

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

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(1 April 2019 to 31 March 2020)



August 2020

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# Contents

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<b>Introduction</b>	<b>3</b>
Purpose of the <i>Privacy Act</i>	3
The Bank of Canada's mandate	3
Monetary Policy	3
Financial System	3
Currency	3
Funds Management	3
<b>Administration of the <i>Privacy Act</i></b>	<b>3</b>
Delegation of Authority	3
Organizational Structure to Fulfill <i>Privacy Act</i> Responsibilities	4
Information Holdings	4
Staff Awareness Activities	4
Institution-specific privacy related policies, guidelines and procedures	5
Monitoring Processing	5
<b>Interpretation of the Statistical Report (Appendix B)</b>	<b>6</b>
Privacy Requests	6
Informal Requests	7
Disposition of Requests	7
Exemptions Invoked	9
Extensions	9
Completion Time	9
Complaints and Investigations	9
Disclosures under Paragraph 8(2)(m)	10
Material privacy breaches	11
Assessment of privacy issues	11
<b>Operational Environment</b>	<b>11</b>
<b>Appendix A</b>	<b>13</b>
<b>Appendix B</b>	<b>15</b>
<b>Appendix C</b>	<b>24</b>

## 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 a stable and efficient financial system by assessing systemic risks, overseeing major payment clearing and settlement systems and acting as the ultimate supplier of liquidity and lender of last resort.

#### *Currency*

The Bank designs, issues and distributes Canada’s bank notes. It also 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 support 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.

## 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 the updating of one Personal Information Bank and progress on the development of several new ones.

## Staff Awareness Activities

During this reporting period, the ATIP Office delivered 27 awareness sessions (in both official languages) to 173 participants from various 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* (PA) and how they are administered at the Bank. These sessions are delivered for new employee and student orientation as well as to teams or departments within the Bank as required.

The ATIP Office also provided informal training to employees pertaining to the application of specific exemptions and guidance for departmental contacts, as required, during the processing of ATIA requests.

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, privacy awareness sessions, workshops and training for data onboarding for employees working with sensitive datasets. The ATIP Office has seen an increasing demand for privacy training and refresher sessions specifically for employees involved in the onboarding of sensitive datasets.

The ATIP Office completed its work on modernizing and enhancing its approach for delivering ATIP awareness through the development of an on-line learning module. This initiative leverages technology that permits the ATIP Office to offer training to Bank staff in new and engaging scenario-based formats. The first module for general ATIP awareness was integrated into the

Bank's employee orientation program and is available to all staff through the Bank's Performance and Development program. An additional module concerning privacy breaches is nearing completion with plans for future modules over the next reporting period.

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 in the development of a Third Party Risk Management Framework (TPRM) and Privacy Risk Management Questionnaire, which will enable the ATIP Office to more efficiently conduct privacy assessments in a more robust and holistic fashion while enhancing communication with other stakeholders and business lines. Work was also undertaken to enhance privacy breach reporting tools to better assess and track privacy breaches and the development of an online training module for privacy breaches is being completed. The ATIP Office has seen a steadily increasing demand for, and involvement in, Bank-wide initiatives and is continuing to expand its Privacy Risk Management Framework to assist with this.

The ATIP Office also collaborated with Corporate Security and IT Services to incorporate the reporting procedures surrounding Lost & Stolen devices onto a new service platform. This initiative was leveraged to replace the existing processes and streamline the reporting procedure to improve accountability.

During this reporting period, the ATIP Office also completed 4 Privacy Impact Assessments which reflects a doubling of the output from previous years.

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 tri-weekly meetings to closely track all active files including maintaining a log of active requests. Recent initiatives have included the introduction of a "scrum" board to regular meetings to track ongoing requests and projects according to Agile principles. This helps the team to carefully monitor timelines, milestones, and next steps and fosters consistent collaboration. More importantly, staff discuss solutions as challenges arise and determine any process changes required to improve performance. The ATIP Office holds quarterly 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)

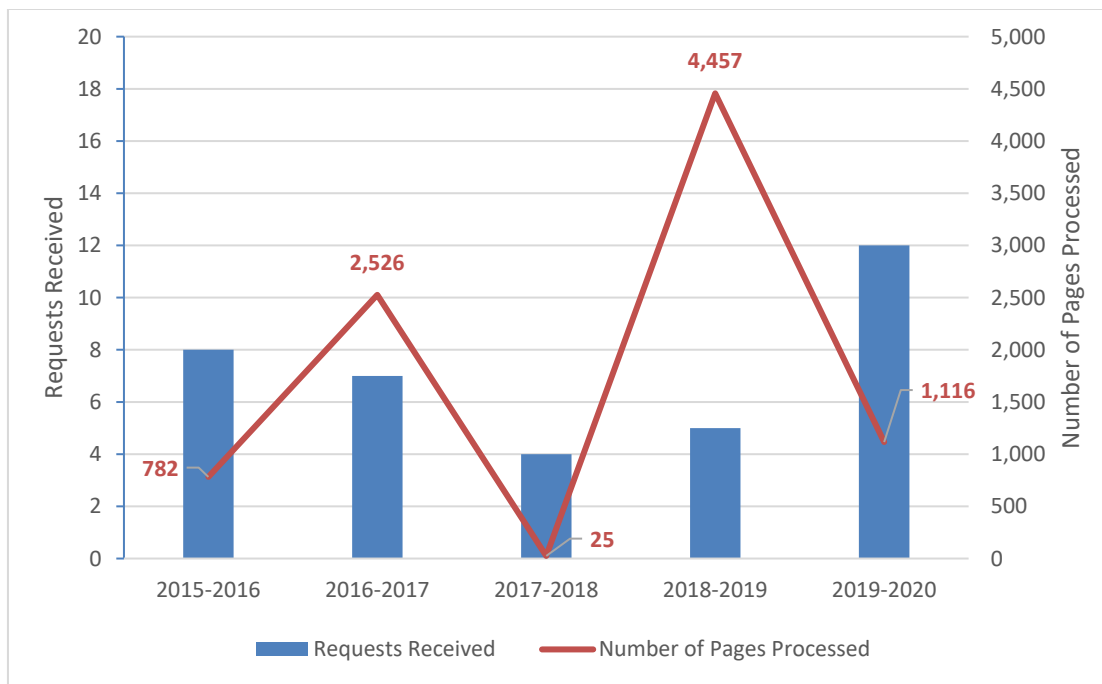
### Privacy Requests

This year, the Bank received 12 formal requests for access to personal information made pursuant to the *Privacy Act* compared to 5 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.

The table below does not reflect the 1660 pages reviewed and deemed Not Relevant which contributed to the heavy workload during this period. This is primarily attributable to a large number of duplicate pages retrieved as part of due diligence efforts and thorough record retrieval searching. In addition, there is one ongoing request not reflected in the table below but which requires the review of over 140,000 pages and contributed heavily to the workload of the ATIP Office during this reporting period.

**Table 1: Overview of PA Requests Received and Completed, 5-Year Trend**

Fiscal Year	Requests Received	Requests Outstanding from previous reporting period	Requests completed	Number of pages processed
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
2019-2020	12	1	10	1,116

**Chart 1: Number of PA Requests and Pages Processed, 5-Year Trend**

## Informal Requests

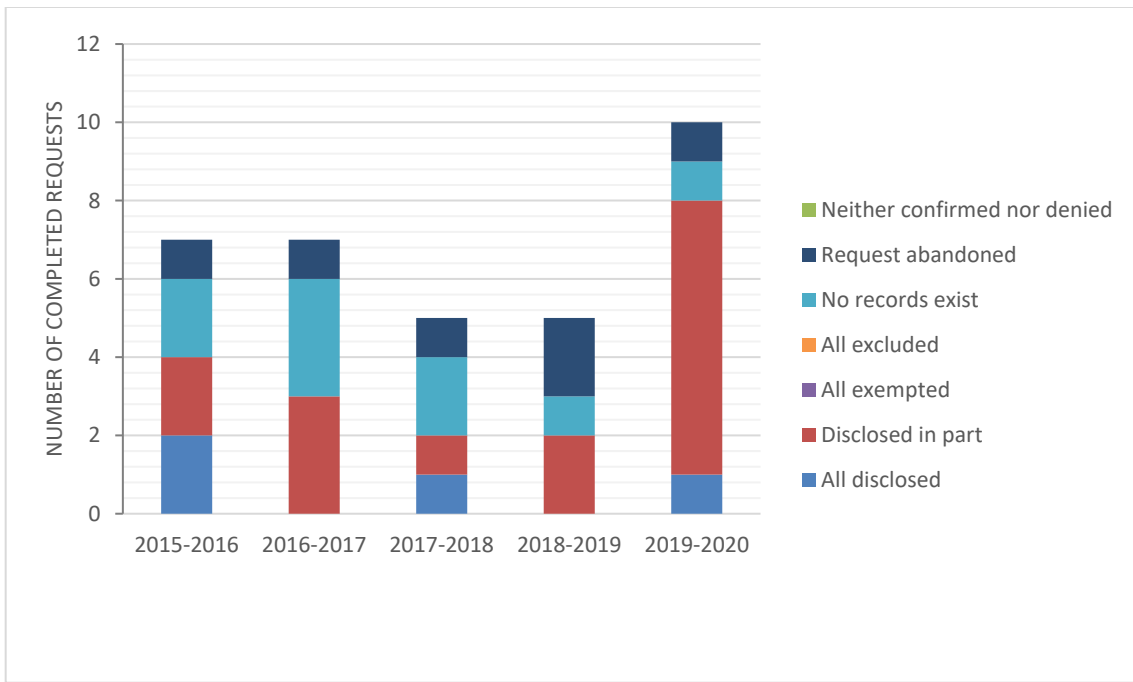
A request made under the Act is considered to be a formal request if it is presented to the Access to Information and Privacy Coordinator in writing, refers to the Act and contains sufficient information to identify the requested records. However, individuals may choose to proceed informally to gain 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 two informal privacy requests for which 43 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.

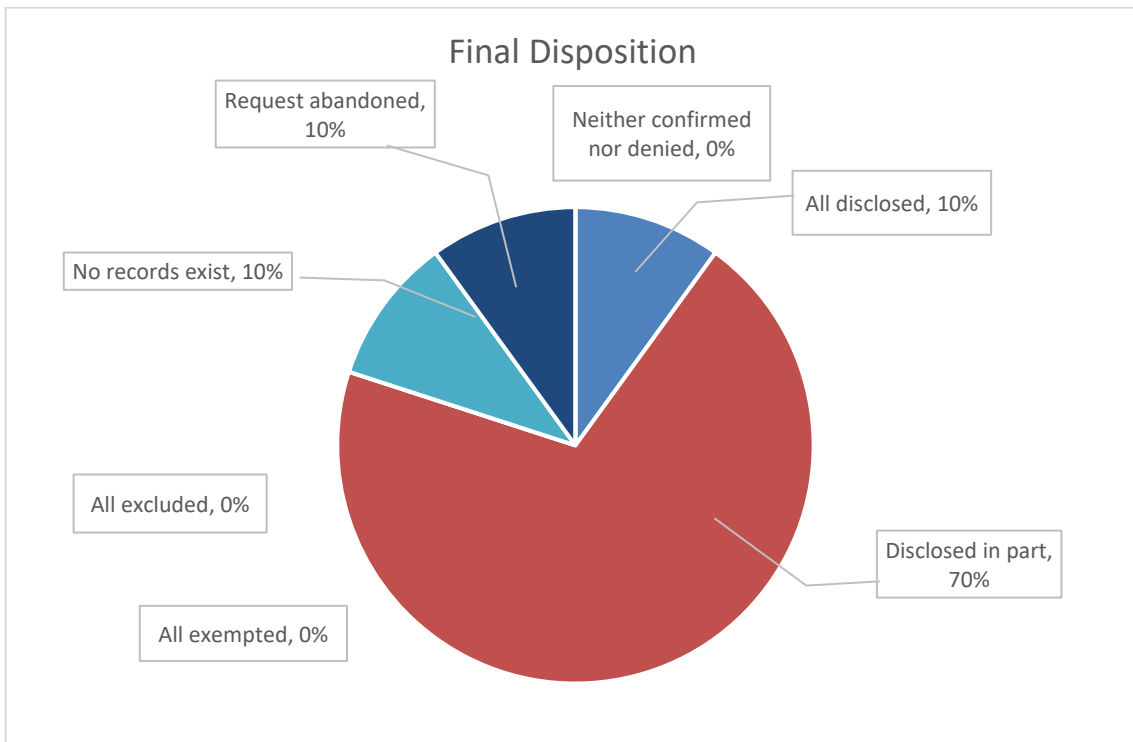
## Disposition of Requests

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

**Chart 2: Disposition for Completed Requests, 5-Year Trend**



**Chart 3: Disposition for Completed Requests, Current Reporting Period**

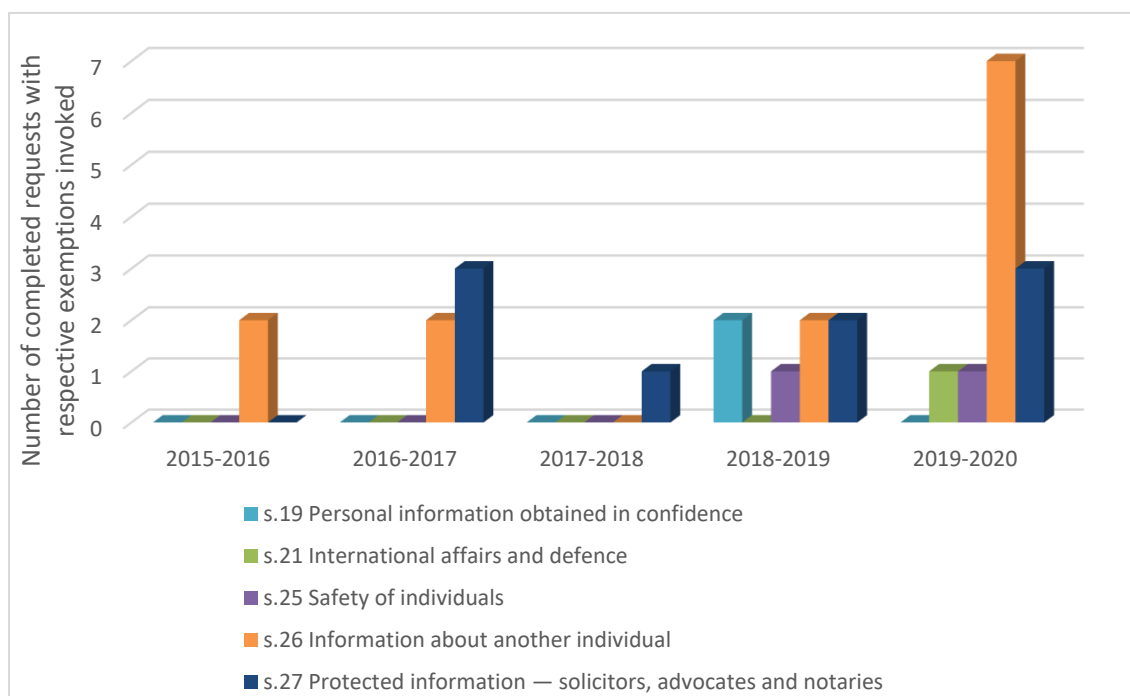




## Exemptions Invoked

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). Other exemptions, namely section 25 (safety of the individual) and section 21 (international affairs and defence) were invoked and reflect an increasing complexity of privacy requests received.

**Chart 4: Most Frequently Invoked Exemptions, 5-Year Trend**



## Extensions

Five of the requests closed by the Bank of Canada in 2019-2020 were either complex in nature, involved a large volume of records or required consultations. As a result, the Bank claimed extensions under 15(1)(a)(i) and 15(1)(a)(ii).

## Completion Time

Of the 10 requests completed during this reporting period, all but two (2) were closed within the statutory deadline. Two files were affected by delays relating to external consultations and workload.

## Complaints and Investigations

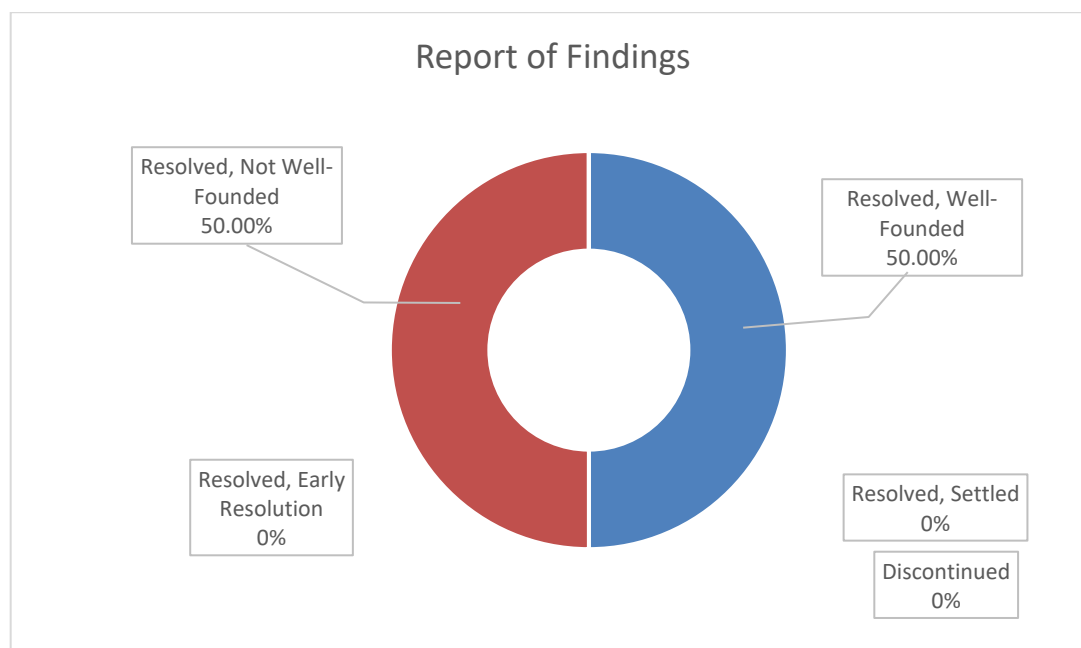
During this reporting period, the Bank of Canada received 4 complaints from the Office of Privacy Commissioner of Canada (OPC), compared to 0 in the previous reporting period. There was 1 privacy complaint carried over from the previous reporting period which is still outstanding. Two of these complaints were resolved as well-founded and not well-founded, respectively. One on-

going complaint involves a request containing more than 140,000 pages which has contributed to a significant workload for the ATIP Office.

**Table 2: Complaints received, carried over and resolved, 5-year Trend**

Reporting period	Number of complaints received	Number of complaints carried over from previous reporting period	Complaints resolved	Number of Complaints Outstanding
2015-2016	0	0	0	0
2016-2017	1	0	1	0
2017-2018	1	1	1	1
2018-2019	0	1	0	1
2019-2020	4	1	2	3

**Chart 5: Report of Findings, 2019-2020**



### 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, the Bank had no material privacy breaches to report.

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 four Privacy Impact Assessments (PIA) on major Bank initiatives involving the implementation of cloud-based technology, Bank-wide software and platform updates, and security and access control procedures. 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. Twenty-four (24) initiatives (35 in previous year) 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, and the acquisition of data sets. In addition, 19 procurement initiatives were assessed through the Bank's Third-Party Risk Management process to assess and mitigate privacy risks associated with service arrangement with vendors. The increasing 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 more than doubled the volume from the previous year and doubled the number of requests closed compared to the previous reporting period. Some of these new requests involved a large volume of records and, combined with access to information requests carried over from the previous reporting period, accounted for a heavy workload for the ATIP Office. In particular, a number of privacy requests were considered complex in nature as they involved a very large number of records (one ongoing request involves more than 140,000 pages) and required external consultations as well as legal advice. 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*.

Over this reporting period, the ATIP Office has seen a significant expansion in the nature, scope and complexity of the advice it provides. The pace of technological change continues to accelerate and the cycles for the implementation of new technology are getting shorter. As the Bank moves further along its digital transformation, adopts new tools and technology, and works with more complex datasets, the Bank is mindful that these transformations must be assessed through the lens of privacy. To that end, the ATIP Office collaborates closely with business lines across the Bank on initiatives that involve personally identifiable information in order to identify privacy risks and find solutions to mitigate the risks, to ensure that the Bank is compliant with its obligations under 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 36 Parliamentary Questions in this reporting year compared to 40 in the previous reporting period, 21 of which were received over the December holiday 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.

In addition to a heavy workload, the ATIP Office experienced a significant resource shortage. Both Senior Analyst positions, two Analyst positions and the ATIP Assistant position were all vacant at various times during this reporting period, reflecting over 14.5 months of vacancy or 1.2 person-years, which significantly affected the workload of the ATIP Office. Despite the constraints, the ATIP Office was able to complete twice as many privacy requests compared to the previous reporting period.

The end of this reporting period also coincided with substantial changes to the operational environment due to the challenges and restrictions resulting from the Covid-19 pandemic. The ATIP Office staff, like all Bank employees, quickly transitioned to permanent teleworking arrangements in early March 2020. As a result of the Bank's infrastructure, information technology maturity and Continuity of Operations readiness, delays and challenges in adapting to full teleworking were largely mitigated.

Given the critical role of the Bank's mandate in responding to the unprecedented economic and financial system challenges resulting from the Covid-19 pandemic, some operational elements were impacted by the availability of departmental staff. Delays were encountered in processing ATIP requests due to the prioritization of the Bank's core analytical and reporting work during this period. The events of the COVID pandemic and the shift to mandatory telework arrangements, have also given rise for the need to quickly identify privacy concerns in association with collaboration tools or features, and processes not previously implemented at the Bank. During this period, the ATIP Office has reminded staff working of the importance of managing and safeguarding personal information in accordance with the principles set out in the *Privacy Act*.

Appendix A



ATTACHMENT A

3 June 2013

To/A Jeremy Farr  
General Counsel & Corporate Secretary  
  
Marie Bordeleau  
Deputy Corporate Secretary/ATIP Coordinator

From/De Stephen S. Poloz  
Governor

**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***

<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 2019 to 31 March 2020)



**Statistical Report on the Privacy Act**

Name of institution: Bank of Canada

Reporting period: 2019-04-01 to 2020-03-31

**Section 1: Requests Under the Privacy Act**

**1.1 Number of requests**

	Number of Requests
Received during reporting period	12
Outstanding from previous reporting period	1
<b>Total</b>	<b>13</b>
Closed during reporting period	10
Carried over to next reporting period	3

**Section 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	1	0	0	0	0	1
Disclosed in part	1	3	1	2	0	0	0	7
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	1	0	0	0	0	0	0	1
Request abandoned	0	0	1	0	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</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	1
19(1)(e)	0	22(2)	0	26	7
19(1)(f)	0	22.1	0	27	3
20	0	22.2	0	27.1	0
21	1	22.3	0	28	0
		22.4	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

Paper	Electronic	Other
7	1	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
1116	881	9

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	1	144	0	0	0	0	0	0
Disclosed in part	6	156	0	0	1	581	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	0	0	1	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>6</b>	<b>156</b>	<b>2</b>	<b>144</b>	<b>1</b>	<b>581</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	1	2	0	0	3
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	1	0	0	1
Neither confirmed nor denied	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>4</b>

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	8
Percentage of requests closed within legislated timelines (%)	80

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
2	1	1	0	0

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

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	0	1	1
16 to 30 days	0	1	1
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	2	2

2.8 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

**Section 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

**Section 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

**Section 5: Extensions**

5.1 Reasons for extensions and disposition of requests

Number of requests where an extension was taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
4	1	0	1	1	0	1	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	1	0	1	1	0	1	0	0
31 days or greater								0
<b>Total</b>	1	0	1	1	0	1	0	0

**Section 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
<b>Total</b>	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over to the next 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	of Requests	Pages Disclosed	of Requests	Disclosed	of Requests	Pages Disclosed	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

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

Section 31	Section 33	Section 35	Court action	Total
4	5	2	0	11

**Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)**

9.1 Privacy Impact Assessments

Number of PIA(s) completed	4
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	43	0	0	1

**Section 10: Material Privacy Breaches**

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

**Section 11: Resources Related to the Privacy Act**

**11.1 Costs**

Expenditures		Amount
Salaries		\$345,785
Overtime		\$0
Goods and Services		\$77,764
• Professional services contracts	\$71,954	
• Other	\$5,810	
<b>Total</b>		<b>\$423,549</b>

**11.2 Human Resources**

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	2.32
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.04
Students	0.00
<b>Total</b>	<b>2.36</b>

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

## Appendix C

Bank of Canada

### 2019-2020 Supplemental Statistical Report – Requests affected by COVID-19 measures

In addition to completing the forms for the Statistical Reports on the ATIA and Privacy Act for 2019-20, institutions are asked to complete this Supplemental Report to help identify the impact of COVID-19 measures on institutional performance for 2019-20 and going forward. The data requirements are set out in the tables below.

#### Supplemental Statistical Report on the *Access to Information Act*

The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

**Table 1 – Requests Received**

		Column (Col.) 1 Number of requests
Row 1	Received from 2019-04-01 to 2020-03-13	32
Row 2	Received from 2020-03-14 to 2020-03-31	1
Row 3	<b>Total<sup>1</sup></b>	33

<sup>1</sup> – Total for Row 3 should equal the total in the ATI Statistical Report section 1.1 Row 1

The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

**Table 2 – Requests Closed**

		Col. 1 Number of requests closed within the legislated timelines	Col. 2 Number of requests closed past the legislated timelines
Row 1	Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting periods	21	12
Row 2	Received from 2020-03-14 to 2020-03-31	0	0
Row 3	<b>Total<sup>2</sup></b>	21	12

<sup>2</sup> – Total for Row 3 Col. 1 should equal the total in the ATI Statistical Report section 3.6.1

Row 1 -- Total for Row 3 Col. 2 should equal the total in the ATI Statistical Report section 3.7.1, Col. 1 Row 1



**Bank of Canada**

The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

**Table 3 – Requests Carried Over**

		Col. 1
		Number of requests
Row 1	Requests received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	9
Row 2	Requests received from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	1
Row 3	<b>Total<sup>3</sup></b>	<b>10</b>

<sup>3</sup> – Total for Row 3 should equal the total in the ATI Statistical Report section 1.1 Row 5

**Supplemental Statistical Report on the Privacy Act**

The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

**Table 4 – Requests Received**

		Column (Col.) 1
		Number of requests
Row 1	Received from 2019-04-01 to 2020-03-13	12
Row 2	Received from 2020-03-14 to 2020-03-31	0
Row 3	<b>Total<sup>1</sup></b>	<b>12</b>

<sup>1</sup> – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 1

The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

**Table 5 – Requests Closed**

		Col. 1	Col. 2
		Number of requests closed within the legislated timelines	Number of requests closed past the legislated timelines
Row 1	Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting periods	8	2
Row 2	Received from 2020-03-14 to 2020-03-31	0	0
Row 3	<b>Total<sup>2</sup></b>	8	2

<sup>2</sup> – Total for Row 3 Col. 1 should equal the total in the Privacy Statistical Report Section 2.6.1 Row 1 -- Total for Row 3 Col. 2 should equal the total in the Privacy Statistical Report Section 2.7.1. Col. 1 Row 1

The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

**Table 6– Requests Carried Over**

		Col. 1
		Number of requests
Row 1	Requests from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	3
Row 2	Requests from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	0
Row 3	<b>Total<sup>3</sup></b>	3

<sup>3</sup> – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 5