

Annual Report on the administration of the *Access to Information Act*

(1 April 2015 to 31 March 2016)



June 2016

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Introduction

Purpose of the *Access to Information Act* (ATIA)

As set out in Section 2(1) of the *Access to Information Act*, the purpose of this Act is “to extend the present laws of Canada to provide a right of access to information in records under the control of a government institution in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific and that decisions on the disclosure of government information should be reviewed independently of government.” This report is prepared in accordance with Section 70(1)(d) of the Act and is tabled in Parliament in accordance with Section 72.

Subsection 2(2) of the Act is intended to complement and not replace existing procedures for access to government information. The Bank of Canada responds to informal public inquiries through its Communications Department and also on an ad hoc basis throughout the organization. The Bank occasionally receives formal requests for information which is normally available to the general public; in these cases, the Bank handles such requests informally through normal channels including the Bank’s Public Information Services whenever possible.

On a monthly basis, the Bank publishes a summary of completed ATIA requests. In addition, the Bank’s chapter of *Info Source: Sources of Federal Government and Employee Information* 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 *Access to Information Act*

Delegation of Authority

Under Section 70(2) of the Act, the Governor of the Bank of Canada undertakes the responsibilities of the designated Minister for the purposes of subsections 70(1)(a) and (c).

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 and transferring requests, has been delegated to the ATIP Manager. A copy of the Bank's Delegation Order is attached (Attachment A).

Organizational Structure to Fulfill *Access to Information 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 senior analysts and 3 junior analysts 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 general 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 various files, including confirming Cabinet Confidences.

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. In addition, the Chief of Staff to the Governor and Senior Deputy Governor and senior staff in the Communications Department are provided with a copy of any proposed release so that they can assess and advise should there be media queries. These positions 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 17 awareness sessions to approximately 334 participants from various business lines within the Bank on the general principles of the Access to Information legislation and specifically how it is administered at the Bank. 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 ATIA and the Bank's Code of

Business Conduct and Ethics. The ATIP Office also provides informal training pertaining on the application of exemptions to employees on an as required basis during the processing of ATIA requests. The Bank's practice is to brief Senior Management and the Board of Directors at least annually on Access to Information matters.

Institution-specific access to information related policies, guidelines and procedures

As part of the Bank's on-going operational review, ATIA guidelines have been drafted and will be finalized this coming fiscal year.

The ATIP process benchmarking exercise, which was noted in the 2014-2015 Annual Report, is now complete. A subsequent LEAN process review was launched in this reporting period to assess Bank-wide ATIP processes in an effort to find efficiencies in the ATIP process with the view to reduce resource demands across the Bank. The outcome of the Lean Process will foster the continuous process improvement of the Bank's ATIP business.

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 (Appendix B)

The table below provides an overview of ATIA requests received by the Bank for the past five years.

Table 1: Overview of ATIA Requests Received and Completed

Fiscal Year	Requests Received	Requests Outstanding from previous reporting period	Requests completed	Number of pages processed
2011-2012	22	6	26	5,227
2012-2013	109	2	101	7,205
2013-2014	45	10	41	4,264
2014-2015	69	14	60	3,922
2015-2016	62	23	70	10,985

The Bank assists in processing ATIA requests received by another government institution when documents that pertain to the Bank are found to be among the records being processed by the other institution. The other organization will consult with the Bank to seek the Bank's recommendations with respect to the treatment of these records. The table below indicates the volume of consultations received by the Bank.

Table 2: Overview of Consultations Received and Completed

Fiscal Year	Consultations Received	Consultations remained outstanding from previous reporting period	Consultations completed	Number of Pages Reviewed
2011-2012	18	1	17	681
2012-2013	23	0	23	1418
2013-2014	24	2	26	2023
2014-2015	16	0	14	114
2015-2016	17	2	18	223

In addition to the formal requests for information, the Bank received, processed and completed 23 informal requests for records related to previously closed requests which are listed on the Bank's website.

Chart 1: Informal Requests Received & Completed, 2011-2016

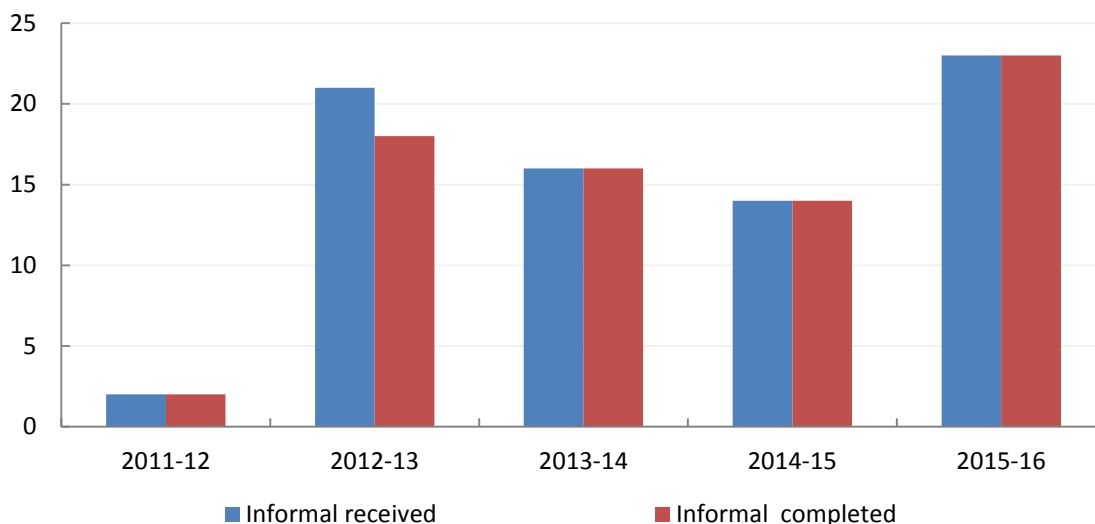
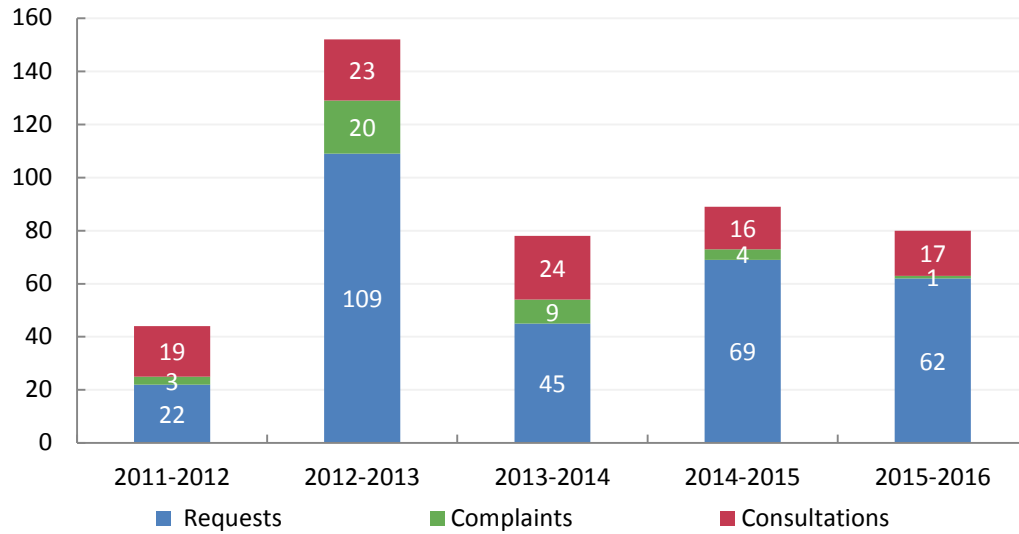


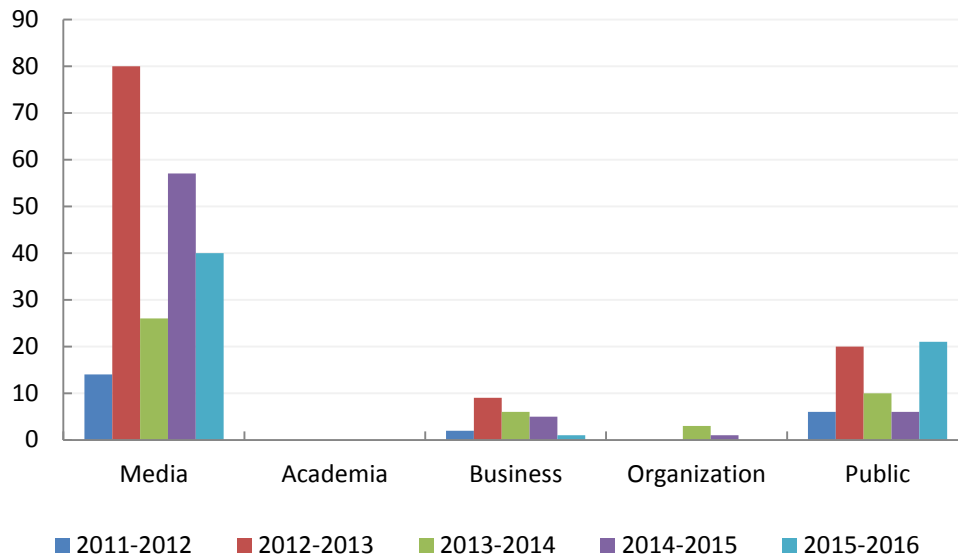
Chart 2: Number of ATIA requests, consultations and complaints received, 2011-2016



Requests under the ATIA by source

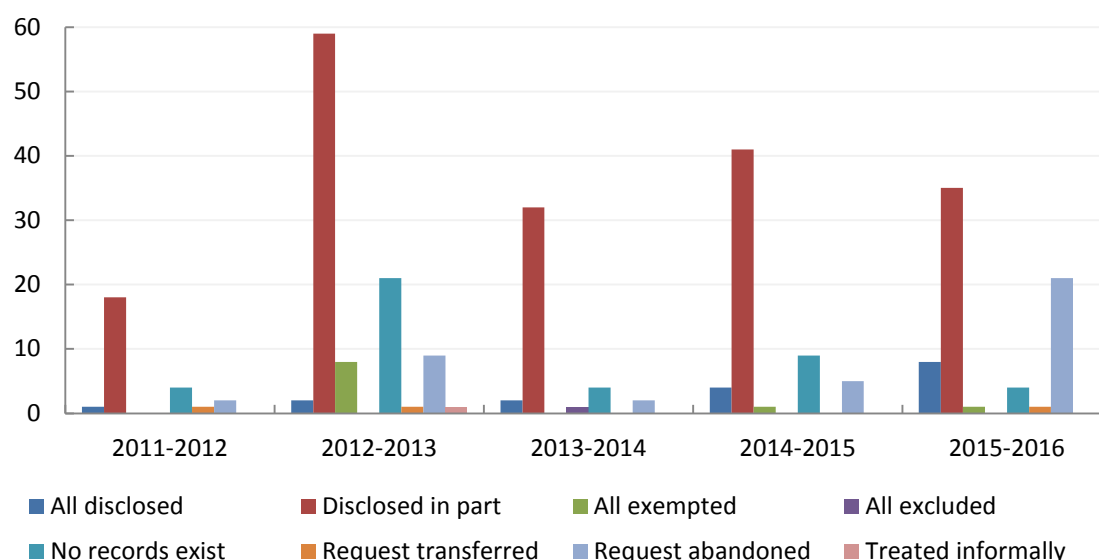
The greatest change seen this reporting period was the numbers of requests received from the public. This represents a 25% increase over the previous reporting period while media requests dropped by 17%.

Chart 3: Sources of Requests, 2011-2016



Disposition of Requests

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

Chart 4: Disposition of Requests, 2011-2016

Exemptions Invoked

The exemption provisions invoked most often in this reporting period were sections 21(1)(a) and (b) concerning records containing information related to the internal decision-making processes of the Bank, followed closely by section 18(d) with respect to the economic interests of Canada. The Bank also withheld information under one or more of sections 13(1)(a)(b), 15(1)(I.A), 16(2)(c), 16.5, 17, 19(1), 18(a)(b)(c), 19(1), 20(1)(a)(b)(c)(d), 21(1)(d), 22, 22.1(1) and 23 of the ATIA.

Extensions

There were 27 requests which required a time extension in order to consult numerous third parties or other government institutions. The ATIP staff endeavours to respect original and extended deadlines. They routinely keep the requester informed of the status of their requests. To prevent unnecessary delays, requesters are often consulted to obtain clarification to help narrow the scope of the information sought when appropriate.

Table 3: Extensions taken, 2011-2016

Year	30-day extension	60-day extension	90-day extension	180-days extension	Total Extensions
2011-2012	9	7	4	1	21
2012-2013	20	13	8	0	41
2013-2014	5	8	1	0	14
2014-2015	7	16	1	3	27
2015-2016	11	5	9	2	27

Completion Time

Of the 70 requests completed this reporting period, 56 (80%) were closed on time. This represents an increase of 18% from the previous reporting period, despite the fact that the Bank of Canada completed 17% more requests this reporting period than last. Of those requests that extended past the due date, the delay was due to on-going internal and external consultations and bank staff workload.

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

Complaints and Investigations

During this reporting period, the Bank of Canada was notified of 1 complaint received by the Office of the Information Commissioner compared to 4 complaints in 2014-2015.

The following table represents the number of complaints received, carried over from previous reporting period, and complaints resolved.

Table 4: Complaints received, carried over and resolved

Reporting period	Number of complaints received	Number of complaints carried over from previous reporting period	Complaints resolved	Number of Complaints Outstanding
2011-2012	3	0	0	3
2012-2013	20	3	4	19
2013-2014	9	19	13	15
2014-2015	4	15	9	10
2015-2016	1	10	4	7

Fees

The Bank of Canada assesses fees in accordance with those set out in the Access to Information Regulations, and normally requires that applicable fees be paid. Fees in the amount of \$190.00 were collected during this reporting period for formal requests made under the Act, compared to \$265.00 in 2014-2015.

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

Government
of CanadaGouvernement
du Canada**Statistical Report on the *Access to Information Act***Name of institution: Bank of CanadaReporting period: 2015-04-01 to 2016-03-31**Part 1: Requests Under the *Access to Information Act*****1.1 Number of requests**

	Number of Requests
Received during reporting period	62
Outstanding from previous reporting period	23
Total	85
Closed during reporting period	70
Carried over to next reporting period	15

1.2 Sources of requests

Source	Number of Requests
Media	40
Academia	0
Business (private sector)	1
Organization	0
Public	21
Decline to Identify	0
Total	62

1.3 Informal requests

Completion Time							Total
1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
16	4	2	0	0	0	1	23

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

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	1	3	3	1	0	0	0	8
Disclosed in part	1	11	9	6	1	7	0	35
All exempted	0	1	0	0	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	3	0	0	0	1	0	0	4
Request transferred	1	0	0	0	0	0	0	1
Request abandoned	21	0	0	0	0	0	0	21
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	27	15	12	7	2	7	0	70

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	5	16(2)	0	18(a)	4	20.1	0
13(1)(b)	6	16(2)(a)	0	18(b)	8	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	1	20.4	0
13(1)(d)	0	16(2)(c)	16	18(d)	17	21(1)(a)	15
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	24
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	0
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	0	21(1)(d)	5
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	3
15(1)	0	16.1(1)(d)	0	19(1)	22	22.1(1)	2
15(1) - I.A.*	12	16.2(1)	0	20(1)(a)	1	23	1
15(1) - Def.*	0	16.3	0	20(1)(b)	13	24(1)	0
15(1) - S.A.*	0	16.4(1)(a)	0	20(1)(b.1)	0	26	0
16(1)(a)(i)	0	16.4(1)(b)	0	20(1)(c)	7		
16(1)(a)(ii)	0	16.5	1	20(1)(d)	1		
16(1)(a)(iii)	0	17	4				
16(1)(b)	0						
16(1)(c)	0						
16(1)(d)	0						

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

2.3 Exclusions

2

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
68(a)	0	69(1)	0	69(1)(g) re (a)	1
68(b)	0	69(1)(a)	0	69(1)(g) re (b)	0
68(c)	0	69(1)(b)	0	69(1)(g) re (c)	1
68.1	0	69(1)(c)	0	69(1)(g) re (d)	1
68.2(a)	0	69(1)(d)	0	69(1)(g) re (e)	2
68.2(b)	0	69(1)(e)	0	69(1)(g) re (f)	1
		69(1)(f)	0	69.1(1)	0

2.4 Format of information released

Disposition	Paper	Electronic	Other Formats
All disclosed	8	0	0
Disclosed in part	27	8	0
Total	35	8	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	154	154	8
Disclosed in part	10831	10831	35
All exempted	1	0	1
All excluded	0	0	0
Request abandoned	0	0	21
Neither confirmed nor denied	0	0	0

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	8	154	0	0	0	0	0	0	0	0
Disclosed in part	25	463	3	892	4	2434	3	7042	0	0
All exempted	1	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	21	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	55	617	3	892	4	2434	3	7042	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Assessment of Fees	Legal Advice Sought	Other	Total
All disclosed	1	0	0	2	3
Disclosed in part	21	0	3	5	29
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor	0	0	0	0	0
Total	22	0	3	7	32

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
14	3	4	5	2

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	2	1	3
16 to 30 days	1	1	2
31 to 60 days	1	1	2
61 to 120 days	1	3	4
121 to 180 days	0	1	1
181 to 365 days	0	2	2
More than 365 days	0	0	0
Total	5	9	14

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: Extensions

3.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
All disclosed	0	0	0	0
Disclosed in part	2	0	13	12
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	13	12

3.2 Length of extensions

Length of Extensions	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
30 days or less	1	0	9	1
31 to 60 days	0	0	1	4
61 to 120 days	1	0	1	2
121 to 180 days	0	0	2	3
181 to 365 days	0	0	0	2
365 days or more	0	0	0	0
Total	2	0	13	12

Part 4: Fees

Fee Type	Fee Collected		Fee Waived or Refunded	
	Number of Requests	Amount	Number of Requests	Amount
Application	38	\$190	2	\$10
Search	0	\$0	0	\$0
Production	0	\$0	0	\$0
Programming	0	\$0	0	\$0
Preparation	0	\$0	0	\$0
Alternative format	0	\$0	0	\$0
Reproduction	0	\$0	0	\$0
Total	38	\$190	2	\$10

Part 6: Completion Time of Consultations on Cabinet Confidences

6.1 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	2	14	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	2	14	0	0	0	0	0	0	0	0

6.2 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 7: Complaints and Investigations

Section 32	Section 35	Section 37	Total
1	1	4	6

Part 8: Court Action

Section 41	Section 42	Section 44	Total
0	0	0	0

Part 9: Resources Related to the Access to Information Act
9.1 Costs

Expenditures		Amount
Salaries		\$598,864
Overtime		\$0
Goods and Services		\$13,533
• Professional services contracts	\$7,096	
• Other	\$6,437	
Total		\$612,397

9.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	5.69
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	5.69

Note: Enter values to two decimal places.