

Annual Report on the administration of the *Privacy Act*

(1 April 2020 to 31 March 2021)



August 2021

Contents

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
Administration of the <i>Privacy Act</i>	3
Delegation of Authority	3
Organizational Structure to Fulfill <i>Privacy Act</i> Responsibilities	4
Information Holdings	4
Training and Awareness	5
Institution-specific privacy related policies, guidelines and procedures	5
Key Issues and Actions Taken on Complaints or Audits	6
Monitoring Compliance	6
Interpretation of the Statistical Report (Appendix B)	7
Privacy Requests	7
Consultations	7
Informal Requests	7
Disposition of Requests	8
Exemptions Invoked	8
Extensions	9
Completion Time	9
Complaints and Investigations	9
Disclosures under Paragraph 8(2)(m)	10
Material privacy breaches	10
Assessment of privacy issues	10
Operational Environment	12
Covid-19 Impacts	12
Appendix A	14
Appendix B	16
Appendix C	26

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 Bank influences the supply of money circulating in the economy, using its monetary policy framework to keep inflation low and stable.

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.

Funds Management

The Bank is the "fiscal agent" for the Government of Canada, managing its public debt programs 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 strategic plan (SP) to set out its strategic direction, goals and indicators of success.

Administration of the *Privacy Act*

Delegation of Authority

Executive and Legal Services (ELS) is responsible for fulfilling the Bank’s compliance obligations under the *Access to Information Act*, the *Privacy Act*, the *Public Servants Disclosure Protection Act*, and other policies and procedures required by the Federal government, as well as responding to Parliamentary inquiries. The ATIP Office, under ELS, supports business areas in the identification and consideration of Access to Information and privacy concerns arising through new mandates and new areas of business and technology. The ATIP Office mitigates increasing privacy risks and enhances Bank staff awareness and understanding of privacy concerns through improved training, tools and procedures.

Under Section 71(2) of the *Privacy 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, and its Deputy Corporate Secretary and Access to Information and Privacy Coordinator. Responsibility for various administrative requirements of the legislation, such as extending time limits and transferring requests, has been delegated to the ATIP Director. The signing of the Statement of Completeness of responses to written Parliamentary Questions has also been delegated to the General Counsel/Corporate Secretary and to the Deputy Corporate Secretary.

In his absence, the General Counsel/Corporate Secretary has delegated his authority to receive and act on disclosures of wrongdoing according to the Disclosure of Wrongdoing Policy and Procedures to the Deputy Corporate Secretary.

The Directors of the Bank of Canada, under Section 9 of the Bank of Canada Act, appointed Tiff Macklem as the (10th) Governor of the Bank of Canada for a seven-year term, effective June 3, 2020.

A copy of the Bank's updated Delegation Order is attached (see 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. Under the management of the Access to Information and Privacy Coordinator, 1 Director, 3 ATIP Specialists, 4 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.

The Bank of Canada does not currently provide any services related to privacy to any other institution per section 73.1 of the *Privacy Act*.

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. Per a request from Treasury Board Secretariat, work was initiated on updating Personal Information Banks containing Social Insurance Numbers, alongside routine work commenced on updating several existing Personal Information Banks.

Training and Awareness

During this reporting period, the ATIP Office delivered 15 awareness sessions (in both official languages) to 46 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 as well as targeted sessions for employees working with datasets for research purposes. 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, guidance for departmental contacts and best practices for record search and retrieval 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 advice and guidance through all of its risk assessment tools, including privacy checklists, Third Party Risk Management and Privacy Advice templates, as well as an increased demand for training and refresher sessions specifically for employees involved in the onboarding of sensitive datasets. An awareness session focused on Privacy Risk Management Tools including Privacy Checklists and Privacy Impact Assessments was delivered to the Bank's Human Resources Leadership team.

The ATIP Office continued its work on modernizing and enhancing its approach for delivering ATIP awareness through the development of additional online learning modules. 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. A second module concerning privacy breaches was completed and integrated into the Bank's annual compliance training exercise, the completion of which was mandatory for all employees. Within the reporting period, 647 employees completed the ATIP Awareness module and 2013 employees completed the Privacy Breach module. A third module relating to Privacy Behaviours is currently in development and will be included in the 2021 Compliance Exercise.

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 dedicated significant time and effort to develop and update guidelines, policies and procedures for mitigating privacy risks, especially in light of the Covid-19 pandemic and given the rapid advance in technology which presents new and unique risks to personal information.

In order to support the Bank in meeting its mandate and strategic objectives and in response to increasing demand, the ATIP Office has increased its involvement in the roll-out of new privacy assessment tools, collaboration tools and data governance processes, developed guidance and procedures for audio/video recording and conducting surveys, increased participation into a number of Bank governance committees including Risk Management, Technology Implementation and Contract Management, and continued its extensive participation in the Bank's Third Party Risk Management (TPRM) Framework (see **Assessment of Privacy Issues**).

As part of the Bank's 'Data First' strategy, the ATIP Office, in collaboration with in-house Information Technology specialists, is developing a prototype of an interactive inventory of the Bank's personal information. Work is expected to continue throughout the next reporting period to operationalize the inventory to assist with privacy risk assessment activities.

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.

Key Issues and Actions Taken on Complaints or Audits

The Bank only received one complaint during this reporting period which alleged a failure to respond within the time frame set out by the Act and was resolved as well-founded and closed. The deadline was missed as the result of an administrative delay which has been addressed internally through renewed emphasis on existing best practices.

One other complaint was resolved during this reporting period which alleged a failure to respond within the time frame set out by the Act for a request involving the review of roughly 160,000 pages. A response date was successfully negotiated with the Office of the Privacy Commissioner and the complaint was considered conditionally resolved. The ATIP Office provided a final response to the requester well in advance of the negotiated deadline. Given these exceptional circumstances, no further operational or administrative action by the ATIP Office was determined necessary.

Having provided formal representations in February 2020, the Bank awaits further action from the OPC on one outstanding complaint. No audits or investigations of the ATIP Office were completed during this period.

Monitoring Compliance

The ATIP staff regularly monitors all ATIP requests by holding bi-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 9 formal requests for access to personal information made pursuant to the *Privacy Act* compared to 12 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 155,633 pages reviewed and deemed Not Relevant which contributed to the heavy workload during this period. This is almost entirely attributable to one request that required a search through an enterprise-wide repository which resulted in a large number of duplicate pages retrieved as part of due diligence efforts. This request 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
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
2020-2021	9	4*	12	7,795

*Requests restated to correct an administrative error in previous reporting.

Consultations

No consultations under the Privacy Act were received by the Bank during this reporting period.

Informal Requests

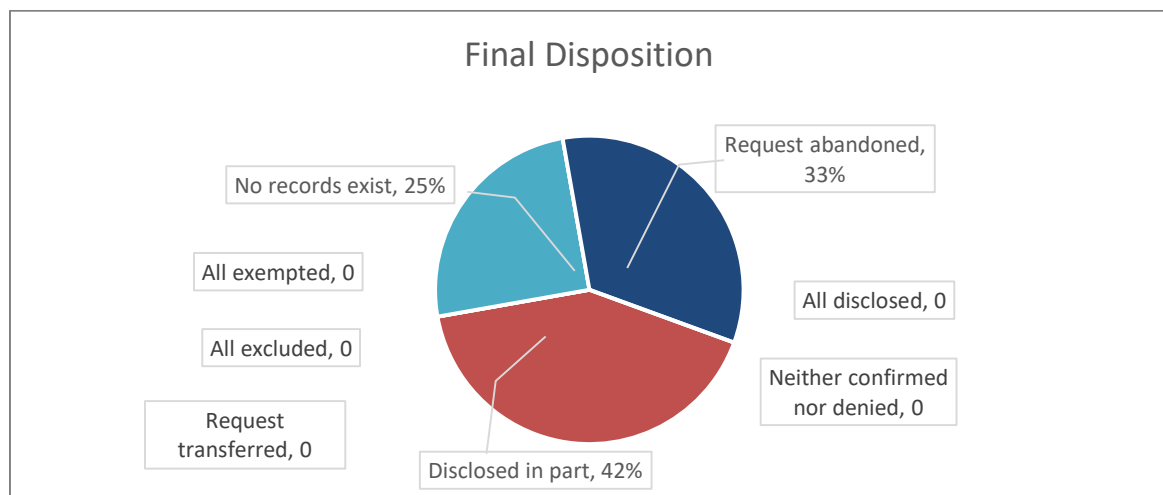
A request made under the Act is considered to be a formal request if it is presented to the Access to Information and Privacy Coordinator in writing, refers to the Act and contains sufficient information to identify the requested records. However, individuals may choose to proceed informally to gain 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 8 informal privacy requests for which 1504 pages were processed and disclosed, compared to two requests and 43 pages processed and disclosed from the previous reporting period respectively. 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 shows the disposition for completed requests during this reporting period.

Chart 1: 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).

Chart 2: Most Frequently Invoked Exemptions, 5-Year Trend



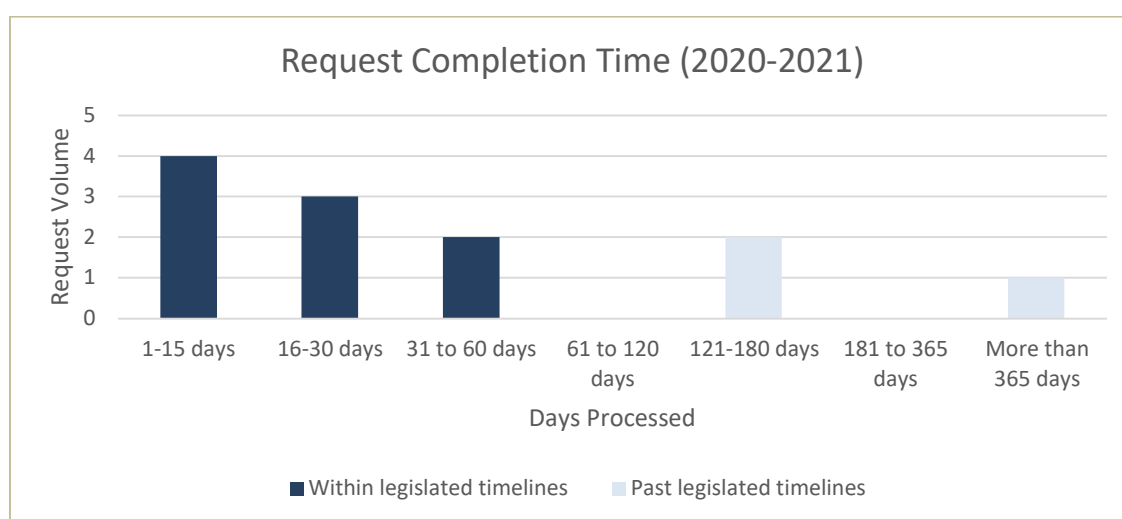
Extensions

Four of the 12 requests closed by the Bank of Canada in 2020-2021 were either complex in nature, involved a large volume of records or interfered with operations due to a large number of requests. As a result, the Bank claimed extensions for these requests under section 15(1)(a)(i).

Completion Time

Of the 12 requests completed during this reporting period, all but 3 were closed within the statutory deadline (75% completion within legislated timelines). Two files were affected by delays relating to large volumes and workload, and one request was impacted by an administrative delay.

Chart 3: Request Completion Time, 2020-2021



Complaints and Investigations

During this reporting period, the Bank of Canada received 1 formal notice of complaint from the Office of Privacy Commissioner of Canada (OPC), compared to 4 in the previous reporting period. There were 2 privacy complaints carried over from the previous reporting period. Two (2) complaints were resolved as well-founded and one complaint remains outstanding pending further decision from the OPC (see **Key Issues and Actions on Complaints**).

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
2016-2017	1	0	1	0
2017-2018	1	1	1	1
2018-2019	0	1	0	1
2019-2020	4	1	2	3
2020-2021	1	2	2	1

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.

In addition, the ATIP Director is a member of the Bank's Cyber Incident Response Team (CIRT) whose mandate is to ensure collaboration with key stakeholders across the Bank and jointly propose recommendations for appropriate courses of action for remediation.

Assessment of privacy issues

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*.

During this reporting period, ATIP Office resource time was spent working on client activities involving the management of personal information, including the completion of two Privacy Impact Assessments (PIAs) on major Bank initiatives involving Relocation Services and Service-Now, and began work on a new PIA as well as an in-house PIA update. This reflects a continuing engagement with complex privacy issues each year. The Bank of Canada is excluded from the TBS Directive on Privacy Impact Assessments and is not required to post summaries of PIAs on its website, however summaries of completed 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. Fourteen (14) initiatives (24 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 data

loss prevention, enterprise analytics, IT and facilities modernization, to language training pilot projects. The number of initiatives evaluated was constrained by the significant resources shortage experienced by the ATIP office (see **Operational Environment**).

The ATIP Office continues to participate as a Risk Owner in the Bank's Third Party Risk Management Framework which describes key activities that the Bank undertakes to minimize and manage the impact of third party risks. During this period, a total of 43 arrangements were assessed through this process to determine if the arrangement meets or exceeds the Bank's pre-determined risk thresholds and whether additional scrutiny is required, including from a privacy perspective. Assessing vendors' Privacy Risk Management Framework in collaboration with other Risk Owners within the Bank results in an efficient and robust assessment of risk to the Bank and the personal information for which the Bank is responsible.

In addition, the ATIP Office continued to provide 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 sessions. During this reporting period the ATIP Office provided assessment or approval of 59 audio/video recording requests.

The ATIP Office dedicated significant effort during this reporting period to developing a more robust suite of privacy tools to accommodate the new and changing needs for privacy input on projects of varying sensitivity and scope including: the automation/digitization of the privacy checklist and triage tool, a Simplified PIA tool, a tool to track progress against PIA recommendations, as well as a standardized template to consistently document privacy advice. Work was also undertaken to enhance privacy breach reporting tools in order to better assess and track privacy breaches from internal and external activities or vendors. 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.

Operational Environment

Although the ATIP Office received slightly fewer privacy requests during this reporting period (9 down from 12), the ATIP Office was able to close 12 requests and one voluminous request was carried over to the next reporting period. Among the closed requests was a single request that required the review of roughly 160,000 pages and was the subject of a complaint. Compared to previous years, the volume of both pages processed and pages disclosed was significantly larger and constituted a 5-year peak. A number of these requests were considered complex in nature; involving either a large amount of records, interwoven information or legal advice. This, coupled with a substantial volume of records associated with *Access to Information Act* requests, consultations, and complaints accounted for a heavy workload for the ATIP Office.

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*.

As well as administering the Bank's ATIP program, the ATIP Office is also responsible for coordinating the Bank's responses to Parliamentary Returns. 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 workload from Parliamentary Returns increased significantly during this period with the Bank receiving 50 Parliamentary Questions as well as 3 Parliamentary Motions, 1 Senate Question and 1 Parliamentary Petition compared to 36 Questions in the previous reporting period. Since all Parliamentary returns 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. Several positions were vacant at various times during this reporting period including two Senior Analyst positions, one Analyst position and the ATIP Assistant position, resulting in over 20.5 months of vacancy (1.71 person years) which significantly affected the workload of the ATIP Office. The ATIP Office took measures to hire and train new staff, and this resource gap was closed in Q4 of the current reporting period. The need to onboard and train new staff throughout the year strongly contributed to delays in processing and completing requests, PQs, and other ATIP activities

Covid-19 Impacts

The beginning 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 mid-March 2020. As a result of the Bank's infrastructure, information technology maturity and Continuity of Operations readiness, technical delays and challenges in adapting to full teleworking were largely mitigated. As reflected in Appendix C of the Statistical Report, the ATIP Office was able to receive requests by both mail and email for the full 52 weeks of this reporting period. The ATIP Office also had full capacity to process Unclassified and

Protected B records in both paper and electronic formats over the 52 week reporting period, with partial capacity to process Secret and Top Secret records for the 52 week period.

Despite the operational and administrative challenges resulting from the pandemic, the Bank of Canada continued to receive a large volume of requests, consultations and Parliamentary Questions throughout the reporting period. Due to the Bank's key involvement in Canada's economic response to the pandemic, the Bank received significant media attention and Parliamentary scrutiny resulting in a particularly large increase in the number of Parliamentary returns directed to the Bank.

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 key 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 Monetary Policy and Financial System 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. This has put significant emphasis and pressure on the ATIP Office's ability to assess these requests and issues quickly and consistently (see **Assessment of Privacy Issues**).

New language was also added to ATIP Office correspondence letters for requesters which reflects the challenges of Covid-19 restrictions. Specifically, requesters are made aware that Bank staff have very limited access to physical records at Head Office which may impact request completion times and/or record retrieval.

A greater number of Workplace Environment Check-Up (WECU) surveys and Pulse Check questionnaires were conducted during this reporting period to monitor Bank employee wellness during Covid-19 lockdown and restriction periods. The ATIP Office was heavily engaged in reviewing responses to protect personal information and was impacted by this increased workload.

Appendix A



June 3, 2020

To: Jeremy Farr
General Counsel & Corporate Secretary

From: Tiff Macklem
Governor

Lesley Ryan
Deputy Corporate Secretary and Senior Director, Compliance
Access to Information and Privacy Coordinator

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

The Governor of the Bank of Canada, pursuant to section 73(1) of the *Privacy Act* and section 95(1) of the *Access to Information Act*, hereby designates the persons holding the positions set out on 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.

Schedule

Position	<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 and senior director, compliance/ Access to information and privacy coordinator	Full authority	Full authority
Director ATIP	15, and mandatory provisions of 26 for all records*	8(1), 9(1) and (2), 11(2), and the mandatory provisions of 19(1) for all records*


(Governor Tiff Macklem)

June 3, 2020.
(Date)

*refer to attached 'Table of Specific Delegation'

Table of Specific Delegation*Responsibility Delegated to Director ATIP — *Privacy Act*

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

*Responsibility Delegated to Director ATIP — *Access to Information Act*

Sections	Description	Position
8(1)	Transfer of request	Director ATIP
9(1) and (2)	Extensions of time limits	Director ATIP
11(2)	Fees	Director ATIP
19(1)	Personal information	Director ATIP

Reference***Extracts of the Privacy Act (R.S.C., 1985, c. P-21)*****Delegation by head of government institution**

73 (1) The head of a government institution may, by order, delegate any of their powers, duties or functions under this Act to one or more officers or employees of that institution.

Extracts of the Access to Information Act (R.S.C., 1985, c. A-1)**Delegation by head of government institution**

95 (1) The head of a government institution may, by order, delegate any of their powers, duties or functions under this Act to one or more officers or employees of that institution.

Appendix B

Statistical Report on *Privacy Act*

(1 April 2020 to 31 March 2021)



Statistical Report on the *Privacy Act*

Name of institution: Bank of Canada

Reporting period: 01/04/2020 to 31/03/2021

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	9
Outstanding from previous reporting period	4
Total	13
Closed during reporting period	12
Carried over to next reporting period	1

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	0	0	0	0	0	0
Disclosed in part	0	0	2	0	2	0	1	5
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	1	2	0	0	0	0	0	3
Request abandoned	3	1	0	0	0	0	0	4
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	4	3	2	0	2	0	1	12

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)	1	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	5
19(1)(f)	0	22.1	0	27	4
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
3	2	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
7795	7795	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	0	0	0	0	0	0	0	0
Disclosed in part	2	101	1	149	1	601	0	0	1	6944
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	4	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	6	101	1	149	1	601	0	0	1	6944

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	2	4
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	2	4

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	9
Percentage of requests closed within legislated timelines (%)	75

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
3	2	0	0	1

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

2.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	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
Total	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	2	1	1	0	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 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	2	1	1	0	0	0	0	0
31 days or greater								0
Total	2	1	1	0	0	0	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
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over to the next reporting period	0	0	0	0

Section 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

Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
1	1	2	0	4

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

9.1 Privacy Impact Assessments

Number of PIA(s) completed	2
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	43	0	0	0

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	\$425,008
Overtime	\$0
Goods and Services	\$77,766
• Professional services contracts	\$77,766
• Other	\$0
Total	\$502,774

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	3.100
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.220
Students	0.000
Total	3.320

Note: Enter values to three decimal places.

Appendix C



Government of Canada / Gouvernement du Canada

Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act*

Name of institution: Bank of Canada

Reporting period: 2020-04-01 to 2021-03-31

Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATIP requests through the different channels.

	Number of Weeks
Able to receive requests by mail	52
Able to receive requests by email	52
Able to receive requests through the digital request service	0

Section 2: Capacity to Process Records

2.1 Enter the number of weeks your institution was able to process paper records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Paper Records	0	0	52	52
Protected B Paper Records	0	0	52	52
Secret and Top Secret Paper Records	0	52	0	52

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Electronic Records	0	0	52	52
Protected B Electronic Records	0	0	52	52
Secret and Top Secret Electronic Records	0	52	0	52