

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

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(1 April 2021 to 31 March 2022)



August 2022

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## Introduction

### Purpose of the *Privacy Act*

As set out in Section 2 of the *Privacy Act*, the purpose of this Act is “to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information”. This report is prepared in accordance with Section 71(1)(e) of the Act and is tabled in Parliament in accordance with Section 72.

### The Bank of Canada’s mandate

The Bank of Canada is the nation’s central bank. Its mandate, as defined in the *Bank of Canada Act*, is “to promote the economic and financial welfare of Canada.” The Bank’s 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.

#### *Retail Payments Supervision*

Under the Retail Payment Activities Act, the Bank will be responsible for supervising payment service providers.

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.

### Wholly-owned subsidiaries or non-operational institutions

The Bank of Canada is not reporting on behalf of any wholly-owned subsidiaries or non-operational institutions.

## 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.

A copy of the Bank's 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 *Information about Programs and Information Holdings* (formerly *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 period, the Bank maintained 43 institution-specific Personal Information banks and modified one [1] bank.

## Training and Awareness

The ATIP office offers frequent voluntary and mandatory training and awareness sessions for Bank employees in addition to monthly Orientation sessions for all new employees and students. Across all types of training and awareness, the ATIP office delivered a total of 25 awareness sessions in both official languages to 174 participants from various units throughout the Bank during this period. Twelve [12] of these sessions focused on general Access to Information and Privacy awareness, including internal procedural administration, the application of specific exemptions, guidance for departmental contacts and best practices for record search and retrieval during the processing of ATIA requests while another two [2] custom tailored awareness sessions were offered to departments upon specific request.

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. Thirteen [13] sessions were delivered with a specific focus on business processes involving the management of personal information, including privacy breach awareness training, privacy framework awareness, privacy risk management tools and workshops; the majority of these sessions [9] involved training for data onboarding which is now mandatory for employees engaging with sensitive datasets.

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. In previous years, two modules for general ATIP awareness and Privacy Breaches were integrated into the Bank's employee orientation program and are available to all staff through the Bank's Performance and Development program. A third module concerning Privacy Behaviours was completed this year and was integrated into the Bank's annual 2021 compliance training exercise, the completion of which was mandatory for all employees. Within the reporting period, 700 employees completed the ATIP Awareness module, 418 employees completed the Privacy Breach module, and 1957 employees completed the Privacy Behaviours module.

The ATIP Office briefs Senior Management and the Board of Directors periodically 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 prioritized the development and updating of guidelines, policies and procedures for mitigating privacy risks, especially in the context of the Bank's new ways of working (hybrid model) 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**).

The ATIP Office played an integral part in the development and implementation of the Bank's mandatory vaccination policy, in line with that of the federal government, with a focus on ensuring the policy and procedures were in compliance with the requirements of the Privacy Act and other relevant policies. In addition, great care was taken to ensure that employees received accurate and timely communications about the management of their personal information in association with the policy.

In collaboration with the Bank's Information and Knowledge Management Services, the ATIP Office is providing advice on the development of a directive on the use of audio/video recording technology to ensure that privacy considerations such as providing notice and obtaining consent, as applicable, are factored into decisions to record events.

As part of the Bank's 'Data First' strategy, the ATIP Office, in collaboration with in-house Information Technology specialists, continues to evolve a prototype of an interactive inventory of the Bank's personal information. Analysis is on-going to determine if there are synergies in this existing risk management reporting repository which may be leveraged to develop the personal information inventory. 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. The ATIP Office contributed to the assessment of additional compliance questionnaire elements under development for the implementation of the new Retail Payments Supervision regime and continues to support the Bank's compliance wherever required with the *Accessible Canada Act*.

The Bank of Canada did not receive any authority for a new collection or consistent use of Social Insurance numbers during this reporting period.

## Monitoring Compliance

The ATIP staff regularly monitors all ATIP requests by holding weekly meetings to closely track all active files including maintaining a log of active requests. Recent initiatives have included the refinement and expansion of the office's "scrum" board to track ongoing requests and all other projects and initiatives according to Agile principles. This helps the team to carefully monitor timelines, milestones, 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 regular 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 6 formal requests for access to personal information made pursuant to the *Privacy Act* compared to 9 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. One [1] request was carried over from the previous period and all seven [7] formal requests were completed in this period. No requests were processed that contained audio or visual records and zero minutes of audio and visual records were processed.

**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
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
2021-2022	6	1	7	1,735

### 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.

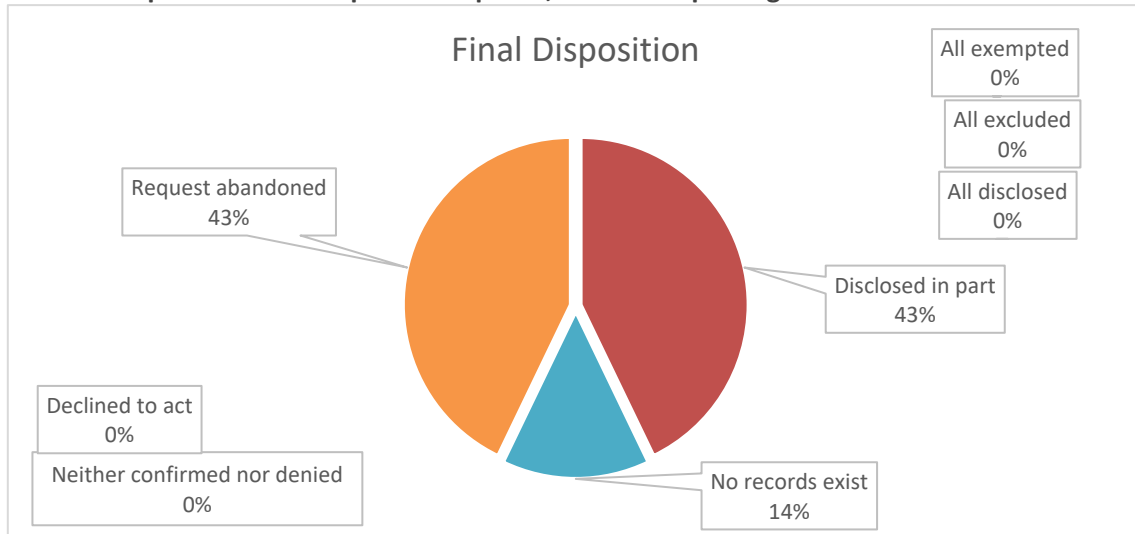
In addition, individuals may also choose to submit an informal request for access to personal information directly to the Bank's ATIP Office. In this reporting period, the ATIP Office responded to one [1] informal privacy requests for which 4,958 pages were processed and disclosed with 50,000 pages reviewed and deemed not relevant, compared to eight [8] requests and 1,504 pages processed and disclosed from the previous reporting period respectively.



## Disposition of Requests

The following chart shows the disposition for completed requests during this reporting period.

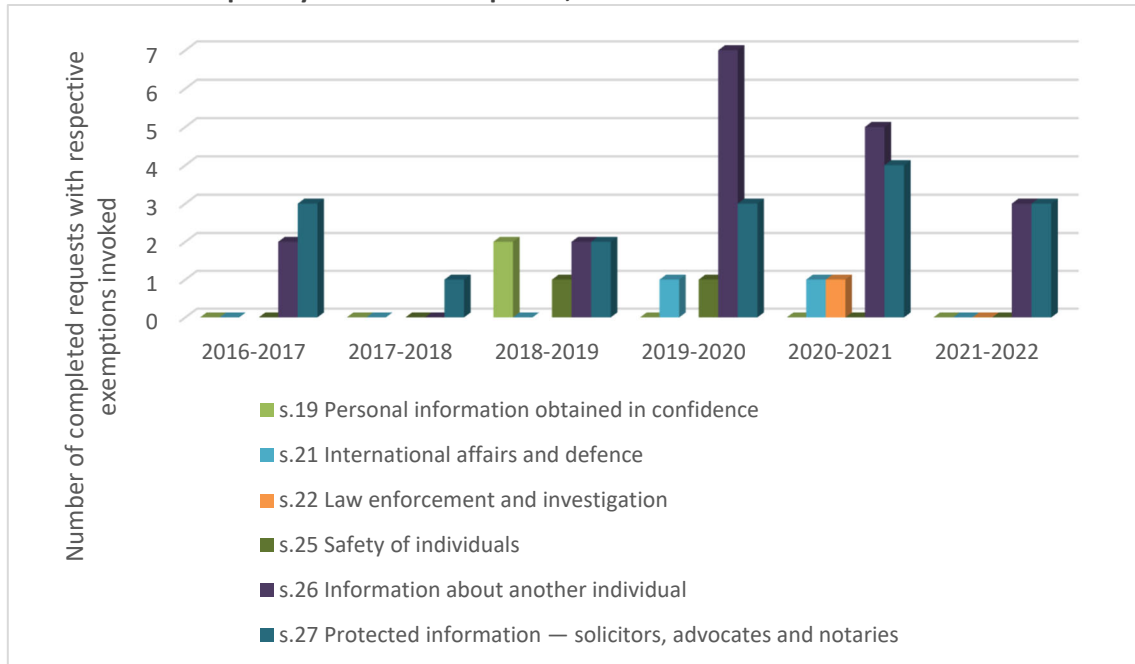
**Chart 1: Disposition for Completed Requests, Current Reporting Period**



## 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**



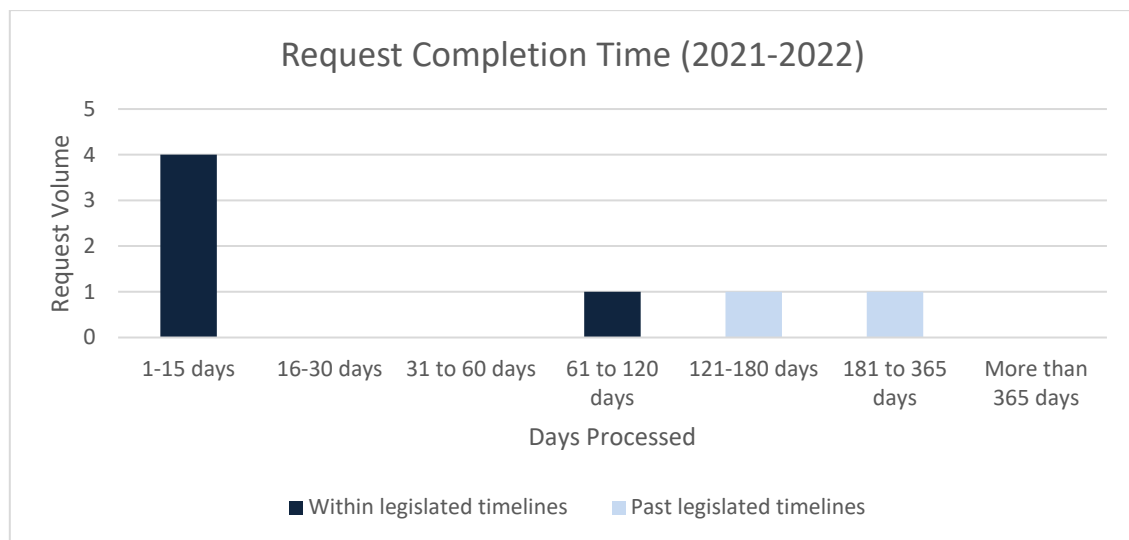
## Extensions

Three [3] of the seven [7] requests closed by the Bank of Canada in 2021-2022 were extended due to inference with operations where documents were difficult to obtain, represented a large volume of pages and required further review of exemptions. As a result, the Bank claimed extensions for these requests under section 15(1)(a)(i). No extensions were taken for the remaining four [4] requests.

## Completion Time

Of the seven [7] requests completed during this reporting period, all but 2 were closed within the statutory deadline (72% completion within legislated timelines). These two files were impacted by interference with operations and heavy workload. Zero [0] requests are outstanding from previous reporting periods.

**Chart 3: Request Completion Time, 2021-2022**



## Key Issues and Actions Taken on Complaints or Audits

The Bank only received one [1] complaint during this reporting period which alleged the misapplication of exemptions (right of access). The Bank provided background documentation to the Office of the Privacy Commissioner and the complaint was subsequently “discontinued”.

Having provided formal representations in 2020, the Bank awaits further action from the OPC on two [2] outstanding complaints. No audits or investigations of the ATIP Office were completed during this period.

The tables below show the number of complaints received, completed and carried over from previous periods.

**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
2017-2018	1	1	1	1
2018-2019	0	1	0	1
2019-2020	4	1	3*	2*
2020-2021	2**	2	2	2
2021-2022	1	2	1	2

\*Result is restated for One [1] complaint resolved in 2019-2020 that was erroneously reported as outstanding at the end of year.

\*\*Result is restated for One [1] complaint that was previously omitted as no formal notice of complaint was received at that time. To reflect the work undertaken in 2020-2021 to provide an “early resolution”, this is now being reported as an outstanding complaint.

**Table 3: Active complaints carried over, broken down by reporting period**

Fiscal year complaints were received	Number of Open Complaints
2021-2022	0
2020-2021	1
2019-2020	1
2018-2019	0
2017-2018	0
<b>Total</b>	<b>2</b>

## 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. No significant risks were introduced by any breaches during this period and the majority of incidents continue to stem from simple human error. Work has begun on expanding the breach reporting process with the intention of incorporating enhanced procedures for the investigation, and reporting of third-party breaches.

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. The Bank's Privacy Risk Management Framework continues to evolve through the creation of new assessment tools and streamlined processes in response to these growing demands.

During this reporting period, ATIP Office resource time was spent working on client activities involving the management of personal information, including the completion of one [1] Privacy Impact Assessment (PIA) on a major Bank initiative for the ServiceNow digital workflow application. Though the Bank is not subject to the TBS Directive on Privacy Impact Assessments and is not required to post summaries of PIAs on its website, 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 a robust questionnaire referred to as a privacy checklist. Thirty-nine (39) initiatives (14 in previous period) were reviewed via privacy checklist 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, and awards programs, system migrations, to IT and facilities modernization.

Approximately 14 instances of formal privacy analysis in the form of less exhaustive Privacy "Advice" Templates, not tracked in previous periods, were provided to business lines within this reporting period. While less formal than a checklist, each template nonetheless receives Director approval prior to being issued to project owners. The standardized template ensures that advice is rendered in a consistent format to all stakeholders.

Remote and flexible working arrangements have spurred on the introduction and use of technology for collaboration and communication purposes. In particular, video and audio recording of presentations and information sessions are becoming more common place. While convenient ways of communicating information, audio and video records also introduce privacy

risks with respect to the collection and use of personal information such as images, voices and recorded commentary and the management of the information. Access to audio/video recording technology by Bank staff is contingent on the advice provided by the ATIP Office on a case base case basis. During this reporting period the ATIP Office provided assessment or approval for 62 requests compared to 59 in the previous period. A framework and guidelines are being developed to streamline this process and eliminate the need for review of all recording requests; unique requests may still require ATIP/Compliance review in future.

As the creation and use of data becomes more important for carrying out business activities, considerable resource time has shifted to the assessment of privacy risks associated with the acquisition or creation of new data sets, and the use of existing data across the organization. ATIP Office expanded its collaboration role with data management stakeholder groups to ensure that data is appropriately assessed for privacy risks when onboarded. A robust data onboarding privacy checklist was introduced to consider any potential risks associated with the acquisition and proposed use of the data, and to establish controls to mitigate risks. Six [6] detailed data onboarding checklists were completed in this reporting period. In addition, the migration of data from one storage location to another can pose risks to data that is personally identifiable. To that end, five [5] migration initiatives were assessed using a dedicated data migration checklist to identify risks and ensure mitigation controls were in place prior to the migration of data.

The Bank frequently seeks feedback from its employees through surveys on a variety of topics. The ATIP Office plays an important role in ensuring that survey content and reporting formats respect privacy principles. The office participated in the development of a survey “playbook” which is intended to enable departments to clearly gauge the privacy risk thresholds involved in collecting specific information (e.g. demographics, open-text fields). Further to the guidelines set out in the “playbook”, a survey checklist was introduced to address privacy considerations in the development phase of a survey questionnaire; 3 survey checklists were completed in this reporting period. Finally, the office provided advice on ten [10] surveys conducted. The largest of these surveys was a Bank-wide Pulse Check which involved the review of roughly 1437 commentary responses to identify and protect any personal information contained in the comments prior their distribution to Bank leaders.

As a member of the Bank’s Cyber Incident Response Team (CIRT), the ATIP Office plays a critical role in the investigation of suspected or confirmed privacy breaches. The privacy chapter of the Cyber Incident Response Plan (CIRP) is updated regularly to ensure privacy best practices are incorporated. In addition to incidents which are investigated through CIRT, non cyber related suspected or confirmed breaches are handled through the ATIP Office directly. Breach reporting tools have been enhanced and streamlined to ensure the thorough and efficient reporting of incidents, including the rapid containment of situations, appropriate and timely notifications, and remedial actions post event.

The ATIP Office continues to participate as a Risk Owner in the Bank’s Third-Party Risk Management Program (TPRM), in collaboration with other Risk Owner functions across the Bank. Through a series of graduated assessment tools, the privacy practices of vendors that are under consideration to deliver services to the Bank which involve the collection, use, retention, disclosure and disposition of personally identifiable information, are rigorously assessed to ensure that these practices meet or exceed the Bank’s pre-determined risk thresholds with respect to the appropriate management of personal information. During this

period, the ATIP office participated in the completion of 32 Due Diligence Questionnaires and 95 Criticality & Exposure Filter assessments across a wide variety of vendors and third-party initiatives.

Strategically, the ATIP Office leverages its participation on more than 15 internal governance committees to provide timely feedback on privacy issues and anticipate future organizational needs with respect to privacy risk management. Included in this is the privacy analyses for major Bank of Canada initiatives such as the Retail Payment Supervision mandate, the modernization of the Unclaimed Properties Service, as well as exploratory research into privacy considerations related to the development of a potential Central Bank Digital Currency (CBDC).

## Operational Environment

Although the ATIP Office received slightly fewer privacy requests during this reporting period (6 down from 9), the ATIP Office completed seven [7] requests and eliminated the backlog of carried over requests from previous reporting period. Compared to previous years, the number of requests received was relatively consistent with the 5-year average, while the number of pages processed was fewer than the previous period (1,735 compared to 7,795), and more than three [3] times as many pages were processed informally during this period than in the previous period (see **Informal Requests**). Several requests involved a search through a large volume of records, required legal advice and contained interwoven information. 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.

Though a long-standing resource gap which had persisted over multiple reporting periods was closed this year, major efforts continued throughout the year to onboard and cross-train staff to assume new roles which contributed to some of the delays in response times during this period.

Consistent with a year over year trend, the ATIP office saw a significant and sustained shift of resources allocated to privacy-related work (see **Assessment of Privacy Issues**). While the overall number of requests under the *Access to Information* and *Privacy Acts* remain relatively consistent, the need for timely, robust and comprehensive advice and analysis with respect to the assessment and mitigation of privacy risks increased markedly. Currently, 3 of 4 senior ATIP Office roles are almost entirely dedicated to privacy activities.

Continuous process improvement is key to carrying out the responsibilities associated with the administration of ATIP legislation. Resource time was dedicated to ongoing continuity of operations exercises to ensure that the technology and processes used to manage requests was appropriately updated and optimally functional so as not to cause delays to processing time. Guidance material concerning the application of ATIP exemptions in the Bank context were further refined to provide additional clarity about the requirements for providing recommendations with respect to the treatment of records responsive to a request.

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 workload from Parliamentary Returns remained steady during this period with the Bank receiving 34 Parliamentary Questions and 6 Senate Questions compared to 50 Questions in the previous reporting period. All Parliamentary returns are reviewed to ensure that they comply with the requirements of both the *Access to Information* and *Privacy Acts*.

## Covid-19 Impacts

The ATIP office has fully adjusted to new ways of working as a result of the Covid-19 pandemic. There are no significant impacts to report.

## 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*

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(1 April 2021 to 31 March 2022)





**Statistical Report on the *Privacy Act***

Name of institution: Bank of Canada

Reporting period: 01/04/2021 to 31/03/2022

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

**1.1 Number of requests received**

		Number of Requests
Received during reporting period		6
Outstanding from previous reporting periods		1
- Outstanding from previous reporting period	1	
- Outstanding from more than one reporting period	0	
<b>Total</b>		<b>7</b>
Closed during reporting period		7
Carried over to next reporting period		0
- Carried over within legislated timeline	0	
- Carried over beyond legislated timeline	0	

**1.2 Channels of requests**

Source	Number of Requests
Online	0
E-mail	4
Mail	2
In person	0
Phone	0
Fax	0
<b>Total</b>	<b>6</b>

**Section 2: Informal requests**

**2.1 Number of informal requests**

		Number of Requests
Received during reporting period		1
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
<b>Total</b>		<b>1</b>
Closed during reporting period		1
Carried over to next reporting period		0

**2.2 Channels of informal requests**

Source	Number of Requests
Online	0
E-mail	1
Mail	0
In person	0
Phone	0
Fax	0
<b>Total</b>	<b>1</b>

**2.3 Completion time of informal requests**

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

**2.4 Pages released informally**

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	1	4958	0	0

**Section 3: Requests Closed During the Reporting Period**

**3.1 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	0	1	1	1	0	3
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	3	0	0	0	0	0	0	3
Neither confirmed nor denied	0	0	0	0	0	0	0	0
<b>Total</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>7</b>

**3.2 Exemptions**

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	3
19(1)(f)	0	22.1	0	27	3
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

**3.3 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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	3	0	0	0	0

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper and e-record formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
1735	1410	6

3.5.2 Relevant pages processed by request disposition for paper and e-record formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	1	86	1	486	0	0	1	1163	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	3	0	0	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>4</b>	<b>86</b>	<b>1</b>	<b>486</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1163</b>	<b>0</b>	<b>0</b>

3.5.3 Relevant minutes processed and disclosed for audio formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0

3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	1	1	0	2
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
<b>Total</b>	0	1	1	0	2

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	5
Percentage of requests closed within legislated timelines (%)	71.42857143

3.7 Deemed refusals

3.7.1 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	2	0	0	0



3.7.2 Request 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 timeline 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	0	0	0
181 to 365 days	0	1	1
More than 365 days	0	0	0
<b>Total</b>	0	2	2

3.8 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 4: 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 5: 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>	<b>0</b>

**Section 6: Extensions**

6.1 Reasons for extensions

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	
3	1	1	0	1	0	0	0	0

6.2 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	1	0	1	0	0	0	0
31 days or greater								
<b>Total</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>





8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Section 9: Complaints and Investigations Notices Received**

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

**Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)**

10.1 Privacy Impact Assessments

Number of PIAs completed	1
Number of PIAs modified	0

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	43	0	0	1
Central	0	0	0	0
<b>Total</b>	<b>43</b>	<b>0</b>	<b>0</b>	<b>1</b>

**Section 11: Privacy Breaches**

**11.1 Material Privacy Breaches reported**

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

**11.2 Non-Material Privacy Breaches**

Number of non-material privacy breaches	6
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**Section 12: Resources Related to the Privacy Act**

**12.1 Allocated Costs**

Expenditures		Amount
Salaries		\$572,625
Overtime		\$0
Goods and Services		\$29,482
• Professional services contracts	\$23,730	
• Other	\$5,752	
<b>Total</b>		<b>\$602,107</b>

**12.2 Human Resources**

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	3.970
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
<b>Total</b>	<b>3.970</b>

Note: Enter values to three decimal places.

## Appendix C



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

Name of institution: Bank of Canada

Reporting period: 2021-04-01 to 2022-03-31

#### Section 1: Capacity to Receive Requests under the Access to Information Act and the Privacy Act

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 under the Access to Information Act and the Privacy Act

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	0	52	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	0	52	52



#### Section 3: Open Requests and Complaints Under the Access to Information Act

3.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are Within Legislated Timelines as of March 31, 2022	Open Requests that are Beyond Legislated Timelines as of March 31, 2022	Total
Received in 2021-2022	7	3	10
Received in 2020-2021	0	6	6
Received in 2019-2020	0	1	1
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016 or earlier	0	0	0
<b>Total</b>	<b>7</b>	<b>10</b>	<b>17</b>

Row 8, Col. 3 of Section 3.1 must equal Row 7, Col. 1 of Section 1.1 of the 2021-2022 Statistical Report on the Access to Information Act

3.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2021-2022	3
Received in 2020-2021	3
Received in 2019-2020	0
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	2
Received in 2015-2016 or earlier	0

Total	8
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**Section 4: Open Requests and Complaints Under the Privacy Act**

4.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2022	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2022	Total
Received in 2021-2022	0	0	0
Received in 2020-2021	0	0	0
Received in 2019-2020	0	0	0
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016 or earlier	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

Row 8, Col. 3 of Section 4.1 must equal Row 7, Col. 1 of Section 1.1 of the 2021-2022 Statistical Report on the *Privacy Act*

4.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2021-2022	0
Received in 2020-2021	1
Received in 2019-2020	1
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016 or earlier	0
<b>Total</b>	<b>2</b>

**Section 5: Social Insurance Number (SIN)**

Did your institution receive authority for a new collection or new consistent use of the SIN in 2021-2022?	No
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