

# Annual Report on the administration of the *Privacy Act*

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(1 April 2017 to 31 March 2018)



June 2018

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## Introduction

### Purpose of the *Privacy Act*

As set out in Section 2 of the *Privacy Act*, the purpose of this Act is “to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information”. This report is prepared in accordance with Section 71(1)(e) of the Act and is tabled in Parliament in accordance with Section 72.

### The Bank of Canada’s mandate

The Bank of Canada is the nation’s central bank. Its mandate, as defined in the *Bank of Canada Act*, is “to promote the economic and financial welfare of Canada.” The Bank’s four core areas of responsibility are:

#### *Monetary Policy*

The objective of monetary policy is to preserve the value of money by keeping inflation low, stable and predictable.

#### *Financial System*

The Bank promotes safe, sound and efficient financial systems, within Canada and internationally; oversees major clearing and settlement systems, and conducts transactions in financial markets in support of these objectives.

#### *Currency*

The Bank designs, issues and distributes Canada’s bank notes; oversees the note distribution system; and ensures a consistent supply of quality bank notes that are readily accepted and secure against counterfeiting.

#### *Funds Management*

The Bank provides funds-management services for the Government of Canada, the Bank itself and other clients. For the government, the Bank provides treasury-management services and acts as fiscal agent for the government’s public debt and foreign exchange reserves.

The Bank has a robust planning framework in place to implement and operationalize its mandate and vision. Every three years, the Bank establishes a medium-term plan (MTP) to set out its strategic direction and objectives.

## Administration of the *Privacy Act*

### Delegation of Authority

Under Section 71(2) of the Act, the Governor of the Bank of Canada undertakes the responsibilities of the designated Minister for the purposes of subsections 71(1)(a) and (d).

Responsibility for compliance with the requirements of the Act has been delegated by the Governor under Section 73 to the General Counsel and Corporate Secretary of the Bank, its Deputy Corporate Secretary and Access to Information and Privacy Coordinator. In addition, responsibility for various administrative requirements of the legislation, such as extending time

limits has been delegated to the ATIP Manager. A copy of the Bank's Delegation Order is attached (Appendix A).

### **Organizational Structure to Fulfill *Privacy Act* Responsibilities**

The responsibility for administering the Bank's ATIP program lies with the Bank's ATIP Office which is part of the Bank's Executive and Legal Services Department (ELS). In this reporting period, the ATIP Office was reorganized and a new full-time position was added to the staff complement to address the increasing demands associated with administration of the ATIP legislation. The reorganization was fully implemented in the final quarter of this reporting period. Under the management of the Access to Information and Privacy Coordinator, 1 Manager, 2 ATIP Specialists, 3 Analysts and 1 ATIP Assistant are responsible for coordinating the processing of ATIP requests, consultations, and complaints, responding to informal requests for information, providing advice and promoting ATIP awareness to staff and the public. The ATIP Office reports directly to the Deputy Corporate Secretary and Access to Information and Privacy Coordinator who reports to the General Counsel and Corporate Secretary and who in turn reports to the Governor. In addition, Senior Legal Counsel provides legal advice on a variety of files.

The Bank also has a network of ATIP departmental contacts throughout the organization. They are responsible for retrieving records and providing initial recommendations to the ATIP Office and departmental sign-off for the final treatment of records. They are not part of the ATIP Office and are therefore not counted in the Bank's statistical report.

### **Information Holdings**

The Bank's chapter of *Info Source*, an inventory of the Bank's information holdings, including a description of personal information holdings, is published on the Bank's website and serves as a tool to assist individuals interested in requesting information from the Bank. The Bank undertakes an annual review of its personal information holdings and updates *Info Source* as required, in addition to reviewing its information holdings, institutional functions, programs and activities.

### **Staff Awareness Activities**

During this reporting period, the ATIP Office delivered 33 awareness sessions to approximately 150 participants from various business units throughout the Bank, which incorporated both official languages. The focus of these sessions was on the general principles of the *Access to Information Act* (ATIA) and the *Privacy Act* and how they are administered at the Bank.

In addition, the ATIP Office developed and delivered a joint workshop with key stakeholders who shared a common interest in the Bank's Currency function. The purpose of this workshop was to expand the stakeholder knowledge of the application of the ATIA exemptions through a hands-on review of Bank records and a round table discussion on the deliberations when considering the application of exemptions. The participants came away with a clearer understanding of the parameters of the legislation, and the underlining considerations that need to be taken into account when assessing whether information can be disclosed. The ATIP Office plans to offer similar workshops to different departments within the Bank in the future.

The ATIP Office delivered privacy training to specific business units within the Bank whose business processes involve the management of personal information. Through innovation workshops over the coming year, the ATIP Office plans to expand and modernize its awareness program and leverage technology to communicate with Bank staff about privacy matters in new ways.

The Bank has also undertaken a major e-mail management initiative to ensure that corporate records are properly managed and are also readily retrievable in response to ATIP requests. To that end, the ATIP Office collaborated with the Bank's Knowledge and Information Management Services to deliver mandatory awareness sessions to Bank staff about the importance of good records management and the risks that can arise when information cannot be readily retrieved. The staff awareness campaign will continue throughout the year to ensure that Bank staff (1700) are made aware of the importance of e-mail management in advance of the January 2019 'go-live' date.

The Bank's practice is to brief Senior Management and the Board of Directors annually on Access to Information matters as well as reporting on ATIA priorities through departmental quarterly Entente Progress Reports, and contributing to the Bank's Enterprise Risk Management reporting process.

### **Institution-specific privacy related policies, guidelines and procedures**

During this reporting period, the Bank worked to finalize a privacy incident response directive that will be communicated to staff later this year following validation with internal stakeholders and associated incident response policies and procedures. The directive outlines governance and accountabilities with respect to the management of incidents involving personal information.

The ATIP Office is participating in various Bank committees to ensure that privacy considerations are reflected in Bank activities. Involvement on the Data Onboarding Process Improvement – Working and Management Group is intended to raise awareness of privacy risks associated with the acquisition and use of data sets for research purposes. A privacy checklist has been developed for the unique purpose of data acquisition and specialized privacy awareness sessions are delivered to researchers who are granted access to data sets containing personal information. In addition, privacy considerations are being addressed through the participation of the ATIP Office in the Bank's Cloud Committee. The Bank's cloud framework incorporates the requirement to assess privacy risks associated with the storage of personal information in the cloud.

The Bank is committed to upholding the highest standards of personal and professional conduct. Annually, the Bank requires its employees to acknowledge their awareness of, and compliance with, the Code of Business Conduct and Ethics (the "Code"). It describes the ethical principles and conduct expected of employees to ensure the Bank maintains its high standards. The Code includes references to the Bank's responsibilities and obligations under the *Access to Information and Privacy Acts*, to help ensure effective and consistent administration and compliance with the Acts and their regulations.

## Monitoring Processing

The ATIP staff regularly monitors all ATIP requests by holding weekly meetings to closely track all active files including maintaining a log of active requests. This helps the team to carefully monitor timelines, milestones, and next steps. More importantly these meetings promote discussions amongst the staff to help foster solutions as challenges arise and determine any process changes required to improve performance.

## Interpretation of the Statistical Report (Appendix B)

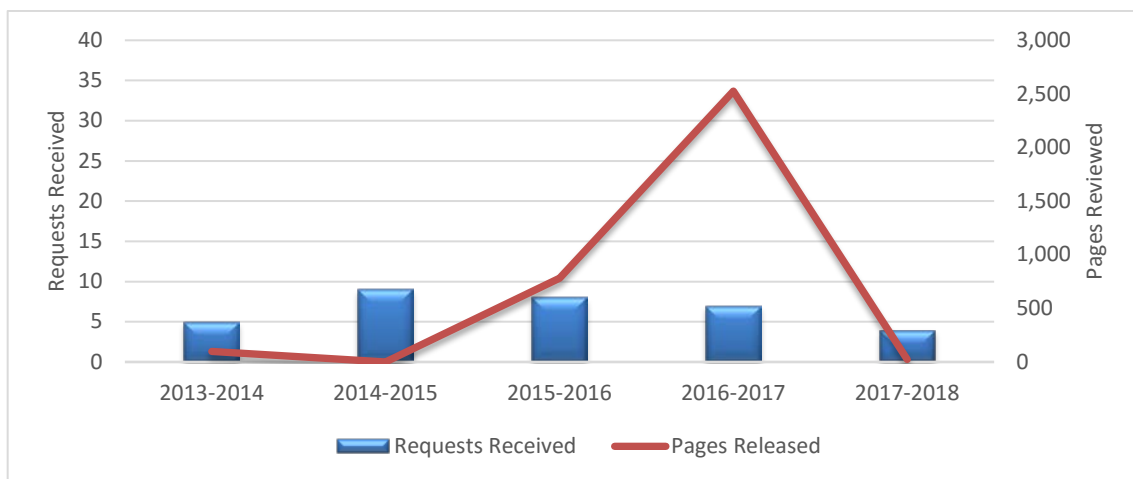
### Privacy Requests

This year, the Bank received 4 privacy requests compared to 7 requests during the previous reporting period. The table and chart below provide an overview of privacy requests received by the Bank for the past five years and the number of pages processed.

**Table 1: Overview of Privacy Requests Received and Completed**

| Fiscal Year | Requests Received | Requests Outstanding from previous reporting period | Requests completed | Number of pages processed |
|-------------|-------------------|---|--------------------|---------------------------|
| 2013-2014   | 5                 | 0   | 5                  | 97                        |
| 2014-2015   | 9                 | 0   | 8                  | 0                         |
| 2015-2016   | 8                 | 1   | 7                  | 782                       |
| 2016-2017   | 7                 | 2   | 7                  | 2,526                     |
| 2017-2018   | 4                 | 2   | 5                  | 25                        |

**Chart 1: Number of privacy requests and pages released, 2013-2014 to 2017-2018**



## Informal Requests

A request made under the Act is considered to be a formal request if it is presented to the Access to Information and Privacy Coordinator in writing, refers to the Act and contains sufficient information to identify the requested records. However, many of these formal requests can normally be treated through existing informal channels, if the requester agrees. For example, individuals inquiring about Canada Savings Bond holdings or Unclaimed Bank Balances are re-directed to the Bank's website for further details on accessing the information sought or to the specific client service work units within the Bank.

Informal requests for access to personal information made by Bank of Canada employees are responded to by the Bank's Human Resources Department or alternatively the ATIP Office. However, for various reasons, employees may choose to submit a formal request for access to personal information directly to the Bank's ATIP Office.

## Disposition of Requests

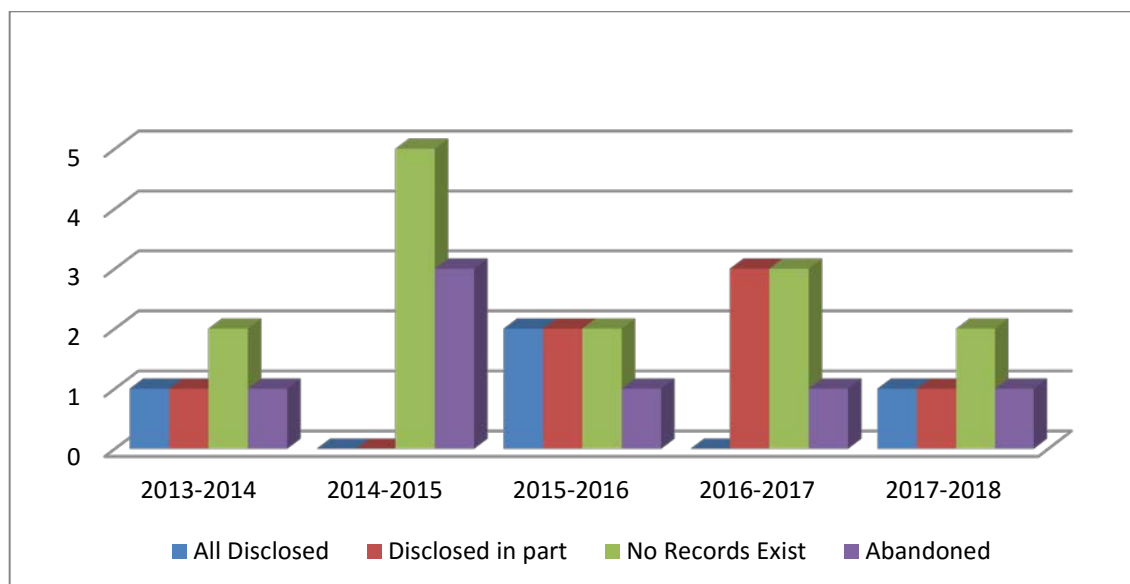
The following chart is a comparison of the disposition of completed requests for the last 5 years.

**Table 2: Disposition of Completed Requests**

A summary of the disposition of the privacy requests completed during the reporting periods of 2011-2017

| Fiscal Year | All Disclosed | Disclosed in part | No Records Exist | Abandoned |
|-------------|---------------|-------------------|------------------|-----------|
| 2013-2014   | 1             | 1                 | 2                | 1         |
| 2014-2015   | 0             | 0                 | 5                | 3         |
| 2015-2016   | 2             | 2                 | 2                | 1         |
| 2016-2017   | 0             | 3                 | 3                | 1         |
| 2017-2018   | 1             | 1                 | 2                | 1         |

**Chart 2: Disposition of Requests, 2013-2014 to 2017-2018**



## Exemptions Invoked

Section 27 was invoked in 1 request that related to personal information that is subject to solicitor-client privilege.

## Extensions

No extensions were taken during the 2017-2018 reporting period.

## Completion Time

Of the 5 requests completed during this reporting period, all were closed within the statutory deadline.

## Complaints and Investigations

During this reporting period, the Bank of Canada was notified of 1 complaint received by the Office of the Privacy Commissioner (OPC). There was 1 privacy complaint carried over from the previous reporting period, which was resolved in the current reporting period. There is 1 outstanding complaint.

## Disclosures under Paragraph 8(2)(m)

Paragraph 8(2)(m) allows for disclosure of personal information where the public interest clearly outweighs any invasion of privacy that could result from the disclosure of the information or where disclosure clearly benefit the individual to whom the information relates. There was no disclosure of personal information made pursuant to subsection 8(2)(m) during this reporting period.

## Material privacy breaches

According to the Treasury Board of Canada Secretariat, a material privacy breach involves: a breach of sensitive personal information, and could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals. No material privacy breaches involving the Bank of Canada occurred during this reporting period.

In collaboration with the Bank's Corporate Security Services and Information Technology Services department, the ATIP Office monitors incidents of lost or stolen Bank issued devices, including those that may contain personally identifiable information. Privacy incidents are investigated by the ATIP Office and affected individuals are notified, as required.

## Assessment of privacy issues

ATIP Office resource time was spent working on client activities involving the management of personal information, including the completion of two Privacy Impact Assessments on Bank initiatives. One concerned the modernization of the Bank's Unclaimed Balances Management System and procedures. The second assessment, which built on a PIA completed in the previous reporting period, focused on the processes and information flows specific to the implementation of a cloud solution for Human Resources activities, prior to migration to the new system. Summaries of the PIAs are available upon request.

In addition to the formal Privacy Impact Assessments, advice was provided to numerous business areas within the Bank concerning the appropriate management of personal information through the completion of privacy checklists. Fifty-five (55) initiatives were



reviewed by the ATIP Office to determine if the proposed initiatives pose any risk to privacy and if a formal PIA is warranted. The nature of the initiatives reviewed range from HR projects, IT technology upgrades, third party contracting arrangements including Requests for Proposals, and the acquisition of data sets. The number of privacy reviews is consistent with those completed in the previous reporting period and continues to demonstrate an awareness at the Bank of the need to consider privacy risks in Bank initiatives. In addition, the ATIP Office provided advice to various business units concerning privacy requirements related to the collection and use of personal information gathered through surveys.

Every three years, the Bank undertakes a work environment survey. The ATIP Office works closely with the Bank's Human Resources department and the third-party service provider who conducts the survey on behalf of the Bank to ensure that the privacy of Bank employees is preserved through the survey process. This involves providing clear notice to employees on what information the Bank will receive. The ATIP Office does an exhaustive review of the commentary reports to ensure that any personally identifiable information is removed from the commentary prior to the distribution of the reports. This is a resource intense exercise requiring careful scrutiny to ensure that the privacy of Bank employees is preserved, and to bolster staff confidence in the confidentiality of the survey process.

## Operational Environment

This year, the number of requests received was relatively similar to the previous year; however, the new requests combined with voluminous privacy and access to information requests carried over from the previous reporting period accounted for a heavy workload for the ATIP Office. In particular, one privacy request was considered complex in nature as it involved a very large number of records and contained information of the requester co-mingled with that of other individuals. As well as processing privacy requests, the ATIP Office dealt with a substantial volume of records associated with *Access to Information Act* requests, consultations, and complaints. Considerable ATIP resource time was also spent on privacy compliance activities, including privacy reviews and awareness sessions, monitoring incidents for possible privacy breaches, updating Personal Information Banks (PIBs) for the Bank's Info Source chapter, as well as participating on various Bank committees to ensure the Bank's management of personal information is compliant with the *Privacy Act*. The combination of these activities resulted in a very heavy workload for the ATIP Office.

Although the ATIP Office was reorganized and a new full-time position was added to the staff complement, the reorganization was not fully implemented until the final quarter of this reporting period. In addition, during the reporting period, the ATIP Assistant position was vacant for a period of six months which affected workload in the ATIP Office.

In addition to administering the Bank's ATIP program, the ATIP Office is also responsible for coordinating the Bank's responses to Parliamentary Questions. The General Counsel and Corporate Secretary, and the Deputy Corporate Secretary and Access to Information and Privacy Coordinator have delegated responsibility for responding to written Parliamentary questions. Similar to ATIA requests, the Bank saw a slight decrease in the number of Parliamentary Questions received and completed, 33 in the current year compared to 44 in 2016-2017. However, several of these questions were complex and had resource implications for the Bank. All responses to Parliamentary Questions are reviewed to ensure that they comply with the

requirements of both the Access to Information and Privacy Acts. These factors, and heavy workloads in specific areas throughout the Bank, impacted the Bank's ability to respond to some requests within the legislated timeframe.

## Appendix A



## ATTACHMENT A

3 June 2013

To/A Jeremy Farr  
 General Counsel & Corporate Secretary

From/De Stephen S. Poloz  
 Governor

Marie Bordeleau  
 Deputy Corporate Secretary/ATIP Coordinator

**Subject/Objet: Delegation of Authority under the *Access to Information Act* and the *Privacy Act***

The Governor of the Bank of Canada, pursuant to section 73 of the *Access to Information Act* and the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Governor as the head of a government institution, under the section of the Act set out in the schedule opposite each position.

| Position  | Schedule   |   |
|---|--|---|
|   | <i>Privacy Act</i> and Regulations                         | <i>Access to Information Act</i> and Regulations  |
| General Counsel & Corporate Secretary   | Full authority   | Full authority  |
| Deputy Corporate Secretary/<br>Access to Information and<br>Privacy Coordinator | Full authority   | Full authority  |
| ATIP Manager  | 15, and the mandatory provisions<br>of 26 for all records* | 8(1), 9, 11(2) to (6) inclusive,<br>and the mandatory provisions of<br>19(1) for all records* |

11 June 2013  
 Date

Governor Stephen Poloz

\*refer to attached table for specific delegation

**Table of Specific Delegation**

\* Responsibility Delegated to ATIP Manager – *Privacy Act*

| <b>Sections</b> | <b>Description</b>  | <b>Position</b> |
|-----------------|---|-----------------|
| 15              | Extend time limit for responding to request for access  | ATIP Manager    |
| 26              | May refuse to disclose information about another individual, and shall refuse to disclose such information where disclosure is prohibited under section 8 | ATIP Manager    |

\* Responsibility Delegated to ATIP Manager– *Access to Information Act*

| <b>Sections</b>        | <b>Description</b>        | <b>Position</b> |
|------------------------|---------------------------|-----------------|
| 8(1)                   | Transfer of request       | ATIP Manager    |
| 9                      | Extensions of time limits | ATIP Manager    |
| 11(2) to (6) inclusive | Fees                      | ATIP Manager    |
| 19(1)                  | Personal information      | ATIP Manager    |

## Appendix B

# Statistical Report on *Privacy Act*

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(1 April 2017 to 31 March 2018)





## Statistical Report on the *Privacy Act*

Name of institution: Bank of Canada

Reporting period: 2017-04-01 to 2018-03-31

### Part 1: Requests Under the *Privacy Act*

|  | Number of Requests |
|--|--------------------|
| Received during reporting period           | 4                  |
| Outstanding from previous reporting period | 2                  |
| <b>Total</b>                               | <b>6</b>           |
| Closed during reporting period             | 5                  |
| Carried over to next reporting period      | 1                  |

### Part 2: Requests Closed During the Reporting Period

#### 2.1 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               | 1             | 0             | 0              | 0               | 0               | 0                  | 1        |
| Disclosed in part            | 0               | 0             | 1             | 0              | 0               | 0               | 0                  | 1        |
| All exempted                 | 0               | 0             | 0             | 0              | 0               | 0               | 0                  | 0        |
| All excluded                 | 0               | 0             | 0             | 0              | 0               | 0               | 0                  | 0        |
| No records exist             | 2               | 0             | 0             | 0              | 0               | 0               | 0                  | 2        |
| Request abandoned            | 1               | 0             | 0             | 0              | 0               | 0               | 0                  | 1        |
| Neither confirmed nor denied | 0               | 0             | 0             | 0              | 0               | 0               | 0                  | 0        |
| <b>Total</b>                 | <b>3</b>        | <b>1</b>      | <b>1</b>      | <b>0</b>       | <b>0</b>        | <b>0</b>        | <b>0</b>           | <b>5</b> |

## 2.2 Exemptions

| Section  | Number of Requests | Section       | Number of Requests | Section | Number of Requests |
|----------|--------------------|---------------|--------------------|---------|--------------------|
| 18(2)    | 0                  | 22(1)(a)(i)   | 0                  | 23(a)   | 0                  |
| 19(1)(a) | 0                  | 22(1)(a)(ii)  | 0                  | 23(b)   | 0                  |
| 19(1)(b) | 0                  | 22(1)(a)(iii) | 0                  | 24(a)   | 0                  |
| 19(1)(c) | 0                  | 22(1)(b)      | 0                  | 24(b)   | 0                  |
| 19(1)(d) | 0                  | 22(1)(c)      | 0                  | 25      | 0                  |
| 19(1)(e) | 0                  | 22(2)         | 0                  | 26      | 0                  |
| 19(1)(f) | 0                  | 22.1          | 0                  | 27      | 1                  |
| 20       | 0                  | 22.2          | 0                  | 28      | 0                  |
| 21       | 0                  | 22.3          | 0                  |         |                    |

## 2.3 Exclusions

| Section  | Number of Requests | Section  | Number of Requests | Section  | Number of Requests |
|----------|--------------------|----------|--------------------|----------|--------------------|
| 69(1)(a) | 0                  | 70(1)    | 0                  | 70(1)(d) | 0                  |
| 69(1)(b) | 0                  | 70(1)(a) | 0                  | 70(1)(e) | 0                  |
| 69.1     | 0                  | 70(1)(b) | 0                  | 70(1)(f) | 0                  |
|          |                    | 70(1)(c) | 0                  | 70.1     | 0                  |

## 2.4 Format of information released

| Disposition       | Paper | Electronic | Other formats |
|-------------------|-------|------------|---------------|
| All disclosed     | 1     | 0          | 0             |
| Disclosed in part | 1     | 0          | 0             |
| <b>Total</b>      | 2     | 0          | 0             |

## 2.5 Complexity

### 2.5.1 Relevant pages processed and disclosed

| Disposition of Requests      | Number of Pages Processed | Number of Pages Disclosed | Number of Requests |
|------------------------------|---------------------------|---------------------------|--------------------|
| All disclosed                | 2                         | 2                         | 1                  |
| Disclosed in part            | 23                        | 23                        | 1                  |
| All exempted                 | 0                         | 0                         | 0                  |
| All excluded                 | 0                         | 0                         | 0                  |
| Request abandoned            | 0                         | 0                         | 1                  |
| Neither confirmed nor denied | 0                         | 0                         | 0                  |
| <b>Total</b>                 | 25                        | 25                        | 3                  |

### 2.5.2 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                | 1                             | 2               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| Disclosed in part            | 1                             | 23              | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| All exempted                 | 0                             | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| All excluded                 | 0                             | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| Request abandoned            | 1                             | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| Neither confirmed nor denied | 0                             | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |
| <b>Total</b>                 | <b>3</b>                      | <b>25</b>       | <b>0</b>                | <b>0</b>        | <b>0</b>                 | <b>0</b>        | <b>0</b>                  | <b>0</b>        | <b>0</b>                       | <b>0</b>        |

### 2.5.3 Other complexities

| Disposition                  | Consultation Required | Legal Advice Sought | Interwoven Information | Other    | Total    |
|------------------------------|-----------------------|---------------------|------------------------|----------|----------|
| All disclosed                | 0                     | 0                   | 0                      | 0        | 0        |
| Disclosed in part            | 0                     | 0                   | 0                      | 0        | 0        |
| All exempted                 | 0                     | 0                   | 0                      | 0        | 0        |
| All excluded                 | 0                     | 0                   | 0                      | 0        | 0        |
| Request abandoned            | 0                     | 0                   | 0                      | 0        | 0        |
| Neither confirmed nor denied | 0                     | 0                   | 0                      | 0        | 0        |
| <b>Total</b>                 | <b>0</b>              | <b>0</b>            | <b>0</b>               | <b>0</b> | <b>0</b> |

## 2.6 Deemed refusals

### 2.6.1 Reasons for not meeting statutory deadline

| Number of Requests Closed Past the Statutory Deadline | Principal Reason |                       |                       |       |
|---|------------------|-----------------------|-----------------------|-------|
|   | Workload         | External Consultation | Internal Consultation | Other |
| 0   | 0                | 0                     | 0                     | 0     |



## 2.6.2 Number of days past deadline

| Number of Days Past Deadline | Number of Requests Past Deadline Where No Extension Was Taken | Number of Requests Past Deadline 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     |
| <b>Total</b>                 | 0   | 0   | 0     |

## 2.7 Requests for translation

| Translation Requests | Accepted | Refused | Total |
|----------------------|----------|---------|-------|
| English to French    | 0        | 0       | 0     |
| French to English    | 0        | 0       | 0     |
| <b>Total</b>         | 0        | 0       | 0     |

## Part 3: Disclosures Under Subsections 8(2) and 8(5)

| Paragraph 8(2)(e) | Paragraph 8(2)(m) | Subsection 8(5) | Total |
|-------------------|-------------------|-----------------|-------|
| 0                 | 0                 | 0               | 0     |

## Part 4: Requests for Correction of Personal Information and Notations

| Disposition for Correction Requests Received | Number |
|--|--------|
| Notations attached                           | 0      |
| Requests for correction accepted             | 0      |
| <b>Total</b>                                 | 0      |

## Part 5: Extensions

### 5.1 Reasons for extensions and disposition of requests

| Disposition of Requests Where an Extension Was Taken | 15(a)(i)<br>Interference With Operations | 15(a)(ii)<br>Consultation |       | 15(b)<br>Translation or Conversion |
|--|--|---------------------------|-------|------------------------------------|
|  |  | Section 70                | Other |                                    |
| All disclosed  | 0  | 0                         | 0     | 0                                  |
| Disclosed in part                                    | 0  | 0                         | 0     | 0                                  |
| All exempted   | 0  | 0                         | 0     | 0                                  |
| All excluded   | 0  | 0                         | 0     | 0                                  |
| No records exist                                     | 0  | 0                         | 0     | 0                                  |
| Request abandoned                                    | 0  | 0                         | 0     | 0                                  |
| <b>Total</b>   | 0  | 0                         | 0     | 0                                  |

## 5.2 Length of extensions

| Length of Extensions | 15(a)(i)<br>Interference with<br>operations | 15(a)(ii)<br>Consultation |       | 15(b)<br>Translation<br>purposes |
|----------------------|---|---------------------------|-------|----------------------------------|
|                      |   | Section 70                | Other |                                  |
| 1 to 15 days         | 0   | 0                         | 0     | 0                                |
| 16 to 30 days        | 0   | 0                         | 0     | 0                                |
| <b>Total</b>         | 0   | 0                         | 0     | 0                                |

## Part 6: Consultations Received From Other Institutions and Organizations

### 6.1 Consultations received from other Government of Canada institutions and other organizations

| Consultations                                  | Other<br>Government of<br>Canada<br>Institutions | Number of Pages<br>to Review | Other<br>Organizations | Number of Pages<br>to Review |
|--|--|------------------------------|------------------------|------------------------------|
| Received during the reporting period           | 1  | 3                            | 0                      | 0                            |
| Outstanding from the previous reporting period | 0  | 0                            | 0                      | 0                            |
| <b>Total</b>                                   | 1  | 3                            | 0                      | 0                            |
| Closed during the reporting period             | 1  | 3                            | 0                      | 0                            |
| Pending at the end of the reporting period     | 0  | 0                            | 0                      | 0                            |

### 6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

| Recommendation            | Number of Days Required to Complete Consultation Requests |                  |                  |                      |                       |                       |                             | Total |
|---------------------------|---|------------------|------------------|----------------------|-----------------------|-----------------------|-----------------------------|-------|
|                           | 1 to 15<br>Days   | 16 to 30<br>Days | 31 to 60<br>Days | 61 to<br>120<br>Days | 121 to<br>180<br>Days | 181 to<br>365<br>Days | More<br>Than<br>365<br>Days |       |
| All disclosed             | 0   | 0                | 0                | 0                    | 0                     | 0                     | 0                           | 0     |
| Disclosed in part         | 0   | 1                | 0                | 0                    | 0                     | 0                     | 0                           | 1     |
| All exempted              | 0   | 0                | 0                | 0                    | 0                     | 0                     | 0                           | 0     |
| All excluded              | 0   | 0                | 0                | 0                    | 0                     | 0                     | 0                           | 0     |
| Consult other institution | 0   | 0                | 0                | 0                    | 0                     | 0                     | 0                           | 0     |
| Other                     | 0   | 0                | 0                | 0                    | 0                     | 0                     | 0                           | 0     |
| <b>Total</b>              | 0   | 1                | 0                | 0                    | 0                     | 0                     | 0                           | 1     |

### 6.3 Recommendations and completion time for consultations received from other organizations

| Recommendation            | Number of days required to complete consultation requests |               |               |                |                 |                 |                    |       |
|---------------------------|---|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------|
|                           | 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 | Total |
| All disclosed             | 0   | 0             | 0             | 0              | 0               | 0               | 0                  | 0     |
| Disclosed in part         | 0   | 0             | 0             | 0              | 0               | 0               | 0                  | 0     |
| All exempted              | 0   | 0             | 0             | 0              | 0               | 0               | 0                  | 0     |
| All excluded              | 0   | 0             | 0             | 0              | 0               | 0               | 0                  | 0     |
| Consult other institution | 0   | 0             | 0             | 0              | 0               | 0               | 0                  | 0     |
| Other                     | 0   | 0             | 0             | 0              | 0               | 0               | 0                  | 0     |
| <b>Total</b>              | 0   | 0             | 0             | 0              | 0               | 0               | 0                  | 0     |

## Part 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 Requests      | 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               |
| <b>Total</b>   | 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 Requests      | 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               |
| <b>Total</b>   | 0                              | 0               | 0                       | 0               | 0                        | 0               | 0                         | 0               | 0                              | 0               |

**Part 8: Complaints and Investigations Notices Received**

| Section 31 | Section 33 | Section 35 | Court action | Total |
|------------|------------|------------|--------------|-------|
| 1          | 0          | 1          | 0            | 2     |

**Part 9: Privacy Impact Assessments (PIAs)**

|                            |   |
|----------------------------|---|
| Number of PIA(s) completed | 2 |
|----------------------------|---|

**Part 10: Resources Related to the Privacy Act**

**10.1 Costs**

| Expenditures                      |          | Amount           |
|-----------------------------------|----------|------------------|
| Salaries                          |          | \$116,810        |
| Overtime                          |          | \$0              |
| Goods and Services                |          | \$39,123         |
| • Professional services contracts | \$36,160 |                  |
| • Other                           | \$2,963  |                  |
| <b>Total</b>                      |          | <b>\$155,933</b> |

**10.2 Human Resources**

| Resources                        | Person Years Dedicated to Privacy Activities |
|----------------------------------|--|
| Full-time employees              | 0.84   |
| Part-time and casual employees   | 0.00   |
| Regional staff                   | 0.00   |
| Consultants and agency personnel | 0.00   |
| Students                         | 0.00   |
| <b>Total</b>                     | <b>0.84</b>                                  |

**Note:** Enter values to two decimal places.