

Annual Report on the administration of the *Privacy Act*

(1 April 2018 to 31 March 2019)



June 2019

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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. It conducts analysis to identify and mitigate systemic risks, 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 vision and mandate. Every three years, the Bank establishes a medium-term plan (MTP) to set out its strategic direction, goals and indicators of success.

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). 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. During this reporting period, minor revisions were made to the Bank's Info Source publication, including updating various Personal Information Banks.

Staff Awareness Activities

During this reporting period, the ATIP Office delivered 77 awareness sessions (in both official languages) to 262 participants from various business units throughout the Bank. 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.

The ATIP Office delivered privacy training to specific business units within the Bank whose business processes involve the management of personal information, including privacy breach awareness training. For example, the ATIP Office developed and delivered a joint workshop with key stakeholders in the Human Resources Department. The purpose of this workshop was to expand the stakeholder knowledge of the application of the Privacy Act 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 underlying 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.

Work has also begun on modernizing and enhancing the ATIP awareness program through the development of on-line learning modules. These modules will be supplemented with interactive

discussions with the ATIP Office staff. This initiative leverages technology and permits the ATIP Office to communicate with Bank staff about ATIP matters in a new and engaging scenario-based format. The first module will be integrated with the Bank's employee orientation program. Additional modules to expand awareness and understanding are planned in the coming years.

In January 2019, the Bank implemented a one-year retention policy on all e-mail accounts. In advance of this implementation, the ATIP Office collaborated with the Bank's Knowledge and Information Management Services on a Bank-wide campaign, assisted in mandatory information sessions to Bank staff, highlighting the importance of good records management and provided guidance on corporate records retention. The implementation of the e-mail retention policy will ensure that corporate records are properly managed and are readily retrievable in response to ATIP requests.

The ATIP Office briefs Senior Management and the Board of Directors regularly on operational metrics and annually on the overall administration of the ATIP function, as well as reporting on ATIA priorities through departmental quarterly Entente Progress Reports, and through the Bank's Enterprise Risk Management reporting process.

Institution-specific privacy related policies, guidelines and procedures

During this reporting period, the ATIP Office collaborated with Bank stakeholders to develop a privacy playbook as part of the Bank's Cyber Incident Response Plan. Work was also undertaken to enhance privacy breach reporting tools to better assess and track privacy breaches

During this reporting period, the ATIP Office collaborated with various Bank stakeholders including, Legal Services, Human Resources, Corporate Security and IT Services, to formalize procedures and approvals related to granting access to employee files and e-mail accounts when employees are absent or have left the Bank. In addition, the ATIP Office revised the Privacy Risk Management Questionnaire as part of the broader Bank initiative related to Third Party Risk Management.

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. The ATIP Office also introduced Lessons Learned sessions for ATIP Analysts in order to facilitate knowledge sharing among team members and to ensure consistency in the processing of requests.

Interpretation of the Statistical Report (Appendix B)

Privacy Requests

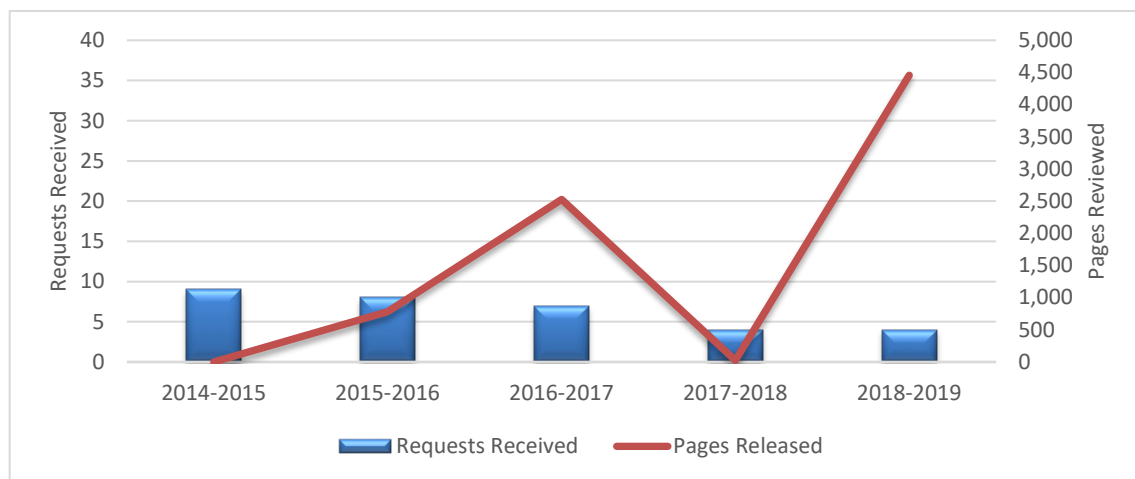
This year, the Bank received 5 formal requests for access to personal information made pursuant to the *Privacy Act* compared to 4 requests during the previous reporting period. The table and chart below provide an overview of privacy requests received by the Bank for the past five years and the number of pages processed. Two privacy requests closed in this reporting period accounted for 100% of the pages processed as documented in Table 1.

Of note, one closed request was particularly complex and voluminous requiring a search through approximately 17,000 pages, which resulted in extended processing time.

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 |
|-------------|-------------------|---|--------------------|---------------------------|
| 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 |
| 2018-2019 | 5 | 1 | 5 | 4,457 |

Chart 1: Number of privacy requests and pages released, 2014-2015 to 2018-2019



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, individuals may choose to proceed informally to gain access to their personal information through existing informal channels. 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. Furthermore, simple informal requests for access to personal information made by Bank of Canada employees are responded to by the Bank's Human Resources Department. However, informal requests that are more complex in nature, that necessitate a careful review prior to disclosure, are handled informally by the ATIP Office.

In addition, individuals may also choose to submit an informal request for access to personal information directly to the Bank's ATIP Office. In this reporting period, the ATIP Office responded to three informal privacy requests for which 8,789 pages were processed and disclosed. Requests that are processed informally through the ATIP Office are not reflected in the Statistical Report on the *Privacy Act*; however, they require the same diligence and resource effort.

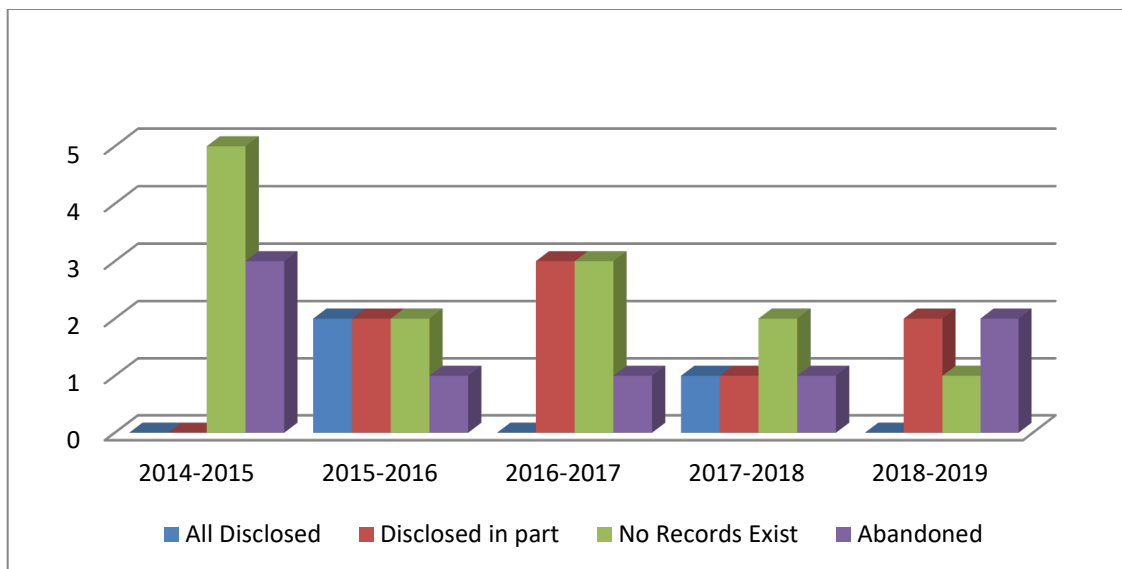
Disposition of Requests

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 2014-2019

| Fiscal Year | All Disclosed | Disclosed in part | No Records Exist | Abandoned |
|-------------|---------------|-------------------|------------------|-----------|
| 2014-2015 | 0 | 0 | 5 | 3 |
| 2015-2016 | 2 | 2 | 2 | 1 |
| 2016-2017 | 0 | 3 | 3 | 1 |
| 2017-2018 | 1 | 1 | 2 | 1 |
| 2018-2019 | 0 | 2 | 1 | 2 |

Chart 2: Disposition of Requests, 2014-2015 to 2018-2019

Exemptions Invoked

The exemption provisions invoked during this reporting period include section 26 (information about other individuals) and section 27 (personal information that is subject to solicitor-client privilege) each of which were invoked in two requests. Other exemptions, namely section 25 (safety of the individual) and sections 19(1)(a) (personal information obtained in confidence from a government of a foreign state or institution thereof) and 19(1)(d) (personal information obtained in confidence from a municipal or regional government) were each invoked once.

Extensions

Two (2) of the requests closed by the Bank of Canada in 2018-2019 were complex in nature and involved a large volume of records. As a result, the Bank claimed extensions under 15(1)(a)(i).

Completion Time

Of the 5 requests completed during this reporting period, all but one (1) were closed within the statutory deadline.

Complaints and Investigations

During this reporting period, the Bank of Canada did not receive any complaints from the Office of Privacy Commissioner of Canada (OPC), compared to 1 in the previous reporting period. There was 1 privacy complaint carried over from the previous reporting period which is still outstanding.

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. During this reporting period, one privacy breach involving the personal information of five individuals was reported to the OPC. The Bank investigated the incident and remedial action was taken to prevent future incidents of a similar nature.

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 one Privacy Impact Assessment (PIA) on a major Bank initiative involving the implementation of cloud-based technology. A second PIA involving the implementation of other cloud-based applications was initiated in this reporting period. Two additional PIAs related to security and access control procedures were also initiated in this reporting period. 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. Thirty-five (35) 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 and program changes, IT technology upgrades, third party contracting arrangements including Requests for Proposals, and the acquisition of data sets. The number of privacy reviews demonstrates 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 and the video and audio recording of presentations and information session.

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, two privacy requests were considered complex in nature as they involved a very large number of records and contained information of the requesters 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.

As well as 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. The Bank received 40 Parliamentary Questions in this reporting year compared to 33 in the previous reporting period. 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 responsibilities also contributed to the heavy workload for the ATIP Office in this reporting period.

The ATIP Office also has extensive involvement in new Bank initiatives and process changes involving the management of sensitive information, including personal information. Considerable resource time is dedicated to providing policy advice to Bank stakeholders to ensure awareness of the requirements of ATIP legislation and the practical application of these requirements in business processes.

In addition to a heavy workload, the ATIP Office experienced a resource shortage. Two ATIP Analyst positions as well as the ATIP Assistant role were vacant for a period of several months during this reporting period which affected the workload of the ATIP Office. Despite the constraints, the ATIP Office was able to clear a back-log of requests.

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/ Access to Information and Privacy Coordinator | Full authority | Full authority |
| ATIP Manager | 15, and the mandatory provisions of 26 for all records* | 8(1), 9, 11(2) to (6) inclusive, and the mandatory provisions of 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*

| Sections | Description | Position |
|-----------------|---|-----------------|
| 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*

| Sections | Description | Position |
|------------------------|---------------------------|-----------------|
| 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*

(1 April 2018 to 31 March 2019)





Statistical Report on the *Privacy Act*

Name of institution: Bank of Canada

Reporting period: 2018-04-01 to 2019-03-31

Part 1: Requests Under the *Privacy Act*

| | Number of Requests |
|--|--------------------|
| Received during reporting period | 5 |
| Outstanding from previous reporting period | 1 |
| Total | 6 |
| 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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 2 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| No records exist | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Request abandoned | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 2 | 1 | 1 | 0 | 0 | 0 | 1 | 5 |

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) | 1 | 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) | 1 | 22(1)(c) | 0 | 25 | 1 |
| 19(1)(e) | 0 | 22(2) | 0 | 26 | 2 |
| 19(1)(f) | 0 | 22.1 | 0 | 27 | 2 |
| 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 | 0 | 0 | 0 |
| Disclosed in part | 0 | 2 | 0 |
| Total | 0 | 2 | 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 | 0 | 0 | 0 |
| Disclosed in part | 4457 | 4457 | 2 |
| All exempted | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 2 |
| Neither confirmed nor denied | 0 | 0 | 0 |
| Total | 4457 | 4457 | 4 |

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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 4457 | 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 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 2 | 0 | 0 | 0 | 0 | 0 | 2 | 4457 | 0 | 0 |

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 | 1 | 1 | 0 | 2 |
| 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 |
| Total | 0 | 1 | 1 | 0 | 2 |

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 |
| 1 | 1 | 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 | 1 | 1 |
| Total | 0 | 1 | 1 |

2.7 Requests for translation

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

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

| Disposition of Requests Where an Extension Was Taken | 15(a)(i) Interference With Operations | 15(a)(ii) Consultation | | 15(b) Translation or Conversion |
|--|--|---------------------------|-------|------------------------------------|
| | | Section 70 | Other | |
| All disclosed | 0 | 0 | 0 | 0 |
| Disclosed in part | 2 | 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 |
| Total | 2 | 0 | 0 | 0 |

5.2 Length of extensions

| Length of Extensions | 15(a)(i) Interference with operations | 15(a)(ii) Consultation | | 15(b) Translation purposes |
|----------------------|---|---------------------------|-------|----------------------------------|
| | | Section 70 | Other | |
| 1 to 15 days | 0 | 0 | 0 | 0 |
| 16 to 30 days | 2 | 0 | 0 | 0 |
| Total | 2 | 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 Government of Canada Institutions | Number of Pages to Review | Other Organizations | Number of Pages to Review |
|--|--|------------------------------|------------------------|------------------------------|
| Received during the reporting period | 0 | 0 | 0 | 0 |
| Outstanding from the previous reporting period | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |
| Closed during the reporting period | 0 | 0 | 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 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 | 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 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

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 |
| Total | 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 |
| 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 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 |
| Total | 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 |
|------------|------------|------------|--------------|-------|
| 0 | 0 | 0 | 0 | 0 |

Part 9: Privacy Impact Assessments (PIAs)

| | |
|----------------------------|---|
| Number of PIA(s) completed | 1 |
|----------------------------|---|

Part 10: Resources Related to the Privacy Act

10.1 Costs

| Expenditures | | Amount |
|-----------------------------------|----------|------------------|
| Salaries | | \$193,101 |
| Overtime | | \$0 |
| Goods and Services | | \$25,728 |
| • Professional services contracts | \$24,945 | |
| • Other | \$783 | |
| Total | | \$218,829 |

10.2 Human Resources

| Resources | Person Years Dedicated to Privacy Activities |
|----------------------------------|--|
| Full-time employees | 1.30 |
| Part-time and casual employees | 0.00 |
| Regional staff | 0.00 |
| Consultants and agency personnel | 0.00 |
| Students | 0.00 |
| Total | 1.30 |

Note: Enter values to two decimal places.