

concerned with Indian, Inuit, or Métis issues would benefit from the production of a concise directory which lists only those classes of records kept in the Department of Indian and Northern Affairs and perhaps in one or two other institutions, such as the Departments of National Health and Welfare and Regional Industrial Expansion. For this category of applicant, it may be unnecessary to produce the entire *Access Register* and *Personal Information Index*. Environmental associations, consumer groups, and veterans' organizations may have relatively limited requirements, which could be amply served by a more concise index to government record holdings. Similarly, inmates of correctional institutions ordinarily would not need to have the entire *Personal Information Index* in order to look up the information banks pertaining to them.

Since both the *Access Register* and the *Personal Information Index* are produced from an automated data base, it would be appropriate and helpful for the Treasury Board to allow users to have access to the data in them on an on-line basis and/or through their sale in digital form for use on computers.

### **Recommendations:**

- 2.11 The Committee recommends that the *Access Register* be combined with such other government publications as the *Index of Programs and Services* and the *Organization of the Government of Canada*.**
- 2.12 The Committee further recommends that this omnibus access tool and the *Personal Information Index* be made available by the Treasury Board and individual government institutions on an on-line basis and/or through their sale in digital form for use on computers.**
- 2.13 The Committee further recommends that the Treasury Board and individual government institutions make available segments of these various user guides on a customized basis to suit the needs of particular user groups.**

## **The Responsibilities of Access and Privacy Coordinators**

The heads of government institutions are ultimately responsible for the implementation of the *Access to Information Act* and the *Privacy Act*. In practice, government institutions have Access and Privacy Coordinators on either a full- or part-time basis, whose primary responsibility tends to be the handling of requests for access to government records and personal information. On occasion, the Coordinators perceive a conflict between their responsibilities under this legislation and their career prospects in the government institution employing them. There is thus a problem of how best to protect their careers and to provide them with some measure of independence and effective training. The Committee believes that the offices of Coordinators must become the primary agents for promoting effective implementation of the *Access to Information Act* and the *Privacy Act* within each government institution.

The Privacy Commissioner has encapsulated the difficult roles of the Coordinators, whom he describes as the "privacy professionals":

There is a difficult role. They have divided loyalties, pulled on the one side to their own department where their careers are at stake, on the other to the Privacy Act and to fair information practices. Sometimes the two roles are difficult to reconcile, and that, of course, is inevitable.

Not inevitable is the lack of support given to some privacy co-ordinators by their superiors. Some co-ordinators are even reluctant to press their concerns with departmental lawyers lest they be considered disloyal. Nor, as a group, do they seem influential as the privacy consciences of their departments. Many of them are not in the mainstream of their organization. The position of co-ordinator is not yet generally seen as desirable for career progress.<sup>20</sup>