



ANNUAL REPORT TO PARLIAMENT

OF THE

BANK OF CANADA

ON THE ADMINISTRATION OF

THE *PRIVACY ACT*

(1 April 2012 to 31 March 2013)

May 2013

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1 April 2012 – 31 March 2013

INTRODUCTION

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 Act* describes the Bank’s legislative framework and sets out the governance of the Bank, as well as its mandate to “promote the economic and financial welfare of Canada.” The Bank strives to meet its mandate through its work in four core areas of responsibility, which are supported by a Corporate Administration function.

Monetary Policy

The Bank contributes to solid economic performance and rising living standards for Canadians by keeping inflation low, stable and predictable. Since 1991, the Bank’s monetary policy actions toward this goal have been guided by a clearly defined inflation target.

Financial System

The Bank promotes a stable and efficient financial system in Canada and internationally. To this end, the Bank oversees Canada’s key payment, clearing and settlement systems; acts as lender of last resort; assesses risks to financial stability; and contributes to the development of financial system policies.

Currency

The Bank designs, produces and distributes Canada’s bank notes and replaces worn notes. It deters counterfeiting through leading-edge bank note design, public education and collaboration with law-enforcement agencies.

Funds Management

The Bank provides effective and efficient funds-management services for the Government of Canada, as well as on its own behalf and for other clients. For the government, the Bank provides treasury-management services and administers and advises on the public debt and foreign exchange reserves. In addition, the Bank provides banking services to critical payment, clearing and settlement systems.

Corporate Administration

Corporate Administration supports the functions of the Bank providing management of human, financial, information, technology and physical resources and related infrastructure.

ADMINISTRATION OF THE *PRIVACY ACT*

Organization of Activities

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 (Attachments A).

The responsibility for administering the Bank's ATIP program lies with the Bank's ATIP section which is part of the Bank's Executive and Legal Services Department (ELS). Under the management of the Access to Information and Privacy Coordinator, five employees are responsible for coordinating the processing of ATIP requests and complaints, providing advice and promoting ATIP awareness to staff and the general public. The ATIP section reports directly to the Deputy Corporate Secretary and Access to Information and Privacy Coordinator who reports to the General Counsel and Corporate Secretary and who in turn reports to the Governor.

Files can be examined at the Bank's Head Office in Ottawa or arrangements can be made at each of the Bank's Regional Offices in five major cities across Canada to review records related to ATIP requests.

Info Source and PA request forms are available on the Bank of Canada's website. As well, request forms are available at kiosks in the lobbies of the Bank's head office in Ottawa.

Formal/Informal Interface

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. The Bank occasionally receives formal requests for information which is normally available to the general public; in these cases the Bank often handles such requests informally through normal business channels. For example, the Bank continues to receive inquiries related to Canada Savings Bond holdings and unclaimed bank balances and directs the requestors to websites or to specific client service work units. As a general rule, and when the requester agrees to it, the Bank treats these requests as informal even if they are submitted as a formal request.

Informal requests for access to personal information by Bank of Canada employees are directed to the Bank's Human Resources service. Alternatively, for various reasons, employees may choose to submit a formal Privacy request to the ATIP Office.

Staff Training

During this reporting period, the ATIP Office delivered 10 training sessions to approximately 181 participants from various business lines within the Bank on the general principles of the Privacy legislation and specifically how it is administered at the Bank. The sessions were delivered in both official languages.

In addition, Privacy awareness and advice with respect to the appropriate management of personal information is factored into discussions with staff and managers as a result of informal inquiries in the course of business. The Bank's practice is to brief Senior Management and the Board of Directors at least annually on Privacy matters.

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

The ATIP Office is drafting a Privacy Policy specific to the Bank which expands on existing Employee Privacy Guidelines and privacy statements. It is expected that it will be approved by the end of 2013. This policy is referenced in the Bank's Code of Business Conduct and Ethics.

PRIVACY ACT

Interpretation of the Statistical Report

The Statistical Report regarding Privacy Act (PA) requests is attached as Attachment B. The Bank of Canada received 5 formal applications for personal information under the Act during this reporting period, compared to 10 in 2011-2012. Three requests were carried forward from the previous reporting period; the Bank therefore completed 8 requests. Information was provided for 3 of these requests. A summary of the disposition of the privacy requests completed during the reporting period is provided below.

Disposition of Requests

All Disclosed

The information requested was disclosed in total for 1 request (12.5% of the total), compared to 2 requests (29% of the total) in 2011-2012.

Disclosed in Part

The information requested was disclosed in part for 2 requests (25% of the total) compared to no requests in 2011-2012.

Abandoned by Applicant

Four requests (50% of the total) were abandoned by the applicants, compared to 2 requests (29% of the total) in 2011-2012.

No Records Exist

One request (12.5% of the total) was for information not found in the Bank, compared to 3 requests (42% of the total) in 2011-2012.

Completion Time and Extensions

None of the 8 requests required a time extension. This is the same as reported in 2011-2012.

Calculation of Costs

The calculation of costs is based on the salaries of dedicated ATIP resources working on activities related to the administration of the PA. This also includes costs associated with Privacy Impact Assessments as well as other operating costs, e.g., supplies. The total cost for administering the program in 2012-2013 was \$178,342, compared to \$187,784 in 2011-2012.

Disclosures under Paragraph 8(2)(m)

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

Assessment of privacy issues

During the current reporting period, the Bank completed two Privacy Impact Assessments (PIA). A PIA was completed on the deployment of a biometric reader for employee access to highly secure areas of the Bank. As well, the Bank completed a PIA on the deployment of a portal application to facilitate access by employers to better manage Canada Savings Bond purchases by employees. These PIAs were conducted to assess compliance of the application with privacy requirements related to the collection, use, retention, disclosure and disposal of personal information. Summaries of the PIAs are available upon request.

In addition to formal PIAs, the Bank conducted privacy reviews related to the implementation of new IT technology as well as developing a framework to be used when contemplated outsourcing arrangements involving personal information.

Other

As part of the work to expand the privacy compliance function within the Bank, the ATIP Office will expand its privacy training material and develop a communication plan to coincide with the introduction of the Privacy Policy. ATIP resource time was also spent working on client activities involving the management of personal information.

The ATIP Office dedicated fifteen percent of ATIP resource time to privacy compliance activities. This is a fifty percent reduction from last year. Activities in this area were adjusted to address resource needs related to the increased number of ATIA requests and complaints.

Complaints and Investigations

There were no formal complaints during this reporting period.



BANK OF CANADA
BANQUE DU CANADA

15 June 2012

To/A Jeremy Farr
General Counsel & Corporate Secretary

From/De Mark Carney
Governor

Marie Bordeleau
Deputy Corporate Secretary/ATIP Coordinator

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

The Governor of the Bank of Canada, pursuant to section 73 of the *Access to Information Act* and the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Governor as the head of a government institution, under the section of the Act set out in the schedule opposite each position.

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/ 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*

22 June 2012
Date


Governor Mark Carney

*refer to attached table for specific delegation

Table of Specific Delegation

* Responsibility Delegated to ATIP Manager – *Privacy Act*

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

* Responsibility Delegated to ATIP Manager– *Access to Information Act*

Sections	Description	Position
8(1)	Transfer of request	ATIP Manager
9	Extensions of time limits	ATIP Manager
11(2) to (6) inclusive	Fees	ATIP Manager
19(1)	Personal information	ATIP Manager

Government
of CanadaGouvernement
du Canada

Statistical Report on the *Privacy Act*

Name of institution: Bank of CanadaReporting period: 01/04/2012 to 31/03/2013

PART 1 – Requests under the *Access to Information Act*

	Number of Requests
Received during reporting period	5
Outstanding from previous reporting period	3
Total	8
Closed during reporting period	8
Carried over to next reporting period	0

PART 2 – Requests closed during the reporting period

2.1 Disposition and completion time

Disposition of requests	Completion Time							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	
All disclosed	0	1	0	0	0	0	0	1
Disclosed in part	0	0	2	0	0	0	0	2
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	1	0	0	0	0	0	0	1
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	4	0	0	0	0	0	0	4
Total	5	1	2	0	0	0	0	8

2.2 Exemptions

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

2.3 Exclusions

Section	Number of requests	Section	Number of requests	Section	Number of requests
69(1)(a)	0	70(1)(a)	0	70(1)(d)	0
69(1)(b)	0	70(1)(b)	0	70(1)(e)	0
69.1	0	70(1)(c)	0	70(1)(f)	0
				70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	1	0	0
Disclosed in part	2	0	0
Total	3	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	5	5	1
Disclosed in part	198	198	2
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	4

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	
	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed
All disclosed	1	5	0	0	0	0	0	0	0	0
Disclosed in part	1	57	1	141	0	0	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
Abandoned	4	0	0	0	0	0	0	0	0	0
Total	6	62	1	141	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation required	Legal advice sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Abandoned	0	0	0	0	0
Total	0	0	0	0	0

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of requests closed past the statutory deadline	Principal Reason			
	Workload	External consultation	Internal consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of days past deadline	Number of requests past deadline where no extension was taken	Number of requests past deadline where an extension was taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

PART 3 – Disclosures under subsection 8(2)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Total
0	0	0

PART 4 – Requests for correction of personal information and notations

	Number
Requests for correction received	0
Requests for correction accepted	0
Requests for correction refused	0
Notations attached	0

PART 5 – Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of requests where an extension was taken	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation or coversation
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

Length of extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

PART 6 – Consultations received from other institutions and organizations

6.1 Consultations received from other government institutions and organizations

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other government institutions

Recommendation	Number of days required to complete consultation requests							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

PART 7 – Completion time of consultations on Cabinet confidences

Number of days	Number of responses received	Number of responses received past deadline
1 to 15	0	0
16 to 30	0	0
31 to 60	0	0
61 to 120	0	0
121 to 180	0	0
181 to 365	0	0
More than 365	0	0
Total	0	0

PART 8 – Resources related to the *Privacy Act*

8.1 Costs

Expenditures		Amount
Salaries		\$97,896
Overtime		\$0
Goods and Services		\$80,446
• Contracts for privacy impact assessments	\$45,200	
• Professional services contracts	\$34,831	
• Other	\$415	
Total		\$178,342

8.2 Human Resources

Resources	Dedicated full-time	Dedicated part-time	Total
Full-time employees	1	0	1
Part-time and casual employees	0	0	0
Regional staff	0	0	0
Consultants and agency personnel	0	0	0
Students	0	0	0
Total	1	0	1

Appendix A

Completed Privacy Impact Assessments (PIAs)

Institution	Number of Completed PIAs
Bank of Canada	2