



ANNUAL REPORT TO PARLIAMENT

Access to Information Act

**For the period from
April 1, 2020 to March 31, 2021**

R E V E R A I N C .

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ANNUAL REPORT TO PARLIAMENT

ACCESS TO INFORMATION ACT

(APRIL 1, 2020 – MARCH 31, 2021)

FOREWORD

This Annual Report to Parliament has been prepared in accordance with Section 94 of the *Access to Information Act* (the “Act”). It is intended to describe how Revera Inc. (“Revera”) administered its responsibilities in relation to the Act for the reporting period from April 1, 2020 to March 31, 2021 (the “reporting period”).

Annual Reports are to be tabled in Parliament in accordance with section 94 of the Act.

MANDATORY REPORTING REQUIREMENTS

1. INTRODUCTION

1.1 SUMMARY

The purpose of the Act is to provide a right of access to information in records under the control of a government institution in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific, and that decisions on the disclosure of government information should be reviewed independently of government.

This Act is intended to complement and not replace existing procedures for access to government information and is not intended to limit in any way access to the type of government information that is normally available to the general public.

1.2 MANDATE

Revera is a leading owner, operator, investor in, and developer of the senior living sector. Through its portfolio of partnerships, Revera owns or operates more than 500 properties across Canada, the United States and the United Kingdom, serving more than 55,000 seniors. Revera offers seniors' apartments, independent living, assisted living, memory care, and long-term care. With approximately 50,000 employees dedicated to providing exceptional care and service, Revera provides seniors with choices that help them do more of the things that bring joy to their lives. Through Revera's Age is More program, Revera is committed to challenging ageism, Revera's social cause of choice.

2. STRUCTURE OF THE INSTITUTION TO FULFILL ITS RESPONSIBILITIES

Revera is a wholly-owned subsidiary of the Public Sector Pension Investment Board ("PSP Investments"). The Access to Information and Privacy (ATIP) Office at Revera consists of an Access to Information and Privacy Coordinator, who is also Revera's Privacy Officer, and an Assistant Privacy Officer (Canadian Operations). There are no regional ATIP staff. There are no service agreements under section 96 of the Act to which Revera was party during the reporting period.

3. DELEGATION ORDER

Revera Inc., a wholly-owned subsidiary of
Public Sector Pension Investment Board,
and its Wholly-Owned Subsidiaries

Delegation Order (“Order”)
(section 95(1), *Access to Information Act*,
R.S.C. 1985, c. A-1, as amended and section 73, *Privacy Act*, R.S.C. 1985, c. P-21, as amended)

1. This Order may be cited as the “Revera Inc. and wholly-owned subsidiaries of Revera Inc. Head of Institution Delegation Order pursuant to the *Access to Information Act* and *Privacy Act*”.
2. Pursuant Section 95(1) of the *Access to Information Act* and Section 73 of the *Privacy Act*, the undersigned, acting in his capacity of head of Revera Inc. and its Wholly-Owned Subsidiaries in existence as of the date of this Order as well as those which may hereafter be established (the “Government Institutions”), hereby designates the person holding the position set out in the schedule set forth in Section 4 below, or the person occupying on an acting basis this position, to exercise his powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite the position. This Delegation Order replaces all previous delegation orders for the Government Institutions.
3. For the purposes of this Order, “Wholly-Owned Subsidiaries” shall include all Canadian wholly-owned subsidiaries of Revera Inc. which are corporations, with the exception of those subsidiaries with their own heads.
4. Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Access to Information and Privacy Coordinator	Full authority	Full authority

This Delegation Order has been made at Mississauga, on the 21st day of June, 2019.



Thomas G. Wellner
President and Chief Executive Officer

4. INTERPRETATION OF THE STATISTICAL REPORT

Revera received nine requests for information under the Act during this reporting period. Seven of the requests were closed during the reporting period, with the two remaining requests carried over to the

next reporting period. 100% of the seven requests were closed within the legislated timelines. Two of the requests were completed within 30 days; four of the requests were completed within 60 days; and one of the requests was completed within 120 days. The percentage of requests for which records were disclosed in part was 42.8%; with 42.8% of the requests for records exempted; and 14.2% for which no records existed.

Extensions were taken on four of the requests pursuant to section 9(1)(a) of the Act on the basis that these requests necessitated a search through a large number of records in multiple locations, and meeting the original time limit would have unreasonably interfered with Revera's operations.

In the past 6 years, Revera has received three requests for information under the Act, all during the 2016/2017 reporting period. Due to the exceptional circumstances surrounding COVID-19 and the limited number of access to information requests received in the ordinary course of Revera's business, no meaningful trends can be identified.

No consultations were received or completed during the reporting period.

The Statistical Report and Supplemental Statistical Report on the *Access to Information Act* for 2020-2021 are attached.

While COVID-19 did not have an impact on Revera's ability to fulfill its responsibilities under the Act, it caused minor delays in gathering responsive records as staff were performing essential services during the pandemic.

5. ACCESS TO INFORMATION-RELATED EDUCATION AND TRAINING ACTIVITIES UNDERTAKEN BY ATI STAFF AND PROVIDED TO INSTITUTION'S EMPLOYEES

Revera has not undertaken any education, training or awareness activities related to access to information for the reporting period.

6. OVERVIEW OF NEW AND/OR REVISED INSTITUTIONAL ACCESS TO INFORMATION ACT RELATED POLICIES AND PROCEDURES IMPLEMENTED DURING THE REPORTING PERIOD

Revera did not implement any new or revised access to information policies, guidelines, procedures, or initiatives during the reporting period.

PSP Investments has adopted an internal procedure for handling access to information requests upon becoming subject to the Act. As part of a revision process, the procedure was revised on January 15, 2013. The same procedure is applied for the handling of access to information requests that may be received at Revera.

7. COMPLAINTS OR INVESTIGATIONS

Revera did not receive any complaints and no audits or investigations were concluded under the Act during the reporting period.

8. MONITORING OF TIME PROCESS FOR REQUESTS

In the ordinary course of its business, Revera very rarely receives access to information requests. As a result, there is no formal procedure in place to monitor the time taken to process these requests and the level of officials advised. Generally, when access to information requests are received, the Access to Information Coordinator or Assistant Privacy Officer monitors the time taken to process these requests manually, and notifies appropriate members of Revera's senior leadership team of these requests. The time taken to process these requests is then recorded in tracking charts maintained by the ATIP Office. Notwithstanding the significant increase in the number of access to information requests received during this reporting period as a result of the exceptional circumstances surrounding COVID-19, Revera's ATIP Office was able to fulfill its responsibilities under the Act in accordance with its general practices, despite minor delays incurred in gathering responsive records as staff were performing essential services during the pandemic.



Statistical Report on the *Access to Information Act*

Name of institution: Revera Inc.

Reporting period: 4/1/2020 to 3/31/2021

Section 1: Requests Under the *Access to Information Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	9
Outstanding from previous reporting period	0
Total	9
Closed during reporting period	7
Carried over to next reporting period	2

1.2 Sources of requests

Source	Number of Requests
Media	0
Academia	0
Business (private sector)	0
Organization	0
Public	9
Decline to Identify	0
Total	9

1.3 Informal requests

Completion Time							Total
1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
0	0	0	0	0	0	0	0

Note: All requests previously recorded as “treated informally” will now be accounted for in this section only.

Section 2: Decline to act vexatious, made in bad faith or abuse of right requests

	Number of Requests
Outstanding from previous reporting period	0
Sent during reporting period	0
Total	0
Approved by the Information Commissioner during reporting period	0
Declined by the Information Commissioner during reporting period	0
Carried over to next reporting period	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	more Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	2	1	0	0	0	3
All exempted	0	2	1	0	0	0	0	3
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	1	0	0	0	0	1
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Decline to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0
Total	0	2	4	1	0	0	0	7

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	0	16(2)	0	18(a)	0	20.1	0
13(1)(b)	0	16(2)(a)	0	18(b)	3	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	0	18(d)	3	21(1)(a)	0
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	0
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	0
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	5	21(1)(d)	0
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	0
15(1)	0	16.1(1)(d)	0	19(1)	4	22.1(1)	0
15(1) - I.A.*	0	16.2(1)	0	20(1)(a)	0	23	1
15(1) - Def.*	0	16.3	0	20(1)(b)	0	23.1	0
15(1) - S.A.*	0	16.31	0	20(1)(b.1)	0	24(1)	0
16(1)(a)(i)	0	16.4(1)(a)	0	20(1)(c)	0	26	0
16(1)(a)(ii)	0	16.4(1)(b)	0	20(1)(d)	0		
16(1)(a)(iii)	0	16.5	0				
16(1)(b)	0	16.6	0				
16(1)(c)	0	17	0				
16(1)(d)	0						

* I.A.: International Affairs Def.: Defence of Canada S.A.: Subversive Activities

3.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
68(a)	0	69(1)	0	69(1)(g) re (a)	0
68(b)	0	69(1)(a)	0	69(1)(g) re (b)	0
68(c)	0	69(1)(b)	0	69(1)(g) re (c)	0
68.1	0	69(1)(c)	0	69(1)(g) re (d)	0
68.2(a)	0	69(1)(d)	0	69(1)(g) re (e)	0
68.2(b)	0	69(1)(e)	0	69(1)(g) re (f)	0
		69(1)(f)	0	69.1(1)	0

3.4 Format of information released

Paper	Electronic	Other
0	3	0

3.5 Complexity

3.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
871	60	6

3.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	3	60	0	0	0	0	0	0	0	0
All exempted	0	0	2	0	1	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0	0	0
Total	3	60	2	0	1	0	0	0	0	0

3.5.3 Other complexities

Disposition	Consultation Required	Assessment of Fees	Legal Advice Sought	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	3	0	3
All exempted	0	0	3	0	3
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0
Total	0	0	6	0	6

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	7
Percentage of requests closed within legislated timelines (%)	100

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

3.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timeline Where an Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

3.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Section 4: Extensions

4.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
All disclosed	0	0	0	0
Disclosed in part	3	0	0	0
All exempted	1	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Decline to act with the approval of the Information Commissioner	0	0	0	0
Total	4	0	0	0

4.2 Length of extensions

Length of Extensions	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
30 days or less	3	0	0	0
31 to 60 days	0	0	0	0
61 to 120 days	1	0	0	0
121 to 180 days	0	0	0	0
181 to 365 days	0	0	0	0
365 days or more	0	0	0	0
Total	4	0	0	0

Section 5: Fees

Fee Type	Fee Collected		Fee Waived or Refunded	
	Requests	Amount	Requests	Amount
Application	0	\$0	9	\$45
Other fees	0	\$0	0	\$0
Total	0	\$0	9	\$45

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Request	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Request	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 8: Complaints and investigations

Section 32 Notice of intention to investigate	Subsection 30(5) Ceased to investigate	Section 35 Formal representations	Section 37 Reports of finding received	Section 37 Reports of finding containing recommendations issued by the Information Commissioner	Section 37 Reports of finding containing orders issued by the Information Commissioner
0	0	0	0	0	0

Section 9: Court Action

9.1 Court actions on complaints received before June 21, 2019 and on-going

Section 41 (before June 21, 2019)	Section 42	Section 44
0	0	0

9.2 Court actions on complaints received after June 21, 2019

Section 41 (after June 21, 2019)				
Complainant (1)	Institution (2)	Third Party (3)	Privacy Commissioner (4)	Total
0	0	0	0	0

Section 10: Resources Related to the Access to Information Act

10.1 Costs

Expenditures		Amount
Salaries		\$45,000
Overtime		\$0
Goods and Services		\$5,000
• Professional services contracts	\$5,000	
• Other	\$0	
Total		\$50,000

10.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	0.200
Part-time and casual employees	0.000
Regional staff	0.200
Consultants and agency personnel	0.000
Students	0.000
Total	0.400

Note: Enter values to three decimal places.



Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act*

Name of institution: Revera Inc.

Reporting period: 2020-04-01 to 2021-03-31

Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATIP requests through the different channels.

	Number of Weeks
Able to receive requests by mail	0
Able to receive requests by email	52
Able to receive requests through the digital request service	52

Section 2: Capacity to Process Records

2.1 Enter the number of weeks your institution was able to process paper records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Paper Records	0	52	0	52
Protected B Paper Records	0	52	0	52
Secret and Top Secret Paper Records	0	52	0	52

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Electronic Records	0	52	0	52
Protected B Electronic Records	0	52	0	52
Secret and Top Secret Electronic Records	0	52	0	52