

His comments apply with equal force to Coordinators in the discharge of their responsibilities under the *Access to Information Act*.

An alternative model for more effective administration of the Acts within government institutions deserves consideration. In 1975, the U.S. Department of Defense set up a Defense Privacy Board, headed by the Deputy Assistant Secretary of Defense for Administration, and a Defense Privacy Office, comprised of three professional staff and a secretary. The director of the latter office is the Executive Secretary of the Defense Privacy Board. These persons and groups are responsible for the interpretation and implementation of the U.S. *Privacy Act* of 1974 in the Department of Defense. It is unfortunate that no Canadian federal institution has set up a comparable office designed to ensure the effective implementation of the *Access to Information Act* and the *Privacy Act*.

The current training of Access and Privacy Coordinators appears to be deficient in the sense that no regular government-wide program exists, except for the admirable *ad hoc*, cooperative efforts of the Administrative Policy Branch of Treasury Board and the Office of the Information and Privacy Commissioners. The latter involves six to eight courses a year for senior managers at a training centre during which actual cases are considered. The Treasury Board also carries out *ad hoc* training for government institutions which have a significant case load.

The Committee urges the Treasury Board to organize standard, formal training for new Access and Privacy Coordinators, perhaps using automated training modules, audiovisuals, and films. The U.S. Office of Management and Budget, which has statutory responsibilities comparable to the Treasury Board, places the burden for such training on the Office of Personnel Management (formerly the Civil Service Commission).²¹ The Treasury Board might choose to enter into arrangements for such training tasks with the Public Service Commission of Canada. The Board could structure the training programs on the *Access to Information Act* and the *Privacy Act*, preferably as a standard part of departmental training in most instances, and then arrange for the Public Service Commission to offer the courses on a cost recovery basis.

Another relevant United States model exists in the area of training programs. In 1981-82 the U.S. Defense Department, through its Defense Privacy Office, and in cooperation with the Department of Health and Human Services, created its own training program on the *Privacy Act* for managers, who were taught initially by Privacy Office staff.²² The goal should be to train local managers to offer training programs themselves.

Canadian government institutions should be encouraged to cooperate with each other for training purposes. The Royal Canadian Mounted Police and Revenue Canada, Taxation are candidates for leadership roles in this regard, since they are known to have created effective training programs for internal use. Revenue Canada, Taxation conducts training courses and refresher training sessions for its own staff concerning the *Access to Information Act* and the *Privacy Act*. These sessions employ case studies drawn from actual taxpayer files. Revenue Canada is currently planning to distribute a pamphlet in question and answer form on both Acts to all employees. In 1985, its Access to Information and Privacy Division conducted Executive Briefing Seminars in seven cities across Canada at the request of the Canadian Institute of Chartered Accountants.

The Committee applauds the initiative that Access and Privacy Coordinators themselves have taken in recent months in organizing a Federal Access and Privacy Association as a Canadian counterpart to the American Society of Access Professionals (ASAP), which offers training and education to U.S. federal government employees on both the *Privacy Act* and the *Freedom of Information Act*.

As a result of the Committee's hearings, the Treasury Board in 1986 conducted a survey of the roles and job satisfaction of Access and Privacy Coordinators in order to better understand their current problems. This involved a free-form discussion with fifteen Coordinators and staff advisors and the preparation of a Report by the Treasury Board.²³