal public administrations. Its mission is to foster the development and leadership of access to information and privacy professionals. For over 30 years, the AAPI has been responding to the needs of ATIP professionals by providing expertise and support, promoting the effectiveness and consistency of ATIP practices, taking into account the expectations of citizens and the obligations of the legal framework.

EXCELLENT REASONS TO PARTICIPATE IN THE ATIPTP-IF

Do you want to stay on top of what's happening in access to information and privacy, develop your staff's skills and ensure that you are fully involved in implementing best practices in these areas within your organization? The AAPI offers you all this and more!

Your employee's participation in the Access to Information and Privacy Training Program for Federal Institutions allows them to have access to the products and services offered by the AAPI, to develop their skills through their participation in the ATIPTP-IF Program, and to obtain an attestation issued jointly by the Université de Montréal and the AAPI. In addition, participation in the Program allows the participants to benefit from consulting services and leading-edge expertise in ATIP.

A proactive and passionate team! Our team of experienced professionals and expert practitioners is at your service to help you increase your effectiveness and that of your organization on a daily basis.

Ms. Marie-Claude Juneau, an experienced person who has worked in federal institutions, is part of our team as the ATIPTP-IF Coordinator. Her presence is a valuable asset for all aspects of research and development of training for federal institution employees. She will be able to assist you in the operational management of access to information and in the development of rules and practices for ATIP management under the ATIPTP-IF Program.

AAPI SATELLITE OFFICE IN OTTAWA
Marie-Claude Juneau,
ATIPTP-FI Coordinator, AAPI
mcjuneau@aapi.ca or 819-209-7877

Finally, the AAPI is:

- **An extensive and effective digital presence**

- **A leading-edge offer in skills development by the ATIPTP-IF**

- **Recognition from the academic community by the Faculté d'éducation permanente (FEP) of the Université of Montréal**

- **Specialized tools tailored to the needs of professionals offered by the ATIPTP-IF Program**

- **An association that listens to and serves institutions - Our team of expert practitioners can adapt the ATIPTP-IF modules to your training needs with the objective of implementing your current practices.**

Learn more about membership privileges, services, and skills development activities by visiting www.aapi.qc.ca.

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