

Annual Report on the administration of the *Privacy Act*

(1 April 2015 to 31 March 2016)



June 2016

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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.

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.

The Bank’s *Info Source* chapter: Sources of Federal Government and Employee Information, which organizes the Bank’s personal information holdings in Personal Information Banks, is available on the Bank’s website. The Bank’s website also contains helpful information to assist individuals interested in requesting information.

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, 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 administers and advises on the public debt and foreign exchange reserves.

In addition, a strong management and operating framework provides the foundation for the Bank of Canada's core functions and activities. Efficient, cost-effective and innovative operations promote employee engagement and productivity in the workplace and contribute to the achievement of the themes and business objectives outlined in the medium-term plan.

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 section 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 senior analysts and 3 junior analysts are responsible for coordinating the processing of ATIP requests, consultations and complaints, providing advice and promoting ATIP awareness to staff and the general public. The ATIP section 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.

Staff Awareness Activities

During this reporting period, the ATIP Office delivered 16 awareness sessions to approximately 346 participants from various business units throughout the Bank. The purpose of these sessions was to increase awareness of the general principles of the Act, the roles and responsibilities of Bank employees with respect to the Act related to the processing of requests and the appropriate management of personal information as part of the initiation of projects and the procuring of services which involve the management of personal information. The sessions incorporated both official languages. Several of these sessions were delivered in collaboration with the Bank's Compliance Office in order to highlight for Bank staff the link between their responsibilities with respect to the Act and the Bank's Code of Business Conduct and Ethics.

The Bank's practice is to brief Senior Management and the Board of Directors at least annually on ATIP matters.

Institution-specific privacy related policies, guidelines and procedures

In 2014-2015, the Office of the Privacy Commissioner of Canada conducted an audit of privacy and portable storage devices to assess whether the selected entities have implemented adequate controls- including policies, procedures and processes – to protect personal information transmitted to, and stored on portable storage devices. There were no common recommendations applicable to the Bank, as the Bank had appropriate processes and practices in place for all of these lines of enquiry. The audit did result in one specific recommendation for the Bank to implement controls to address the connection of unauthorised USB storage devices and the use of CD/DVDs to store data. The Bank has since implemented the requisite controls to address this recommendation.

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 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.

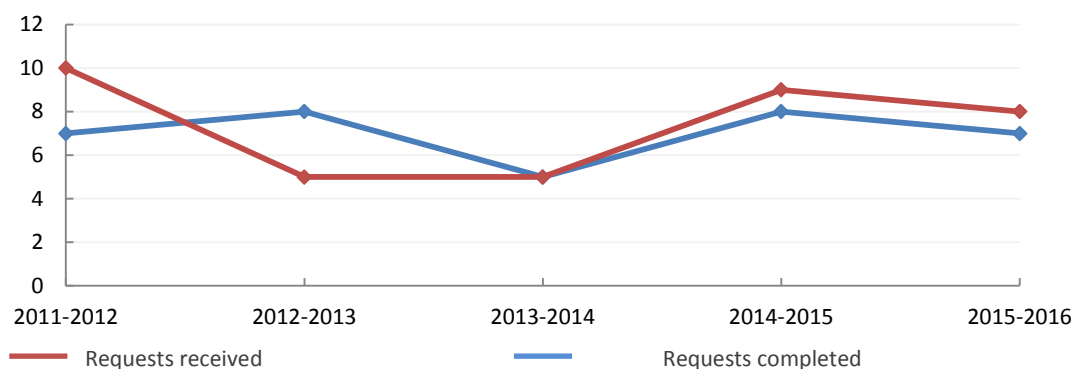
Interpretation of the Statistical Report

The Statistical Report regarding *Privacy Act* (PA) requests is attached as Appendix B.

The Bank of Canada received 8 formal applications for personal information under the Act during this reporting period compared to 9 in the previous reporting period. Seven requests were completed in the reporting period and two were carried forward to the next reporting period. The number of pages processed was 782 compared to 0 in the previous reporting period.

A summary of the requests received and completed during 2011-2016 is presented in the graph below.

Chart1: Privacy Requests Received and Completed



Disposition of Completed Requests

A summary of the disposition of the privacy requests completed during the reporting periods of 2011-2016 is presented in the table below.

Table 1: Disposition of Completed Requests

A summary of the disposition of the privacy requests completed during the reporting periods of 2011-2016

Fiscal Year	All Disclosed	Disclosed in part	No Records Exist	Abandoned
2011-2012	2	0	3	2
2012-2013	1	2	1	4
2013-2014	1	1	2	1
2014-2015	0	0	5	3
2015-2016	2	2	2	1

Exemptions Invoked

Section 26 was invoked in 2 requests which related to personal information about another individual other than the requester.

Extensions

None of the 7 requests required a time extension. This is the same as reported in 2014-2015.

Completion Time

Of the 7 requests completed, 6 were closed on time. One request was completed within 31-60 days.

The ATIP Office meets on a weekly basis to monitor the progress on outstanding requests, consultations and complaints.

Complaints and Investigations

There were no complaints during this reporting period.

Disclosures under Paragraph 8(2)(m)

There was no disclosure of personal information made pursuant to subsection 8(2)(m) during this reporting period.

Material privacy breaches

No material privacy breaches occurred during this reporting period involving the Bank of Canada.

Assessment of privacy issues

During the current reporting period, the Bank completed two Privacy Impact Assessments (PIAs) as described below, in order to assess compliance of the various initiatives with privacy requirements related to the collection, use, retention, disclosure and disposal of personal information. Summaries of the PIAs are available upon request.

- A PIA was completed for the implementation of a mandatory fingerprinting directive as part of the Bank's security screening process.
- A PIA was completed on the Bank's move to a cloud based HR solution.

In addition, over 52 privacy reviews were completed by the ATIP Office on a variety of initiatives. The purpose of these reviews is to determine if a proposed initiative poses any risk to privacy and if a formal PIA is warranted. The nature of the initiatives ranges from HR projects, surveys, IT technology upgrades, third party contracting arrangements. The number of privacy reviews represents a considerable increase over the past years and demonstrates an awareness of the need to consider privacy risks in Bank initiatives.

Appendix A



BANK OF CANADA
BANQUE DU CANADA

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 the *Privacy Act*Name of institution: Bank of CanadaReporting period: 2015-04-01 to 2016-03-31**Part 1: Requests Under the *Privacy Act***

	Number of Requests
Received during reporting period	8
Outstanding from previous reporting period	1
Total	9
Closed during reporting period	7
Carried over to next reporting period	2

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	2	0	0	0	0	0	0	2
Disclosed in part	0	1	1	0	0	0	0	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	2	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
Total	3	3	1	0	0	0	0	7

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	2
19(1)(f)	0	22.1	0	27	0
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	2	0	0
Disclosed in part	2	0	0
Total	4	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	49	49	2
Disclosed in part	733	733	2
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	1
Neither confirmed nor denied	0	0	0
Total	782	782	5

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	2	49	0	0	0	0	0	0	0	0
Disclosed in part	0	0	1	115	1	618	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
Total	3	49	1	115	1	618	0	0	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	0	0	1	1
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	0	0	1	1

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	0	0	0	1

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	1	0	1
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	1	0	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	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
Total	0	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	0	0	0	0
Total	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 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

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	2
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Part 10: Resources Related to the Privacy Act

10.1 Costs

Expenditures	Amount
Salaries	\$108,444
Overtime	\$0
Goods and Services	\$59,962
• Professional services contracts	\$59,325
• Other	\$637
Total	\$168,406

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.87
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.87