

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

(1 April 2020 to 31 March 2021)



August 2021

## Contents

Introduction	3
Purpose of the Access to Information Act (ATIA)	3
The Bank of Canada's mandate	3
Monetary Policy	3
Financial System	3
Currency	3
Funds Management	3
Administration of the Access to Information Act	4
Delegation of Authority	4
Organizational Structure to Fulfill Access to Information Act Responsibilities	4
Training and Awareness	5
Institution-specific access to information related policies, guidelines and procedures	6
Key Issues and Actions Taken on Complaints or Audits	6
	-
Monitoring Compliance	6
Interpretation of the Statistical Report (Appendix B)	7
Access Requests	7
Consultations	7
Informal Requests	8
Requests under the ATIA by Source	8
Disposition of Requests	8
Exemptions and Exclusions	9
Extensions	10
Complaints and Investigations	11
Fees	11
Operational Environment	12
Covid-19 Impacts	13
Appendix A	14
Appendix B	16
Appendix C	26

## Introduction

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

As set out in Section 2(1) of the Access to Information Act, the purpose of this Act is "to enhance the accountability and transparency of federal institutions in order to promote an open and democratic society and to enable public debate on the conduct of those institutions." This report is prepared in accordance with Section 70(1)(d) of the Act and is tabled in Parliament in accordance with Section 94(2).

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

### 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 Access to Information 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 70(2) of the Act, the Governor of the Bank of Canada undertakes the responsibilities of the designated Minister for the purposes of subsections 70(1)(a) and (c).

Responsibility for compliance with the requirements of *the Act* has been delegated by the Governor under Section 95(1) 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 (10<sup>th</sup>) 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 Access to Information 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 various files, including confirming Cabinet Confidences.

The Bank also has a network of ATIP departmental contacts throughout the organization. They are responsible for retrieving records and providing initial recommendations to the ATIP Office and departmental sign-off for the final treatment of records. In addition, the Chief of Staff to the Governor and Senior Deputy Governor as well as senior staff in the Communications Department are provided with a copy of any proposed release packages so that they can assess and advise should there be media inquiries.

The Bank of Canada does not currently provide any services related to access to information to any other institution per section 96 of the *Access to Information Act*.

### Training and Awareness

In addition to the ATIP Office's participation in monthly Orientation Sessions for new employees, the ATIP Office also delivered 15 awareness sessions (in both official languages) to 46 participants from various units throughout the Bank during this reporting period. 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, research teams as well as to other business lines 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 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.

During this reporting period, the ATIP Office also renewed engagement with various stakeholders across the Bank to discuss current processes and learn more about significant business lines. The ATIP Office received briefings from, and participated in in-depth awareness sessions with, the Communications, Audit and Enterprise Risk departments as part of a larger initiative aimed at familiarizing the ATIP team with the Bank's work.

The ATIP Office also developed a shadowing opportunity for employees within other Bank departments. A formal introductory session was provided to participants outlining ATIP processes, responsibilities, and key concepts, while a number of follow-up meetings were held directly with analysts to provide shadows with direct exposure to record triage and treatment.

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 access to information related policies, guidelines and procedures

The ATIP Office continued to refine and document all procedures associated with the processing of ATIA requests in order to streamline, to the extent possible, all facets of the request process.

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 also instituted a monthly process review and improvement meeting where team members share ideas for streamlining various ATIP-related processes and divide responsibility for completing these tasks.

## Key Issues and Actions Taken on Complaints or Audits

During this reporting period, the ATIP Office received 5 formal notices of complaint and, following receipt, provided background, contextual information and documentation to the Office of the Information Commissioner (OIC) to support their preliminary investigations. The ATIP office is awaiting further action from the OIC on these files before making formal representations. No decisions or representations have been received from the Office of the Information Commissioner as of the end of this reporting period. 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, 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)

### **Access Requests**

This year, the Bank received 39 requests compared with 33 received the previous reporting period. The new requests, combined with several complex requests carried over from the previous reporting period, accounted for a heavy workload for the ATIP Office. The table and chart below provide an overview of ATIA requests received by the Bank for the past five years and the number of pages processed. The number of pages processed does not reflect 328 pages retrieved, reviewed and deemed not relevant during this period.

Fiscal Year	Requests Received	Requests Outstanding from previous reporting period	Requests completed	Number of pages processed
2016-2017	84	15	83	34,999
2017-2018	38	16	34	2,752
2018-2019	39	20	49	10,793
2019-2020	33	10	33	3,995
2020-2021	39	10	28	1,014

#### Table 1: Overview of ATIA Requests Received and Completed, 5-Year Trend

## Consultations

During this period, the Bank received 19 consultations from other government institutions and 1 from other institutions totalling 1,871 pages to review and closed 23 consultations totalling 1,844 pages. Several consultations were both voluminous and complex in nature, requiring internal consultations with nearly every department within the Bank as well as numerous external consultations. Four consultations are carried over to the next reporting period which accounts for 1,729 additional pages to review.

Table 2: Overview of	Consultations	Received a	nd Completed	5-Year Trend
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Fiscal Year	Consultations Received	Consultations remained outstanding from previous reporting period	Consultations completed	Number of Pages Reviewed
2016-2017	31	2	30	1,132
2017-2018	17	3	18	916
2018-2019	13	2	14	1,198
2019-2020	26	1	20	843
2020-2021	20	7	23	1,844

## **Informal Requests**

In addition to the formal requests for information, the Bank received 6 informal requests (compared to 5 informal requests in the previous reporting period) and processed and completed 6 informal requests amounting to the re-release of 572 pages. On a monthly basis, the Bank publishes a summary of completed ATIA requests which is generally the source of the informal requests.

## Requests under the ATIA by Source

During this reporting period, 15% of requests received by the Bank were from the media, 31% from organizations, 5% from businesses, 23% from individuals who declined to identify as any of the defined categories, 0% from academia, and 26% from the public. This year saw a decline in requests received from the media, but an increase in requests received from the public.



#### Chart 1: Number of Requests Received by Source, 5-Year Trend

## **Disposition of Requests**

The following chart shows the disposition for completed requests during this reporting period. Compared to the previous reporting period, the percentage of requests disclosed in part increased slightly from 58% to 64% while the number of requests where no records exist doubled from 9% to 18%. No requests were treated pursuant to the Decline to Act disposition.



#### Chart 2: Final Disposition of Requests, 2020-2021

## **Exemptions and Exclusions**

The exemption provisions invoked most often in this reporting period were sections 21(1)(a)(b) concerning advice, recommendations and deliberations related to the internal decision-making processes of the Bank; sections 20(1)(b)(c) pertaining to third party information; section 18(d) which concerns the economic interests of Canada; section 13 relating to information obtained in confidence, section 15(1) related to international affairs; and s.19(1) related to personal information. Section 23 related to solicitor client privilege was invoked in three requests during this period and the section 68 exclusion was applied once.

The following chart presents groupings of exemptions most frequently invoked by the Bank.

80 Completed requests with respective 70 60 exemptions invoked 50 40 30 20 10 0 2016-2017 2017-2018 2018-2019 2019-2020 2020-2021 ■ s.13 Information obtained in confidence ■ s.15 International affairs and defence ■ s.16 Law enforcement and investigations ■ s.18 Economic interests of Canada s.19 Personal Information s.20 Third party information s.21 Advice, etc.

Chart 3: Most Frequently Invoked Exemptions, 5-Year Trend

## Extensions

Many of the requests processed by the Bank in 2020-2021 were complex in nature and required consultations with other organizations and third parties. This combined with heavy workloads across the Bank and Covid-19 impacts had a considerable impact on operations not only in the ATIP Office but also for business lines tasked with responding to requests (see **Operational Environment - Covid-19 impacts).** As a result, the Bank claimed time extensions under 9(1)(a), (b) and (c) during the last reporting period equivalent to 54%, 42% and 4% of the 24 total extensions taken respectively.

The ATIP staff endeavour to respect deadlines and routinely keep the requester informed of the status of their requests.

## **Completion Time**

Of the 28 requests completed in this reporting period, 13 requests were closed past the statutory deadline (46.4%). The delays are attributed in large part to the significant workload for both ATIP staff and business lines, as well as major resource shortages in the ATIP Office that were resolved in Q4 of this reporting period (see **Operational Environment**).

Other factors that affected completion timelines included Covid-19 related restrictions, operational impacts and delays, a significant increase in Parliamentary Returns, the negotiating of complex complaint files with both the OIC and OPC, extensive involvement in new or changing Bank processes and programs involving the management of sensitive information, including personal information.





## Complaints and Investigations

During this reporting period, the Bank of Canada received 5 new complaints from the Office of Information Commissioner of Canada (OIC), compared to 1 in the previous reporting period. Three complaints were carried over from the previous year while 0 were resolved. The three complaints carried over, all dating back to previous reporting periods, remain outstanding pending further action from the OIC.

Reporting period	Number of complaints received	Number of complaints carried over from previous reporting period	Complaints resolved	Number of Complaints Outstanding
2016-2017	20	7	11	16
2017-2018	7	16	13	10
2018-2019	0	10	5	5
2019-2020	1	5	3	3
2020-2021	5	3	0	8

Table 3: Complaints received, carried over and resolved, 5-year Trend
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#### Fees

A total of \$175.00 in application fees was collected for 35 of the 39 requests received during the 2020-2021 period, compared to \$160.00 in 2019-2020. A total of \$5.00 in application fees were waived for one of the requests received.

## **Operational Environment**

This year, the Bank of Canada continued to process a significant number of complex and voluminous *Access to Information Act* requests and consultations, several of which were outstanding from the previous reporting period. The requests dealt with sensitive information and required extensive review and consultation. Eight (8) of the 10 requests outstanding from the 2019-2020 reporting period were completed this year – only 2 of those requests are being carried over to the 2021-2022 reporting period, one of which was received on the last day of the fiscal year in 2020. An additional 20 requests were received in the 2020-2021 reporting period are being carried over and are part of the natural carryover cycle that can be expected from one year to the next. Furthermore, the complexity and significant volume of records processed in response to both formal requests made under the *Privacy Act* and informal requests for personal information presented additional challenges.

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.

The ATIP Office also has extensive involvement in new Bank initiatives and process changes involving the management of sensitive information, including personal information. Considerable resource time is dedicated to providing policy advice to Bank stakeholders to ensure awareness of the requirements of ATIP legislation and the practical application of these requirements in business processes. Among these new initiatives, the ATIP office has continued to develop online learning modules for the Bank's compliance and training initiatives and has continued to provide advice concerning preparations for the Bank's new mandate to oversee retail payment service providers (see **Training and Awareness**).

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.

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

#### BANK OF CANADA BANQUE DU CANADA June 3, 2020 From: Tiff Macklem Jeremy Farr To: General Counsel & Corporate Secretary 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 Access to Information Act and Privacy Act and regulations regulations General counsel & corporate secretary Full authority Full authority Deputy corporate secretary and senior Full authority Full authority director, compliance/ Access to information and privacy coordinator 15, and mandatory 8(1), 9(1) and (2), 11(2), and the **Director ATIP** provisions of 26 for all mandatory provisions of 19(1) records\* for all records\*

ur

(Governor Tiff Macklem)

June 3, 2020.

(Date)

\*refer to attached 'Table of Specific Delegation'

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#### **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	Director ATIP
	individual, and shall refuse to disclose such information	
	where disclosure is prohibited under section 8	

\*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.

Statistical Report on Access to Information Act | Page 16

Appendix B

## Statistical Report on Access to Information Act

(1 April 2020 to 31 March 2021)



	Gouvernement lu Canada			
Stati	stical Report on the	Access t	o Information Ac	ct
Name of institution:	Bank of Canada			_
	01/04/2020	to	31/03/2021	
ection 1: Requests	Under the Access to In		ct	
ection 1: Requests	Under the Access to In	formation A	Ct ber of Requests	
ection 1: Requests	Under the Access to Ini	formation A		_
ection 1: Requests 1.1 Number of request Received during reporting	Under the Access to Im sts g period	formation A	ber of Requests	_
Reporting period: ection 1: Requests 1.1 Number of request Received during reporting Outstanding from previou Total	Under the Access to Im sts g period	formation A	ber of Requests 39	
ection 1: Requests 1.1 Number of request Received during reporting Outstanding from previou	Under the Access to Im sts g period us reporting period	formation A	ber of Requests 39 10	

Source	Number of Requests
Media	6
Academia	0
Business (private sector)	2
Organization	12
Public	10
Decline to Identify	9
Total	39

#### 1.3 Informal requests

Completion Time							
1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days			More Than 365 Days	
2	0	1	0	3	0	0	6

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

TBS/SCT 350-62

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#### Section 2: Decline to act vexatious, made in bad faith or abuse of right requests

Г	Number of Requests
Outstanding from previous reporting period	0
Sent during reporting period	0
Total	0
Approved by the Information Commissioner during reporting period	0
Declined by the Information Commissioner during reporting period	0
Carried over to next reporting period	0

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

3.1 Disposition and completion time

	Completion Time							
Disposition of 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
All disclosed	0	0	0	1	0	0	0	1
Disclosed in part	0	1	2	6	3	5	1	18
All exempted	0	0	0	1	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	1	2	1	1	0	0	0	5
Request transferred	1	0	0	0	0	0	0	1
Request abandoned	2	0	0	0	0	0	0	2
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Decline to act with the approval of the Information Commisioner	0	0	0	0	0	0	0	0
Total	4	3	3	9	3	5	1	28

#### 3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	2	16(2)	0	18(a)	1	20.1	0
13(1)(b)	7	16(2)(a)	0	18(b)	0	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	2	18(d)	9	21(1)(a)	10
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	13
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	1
14(a)	4	16.1(1)(b)	0	18.1(1)(c)	0	21(1)(d)	0
14(b)	1	16.1(1)(c)	0	18.1(1)(d)	0	22	0
15(1)	0	16.1(1)(d)	0	19(1)	10	22.1(1)	0
15(1) - I.A.*	10	16.2(1)	0	20(1)(a)	1	23	3
15(1) - Def.*	0	16.3	0	20(1)(b)	8	23.1	0
15(1) - S.A.*	0	16.31	0	20(1)(b.1)	0	24(1)	0
16(1)(a)(i)	0	16.4(1)(a)	0	20(1)(c)	7	26	0
16(1)(a)(ii)	0	16.4(1)(b)	0	20(1)(d)	0		
16(1)(a)(iii)	0	16.5	0			•	
16(1)(b)	0	16.6	0				
16(1)(c)	2	17	0				
16(1)(d)	0	* I.A.:	International A	ffairs Def .:	Defence of	f Canada	S.A.: Subve

#### 3.3 Exclusions

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

#### 3.4 Format of information released

Paper	Electronic	Other		
. 9	10	0		

3.5 Complexity

3.5.1 Relevant pages processed and disclosed

	Number of Pages Processed	Number of Pages Disclosed	Number of Requests	
Γ	1014	1000	22	

Less Than 100 Pages Processed		Pa	101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
Disposition	Number of Requests	Pages Disclosed	Number of Request s	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	1	7	0	0	0	0	0	0	0	0
Disclosed in part	16	472	2	521	0	0	0	0	0	0
All exempted	1	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	2	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0	0	0
Total	20	479	2	521	0	0	0	0	0	0

#### 3.5.2 Relevant pages processed and disclosed by size of requests

#### 3.5.3 Other complexities

Disposition	Consultation Required	Assessment of Fees	Legal Advice Sought	Other	Total
All disclosed	0	0	1	0	1
Disclosed in part	11	0	2	0	13
All exempted	0	0	1	0	1
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0
Total	11	0	4	0	15

#### 3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	15
Percentage of requests closed within legislated timelines (%)	53.6

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

	Principal Reason					
Number of Requests Closed Past the Legislated Timelines	Interference with Operations / Workload	External Consultation	Internal Consultation	Other		
13	10	2	1	0		

3.7.2 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 Timeline Where an Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	4	4
31 to 60 days	0	1	1
61 to 120 days	0	4	4
121 to 180 days	1	0	1
181 to 365 days	0	3	3
More than 365 days	0	0	0
Total	1	12	13

3.8 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 4: Extensions

#### 4.1 Reasons for extensions and disposition of requests

		9(1)(b) Consultation		
Disposition of Requests Where an Extension Was Taken	9(1)(a) Interference With Operations	Section 69	Other	9(1)(c) Third-Party Notice
All disclosed	1	0	0	0
Disclosed in part	10	0	10	1
All exempted	1	0	0	0
All excluded	0	0	0	0
No records exist	1	0	0	0
Request abandoned	0	0	0	0
Decline to act with the approval of the Information Commisioner	0	0	0	0
Total	13	0	10	1

4.2 Length of extensions

	9(1)(a)	9(1)(b) Co		
Length of Extensions	Interference With Operations	Section 69	Other	9(1)(c) Third-Party Notice
30 days or less	11	0	3	0
31 to 60 days	2	0	4	1
61 to 120 days	0	0	3	0
121 to 180 days	0	0	0	0
181 to 365 days	0	0	0	0
365 days or more	0	0	0	0
Total	13	0	10	1

### Section 5: Fees

	Fee C	ollected	Fee Waived	or Refunded
Fee Type	Requests	Amount	Requests	Amount
Application	35	\$175	1	\$5
Other fees	0	\$0	0	\$0
Total	35	\$175	1	\$5

#### Section 6: Consultations Received From Other Institutions and Organizations

#### 6.1 Consultations received from other Government of Canada institutions and organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during reporting period	19	1866	1	5
Outstanding from the previous reporting period	7	1702	0	0
Total	26	3568	1	5
Closed during the reporting period	22	1839	1	5
Carried over to next reporting period	4	1729	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

	N	umber of	Days Requ	ired to C	omplete	Consultat	ion Requ	lests
Recommendation	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	3	3	0	1	0	0	0	7
Disclose in part	1	2	7	1	1	2	1	15
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	4	5	7	2	1	2	1	22

6.3 Recommendations and completion time for consultations received from other organizations

	N	Number of Days Required to Complete Consultation Requests							
Recommendation	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	1	0	0	0	0	0	0	1	
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	1	0	0	0	0	0	0	1	

#### Section 7: Completion Time of Consultations on Cabinet Confidences

#### 7.1 Requests with Legal Services

		'han 100 rocessed		0 Pages cessed	501-1 Pages Pr			-5000 rocessed	10000000000000000	han 5000 rocessed
Number of Days	Number of Requests	Pages Disclosed	Number of Request	Pages	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	2	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	2	0	0	0	0	0	0	0	0	0

#### 7.2 Requests with Privy Council Office

		'han 100 rocessed		101–500 Pages Processed				1001-5000 Pages Processed		More Than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Request	Pages Disclosed	Number of Requests		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

Section 32 Notice of intention to investigate	Subsection 30(5) Ceased to investigate	Section 35 Formal representations	Section 37 Reports of finding received	Section 37 Reports of finding containing recommendations issued by the Information Commissioner	Section 37 Reports of finding containing orders issued by the Information Commissioner
5	0	0	0	0	0

#### Section 9: Court Action

9.1 Court actions on complaints received before June 21, 2019 and on-going

Section 41 (before June 21, 2019)	Section 42	Section 44
0	0	0

#### 9.2 Court actions on complaints received after June 21, 2019

Section 41 (after June 21, 2019)								
Complainant (1)	Institution (2)	Institution (2) Third Party (3) Privacy Commissioner (4) Total						
0	0 0 0 0							

#### Section 10: Resources Related to the Access to Information Act

10.1 Costs

Expenditures	Amount					
Salaries	\$590,813					
Overtime	Overtime					
Goods and Services		\$0				
<ul> <li>Professional services contracts</li> </ul>	\$0					
• Other	\$0	1				
Total		\$590,813				

#### 10.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	4.590
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	4.590

Note: Enter values to three decimal places.

## Appendix C

of Canada du C	ivernement Canada			
Supplemental St	-	ort on the Ac Privacy Act	cess to Inform	nation Act and
Name of institution:	Bank of Canada	3		
Reporting period:	2020-04-0	01 to	2021-03-31	
Section 1: Capacity to I	Receive Request	ts		
Able to receive requests by mail Able to receive requests by email				
Able to receive requests by	mail		52	
	email	uest service	52 52 0	
Able to receive requests by	email ough the digital req		52	
Able to receive requests by Able to receive requests thr Section 2: Capacity to R 2.1 Enter the number of	email ough the digital req Process Records	S	52 0	r records in differen
Able to receive requests by Able to receive requests thr Section 2: Capacity to R	email ough the digital req Process Records	S	52 0	r records in differen
Able to receive requests by Able to receive requests thr Section 2: Capacity to F 2.1 Enter the number of classification levels.	email ough the digital req Process Records f weeks your ins	s stitution was able	52 0	
Able to receive requests by Able to receive requests thr Section 2: Capacity to R 2.1 Enter the number of	email ough the digital req Process Records f weeks your ins No Capacity 0	s stitution was able Partial Capacity	52 0 e to process pape Full Capacity	Total

	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

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