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### Introduction

### Purpose of the *Privacy Act*

The *Privacy Act* gives everyone the right to access their own personal information held by federal government institutions, and protects that information against unauthorized collection, use, retention, and disclosure.

Access to Information, including personal information, is a quasi-constitutional right in Canada. The *Privacy Act* also enables individuals to exercise their privacy rights.

This report, prepared and tabled in accordance with section 72 of the *Privacy Act*, describes the Bank of Canada's privacy activities for 2022–23.

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

### About the Bank of Canada

#### Our Mandate

The Bank of Canada is the nation's central bank. We were founded as Canada's central bank in 1934 and opened our doors in March 1935. In 1938, we became a Crown corporation belonging to the federal government. Our main role, as defined in the *Bank of Canada Act*, is "to promote the economic and financial welfare of Canada."

The Bank's main responsibilities include:

- conducting monetary policy to keep inflation low and stable
- promoting a safe, sound, and efficient financial system
- issuing currency
- managing the Government of Canada's public debt programs and foreign exchange reserves
- supervising payment service providers (as set out in the Retail Payment Activities Act)

For more information about these responsibilities, visit the Bank of Canada's website.

As a federal government institution, the Bank remains accountable to the public and provides access to personal information and ensures privacy protections are in place for the Bank's operations in compliance with the *Privacy Act*.

## Administration of the *Privacy Act*

## Organizational Structure and Delegated Authority

The Bank's Executive and Legal Services (ELS) Department 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. The ATIP Office within ELS administers the Bank's access to information and privacy (ATIP) program.

The Governor of the Bank of Canada, as the head of the institution, is responsible for the Bank's administration of the *Privacy Act* under section 71(2) of the act. Under section 73(1), the Governor delegates this authority to the Bank's:

- General Counsel & Corporate Secretary
- Deputy Corporate Secretary & Senior Director, Compliance (who serves as the ATIP Coordinator)
- ATIP Director

A copy of the Bank's Delegation Order is available in Annex A.

The ATIP Office, under the guidance of the Corporate Secretary and Deputy Corporate Secretary, processes requests, provides training on access and privacy matters to Bank staff, and develops and implements policies and procedures to ensure that the Bank meets its obligations under the Acts. The ATIP Office also coordinates the Bank's response to parliamentary returns. In 2022–23, the ATIP Office was comprised of the ATIP Director, three Senior ATIP Specialists, four ATIP Analysts, one ATIP Assistant, and one Consultant. The ATIP Office is supported by a Senior Legal Counsel who provides advice on legal and compliance issues related to the administration of the Act and confirms if records contain Cabinet Confidences.

The Bank also has a network of contacts within each department who are responsible for retrieving relevant records and providing advice about the sensitivity of information within the records to the ATIP Office. Privacy requests are treated with the highest discretion because of the care that must be taken when handling sensitive personal information. Information about privacy requests is therefore only shared on a need-to-know basis.

In part, the *Privacy Act* serves to provide individuals with a right of access to the personal information about themselves held by a government institution. If the ATIP Office receives a formal request for information that is typically available to the individual through a direct channel, such as information related to Unclaimed Properties, the ATIP Office will coordinate a response to the requester, including through these other channels, as required.

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

#### Monitoring Compliance

The ATIP Office holds weekly meetings to discuss and closely monitor all active files and keep senior staff, such as the ATIP Director, informed of operations. These meetings help the ATIP Office to better manage heavy workloads and improve response times to external requesters and internal clients.

In addition to these weekly team meetings, the Senior ATIP Specialists oversee different areas of work and support and train more junior staff in their daily responsibilities.

The ATIP Office briefs senior management and the Board of Directors on operational metrics, strategic priorities, and compliance with Bank policies, bi-annually, and annually on the overall administration of the ATIP program.

## Statistics and trends in 2022–23

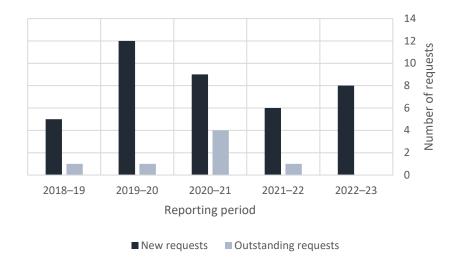
The following section sets out some statistical highlights from the Bank's Statistical Report on the *Privacy Act*, including notable trends about workload, timeliness, and disclosure. Copies of the statistical report and supplemental report are attached in <u>Annex B</u> and <u>Annex C</u>.

#### Workload

#### Formal requests

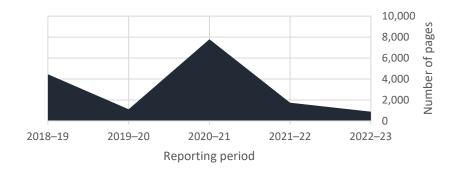
The Bank received 8 new formal privacy requests in 2022–23 (**Chart 1**). This represents a 33% increase from the 6 requests received in 2021–22. The Bank had no outstanding requests from the previous reporting period to process in 2022-23.

Chart 1: Formal request workload, 5-year trend



During this reporting period, 7 requests were completed, for a total output of 878 pages processed compared with 1,735 pages in 2021–22 (Chart 2). The remaining 1 request was carried over to 2023–24.

Chart 2: Number of formal pages processed, 5-year trend



#### Informal requests

The Bank received 4 informal privacy requests in 2022–23, all of which were received by e-mail. All 4 were completed, accounting for 156 pages released. No requests were carried over to 2023–24.

#### Consultations

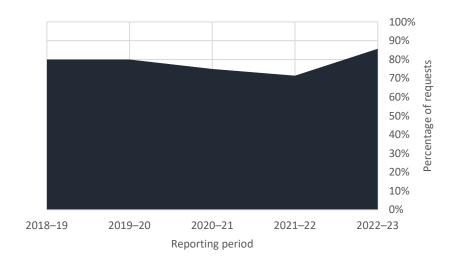
The Bank did not receive or process any consultations under the *Privacy Act* in 2023–24.

#### **Timeliness**

### Completion times

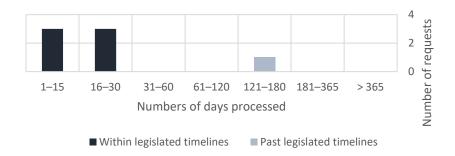
For formal privacy requests, institutions are required to respond to requesters within the legislated timelines. The target for responding to requesters is 30 days, however institutions may formally extend this deadline, if required. Of the 7 formal requests completed in 2022-23, 6 were closed within legislated timelines. This represents an 86% completion rate for on-time requests compared with 71% in 2021–22 (Chart 3).

Chart 3: Percentage of requests responded to within legislated timelines, 5-year trend



While most requests took fewer than 31 days to process and were completed on time, 1 request was completed past the legislated timelines (**Chart 4**).

Chart 4: Number of days to process requests, 1-year trend



Requests that are completed past the legislated timelines are typically more complex. They may have a broad scope, involve a large volume of records to triage and review for relevancy, include a high number of relevant records to treat for sensitivities, or have similar sensitive information interwoven across records within the same request or across multiple requests that must be treated consistently.

No major request complexities were reported in 2022-23.

ATIP staff endeavour to respect deadlines and routinely keep requesters informed of the status of their requests. Information about active requests carried over to 2023-24 within and beyond legislated timelines can be found in section 4.1 of the supplemental statistical report (Annex C).

#### Extensions

If significant delays are anticipated when processing a request, institutions may formally extend the legislated timeline. The *Privacy Act* only allows for a maximum extension of 30 additional days. In 2022-23, the Bank took 1 extension on the 7 completed requests because meeting the original time limit of 30 days would unreasonably interfere with the institution's operations.

The ATIP Office limits inter-institutional consultation to when required for the proper exercise of discretion or when there is an intention to disclose. The ATIP Office makes every effort to ensure that extensions taken are for a reasonable amount of time.

#### Disclosure

In the spirit of the Act, the Bank seeks to release as much information as possible, withholding only what is permitted by law. Of the 7 requests closed in 2022–23, 29% were fully disclosed, 14% were disclosed in part and 57% requests did not result in the release of records as it was determined that no records exist.

Of the total 878 pages processed in 2022–23, 82% were either fully disclosed or disclosed in part. Of the records released, 2 packages were provided to requesters in paper format, 1 in electronic format.

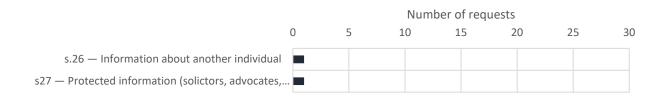
No audio or video records were processed for the requests completed this reporting period.

#### Severances

#### Exemptions

Responsive records may contain information that is subject to the limited and specific legal protections outlined in the *Privacy Act*. In 2022–23, the Bank invoked 2 different exemptions under 2 sections of the Act to sever information in the 1 request that was disclosed in part (**Chart 5**).

**Chart 5: Exemptions invoked** 



Exemptions under sections 26 and 27 are some of the most common exemptions invoked for *Privacy Act* requests, as records that contain personal information can be highly sensitive and involve more than one individual.

#### **Exclusions**

Responsive records may also contain information to which the *Privacy Act* does not apply, such as personal information that is publicly available or Confidences of the Privy Council for Canada (cabinet confidences). Institutions do not have to release this type of information because the Act considers these records to be excluded material.

No exclusions were invoked under the *Privacy Act* in 2022–23.

#### Requests for translation

Individuals submitting requests under the *Privacy Act* may request to have responsive records translated to either of Canada's official languages. The Bank did not receive or process any requests for translation in 2022-23.

#### Requests for correction to personal information

Individuals can also request that a correction be made to their own personal information under control of the Bank. In 2022–23, the Bank received 1 request for a correction to personal information, which was accepted.

#### Public interest disclosures

There are limited and specific cases where personal information may be disclosed without the consent of the individual in question. These limited circumstances are outline in section 8(2) of the *Privacy Act*. The Bank did not make any public interest disclosures under section 8(2)(e), 8(2)(m), or 8(5) of the *Privacy Act in* 2022-23.

### Key issues or actions taken on complaints or audits

#### Complaint Investigations

The Bank did not receive any formal notices of complaint under section 31 of the *Privacy Act* in 2022–23. This represents a 100% decrease from the 1 formal notice received in 2021–22. Two complaints remain outstanding pending further action from the Office of the Privacy Commissioner of Canada. The Bank made formal representations on these files in 2020.

#### Reports of findings

The Bank did not receive any final reports of findings under section 35(1) of the Act. The Office of the Privacy Commissioner did not issue any formal recommendations to the Bank in 2022–23.

The Bank had 2 complaints outstanding at the end of the reporting period. Information about active complaints carried over to 2023-24 can be found in section 4.2 of the supplemental statistical report (Annex C).

#### **Audits**

No audits of the ATIP Office were conducted or completed in 2022-23.

## Privacy activities at the Bank

#### Information holdings

To assist individuals with making a privacy request or with exercising their privacy rights, the Bank publishes an inventory of its information holdings on its website. This public inventory, known as *Info Source*, describes the Bank's functions, programs and activities, and their related classes of records and personal information banks.

Personal information banks, in particular, detail the types of personal information about members of the public as well as current and former employees contained in records created, collected and maintained in the course of Bank business that are accessible under the *Privacy Act*.

In 2022-23, the Bank maintained 42 institution-specific personal information banks. The Bank modified 1 information bank related to retail debt product surveys (PPU 040) and decommissioned 1 information bank related to continuity of operations (PPU 060).

### Improving access to information

The Bank is committed to making personal information available to the public, including through the access to information and privacy program. The ATIP Office strives to make the delivery of ATIP services as seamless as possible and regularly reviews processes for improvements. Currently, the office is undertaking a multi-year initiative to modernize its case management system to improve efficiencies in the processing of requests and to enable better access for the public.

The Bank is also committed to fostering Indigenous inclusion, recognizing its responsibility to advance the objectives of economic reconciliation as recommended by the Truth and Reconciliation Commission. To make access to personal information and privacy more inclusive and facilitate culturally appropriate services for Indigenous requesters, staff are encouraged to take the Bank's Indigenous cultural awareness training.

The ATIP Office also closely monitors trends for incoming privacy request to identify types of frequently requested information and assesses the feasibility of making that information available by other means.

#### Enforcement of the Act

#### Code of Business Conduct and Ethics

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. Within the Code, the Bank recognizes and accepts its responsibility to safeguard the privacy, confidentiality, and security of all personal information under its control, in compliance with the *Privacy Act*. Staff are reminded of their responsibilities regarding the collection, use and disclosure of personal information, as well as their own privacy rights, and are required to acknowledge their responsibilities and obligations under the Act as part of this annual exercise.

#### Training Bank staff

As employees of a federal institution, all Bank staff are responsible for upholding the principles of the Act and all staff need to be prepared to support the fulfillment of personal information requests in the course of their daily business. To promote awareness of their roles and responsibilities, all staff receive mandatory ATIP training through a virtual learning module as part of the Bank's onboarding process. In 2022-23, 658 employees completed the ATIP awareness module.

The ATIP Office has developed 2 additional learning modules specific to protecting personal information and the principles of the *Privacy Act*. In 2022-23, 2,792 employees completed one or more of these online learning modules.

The ATIP Office also offers ad hoc virtual and in-person training and awareness sessions to Bank staff. These sessions focus on the administration of the *Privacy Act*, the Bank's privacy framework and risk management tools, best practices for managing personal information, privacy breach awareness, and mandatory training for staff who engage with sensitive datasets. Staff can also request targeted sessions or more intensive workshops on any topic related to privacy. In 2022-23, the ATIP Office delivered 33

sessions to 199 participants across Bank departments (compared with 26 sessions to 174 participants in 2021-22).

#### Monitoring legislative changes

The ATIP Office proactively monitors a variety of information networks for any coming changes to legislation that might impact the Bank. This proactive approach allows the Bank to plan effectively and implement any necessary structural or operational changes in a timely manner to ensure the Bank's compliance.

The ATIP Office is currently tracking potential privacy policy changes related to Bill C-27, also known as the *Digital Charter Implementation Act of 2022*. If passed, this bill could result in the enactment of three separate pieces of legislation:

- the Consumer Privacy Protection Act
- the Personal Information and Data Protection Tribunal Act
- and the Artificial Intelligence and Data Act

Each of these Acts would have major implications for the protection of personal information at various levels of government.

The ATIP Office also continues to support the Bank's compliance with the *Accessible Canada Act*, contributing to the Bank's *Accessible Canada Act* Plan and working closely with the Bank's Accessibility Committee to ensure privacy rights are respected for ongoing projects or initiatives.

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

#### Assessing privacy issues and providing policy advice

As privacy experts for the institution, the ATIP Office has a responsibility to ensure that privacy considerations are factored into decision-making processes at the Bank.

The ATIP Office formally engages with all areas of the Bank during the institution's annual planning exercise to identify initiatives that will directly or indirectly involve creating, collecting, or managing personal information.

The ATIP Office also participates on various internal governance committees, providing ongoing input and timely feedback to key stakeholders about the Bank's information and data management policies and practices. This includes major Bank initiatives such as supervising retail payment service providers and researching a potential central bank digital currency.

The pace of technological change continues to accelerate and the cycles for implementing 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.

The ATIP Office also collaborates with data management stakeholder groups, given the increasing interest in using new and existing data sets to carry out business activities. The Bank has fully embraced the use of data to inform decision-making, and the ATIP office provides ongoing advice about how to protect privacy rights when that data contains personal information.

The ATIP Office also continues to educate Bank staff about risk ownership, especially for data owners and stewards, and their responsibilities to adhere to the principles of the Privacy Act in the course of their daily business.

#### Privacy impact assessments

A privacy impact assessment (PIA) is an extensive formal privacy review used to assess and evaluate privacy, confidentiality or security risks associated with the collection, use or disclosure of personal information, and to develop measures intended to mitigate and, wherever possible, eliminate identified risks. The Bank contracts third-party service providers to conduct its PIA assessments.

In 2022–23, the Bank completed 1 PIA assessing the privacy impact of analyzing data through the Bank's Data Lake, a central data repository that securely stores and gives the ability to manage and work with different types of data coming from various sources at any scale.

Summaries of completed PIAs are available upon request.

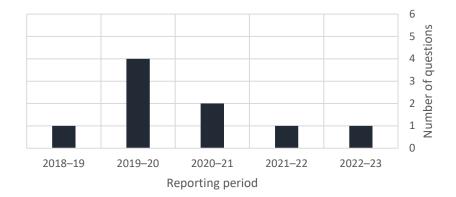


Chart 6: Privacy impact assessments completed, 5-year trend

### Privacy checklists

A Privacy Checklist is a less intensive privacy review used to assess whether a Bank project or initiative involves the collection, use, or disclosure of personal information, and whether the project might introduce privacy risks to individuals or to the Bank.

In 2022-23, the ATIP Office reviewed 29 initiatives through privacy checklists.

45 40 Number of questions 35 30 25 20 15 10 0 2018-19 2019-20 2020-21 2021-22 2022-23 Reporting period

Chart 7: Privacy checklists completed, 5-year trend

#### Third-party risk management

The ATIP Offices continues to participate as a key stakeholder in the Bank's Third-Party Risk Management Program. This program helps the Bank assess the policies and practices of vendors being considered for the delivery of services to ensure that they have robust risk management frameworks, policies and processes in place to effectively safeguard Bank information.

The TPRM program leverages a series of graduated assessment tools to rigorously test vendors' practices to ensure they meet or exceed the Bank's risk thresholds. The ATIP Office is responsible for assessing the vendors privacy practices and ensuring that measures are in place to manage personal information appropriately in their delivery of these services.

In 2022-23, the ATIP Office evaluated 15 due diligence questionnaires and 54 criticality and exposure filter assessments for a variety of vendors and third-party initiatives.

#### Audio-video recording

Remote and flexible working arrangements have increased the need for ways to collaborate and communicate with colleagues through digital technology, including recorded content. While convenient ways of communicating information, recording audio and video content introduces privacy risks related to the collection, management, and use of personal information such as images, voices, and recorded commentary. Access to audio and video recording technology by Bank staff is contingent on the advice provided by the ATIP Office on a case-by-case basis.

In 2022-23, the ATIP Office provided assessments or approvals for 39 recording requests compared with 62 in 2021-22.

A framework and guidelines are being developed to streamline this process and ensure that privacy considerations are factored into the decision to use recording technology, eliminating the need for individual review of all recording requests by the ATIP Office. Unique requests may still require a more hands-on review in the future.

#### Investigating privacy incidents

#### *Incident response*

As a member of the Bank's Cyber Incident Response Team (CIRT), the ATIP Office plays a critical role in investigating suspected or confirmed privacy breaches. The privacy chapter of the cyber incident response plan is updated regularly to ensure privacy best practices are incorporated.

Staff are aware of the importance of timely reporting of situations involving a possible or actual breach of personal information, and the Bank's breach reporting tools enable thorough reporting of incidents, rapid containment of situations, appropriate and timely notifications to affected individuals, and remedial actions after the event.

#### Non-material breaches

Of the privacy incidents reported to the ATIP Office, 6 non-material breaches were identified. Breaches during this reporting period did not introduce any significant risks, and most incidents continue to stem from simple human error.

#### *Material breaches*

The Treasury Board of Canada Secretariat defines a material privacy breach as a breach of sensitive personal information that could reasonably be expected to cause serious injury or harm to the individual, involves a large number of affected individuals or a combination of both.

None of the 6 confirmed breaches in 2022–23 met the threshold for a material privacy breach.

## Operational environment

### **Resource Constraints**

In 2022-23, the Bank continued to process a high volume of Access to Information and Privacy (ATIP) requests, as well as a high volume of internal requests for policy advice. Formal request processing delays are attributed in large part to this significant workload on the part of both the ATIP team and other Bank staff who support the administration of the Acts.

The ATIP Office is currently dedicating more resources and time in new and more targeted ways to support the Bank's innovative data initiatives and assess privacy risks, while also trying to balance its responsibilities to respond to public information requests. This resource shift is reflected in section 11 of the Statistical Report on the Access to Information Act and section 12 of the Statistical Report on the *Privacy Act,* respectively.

The ATIP Office made efforts to increase resource capacity in 2022-23 by adding 2 project-related fulltime positions to its roster, however these positions were only filled after the 2022-2023 reporting period and will be reflected in 2023-24.

## COVID-19 impacts

The ATIP office has fully adjusted to new ways of working due to the COVID-19 pandemic and has no significant impacts to report.

## ANNEX A: Delegation order



June 3, 2020

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	Privacy Act and regulations	Access to Information Act 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)

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

<sup>\*</sup>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.

# ANNEX B: 2022–23 statistical report on the *Privacy Act*

Name of institution:	Bank of Canada
Reporting period:	01/04/2022 to 31/03/2023

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

## 1.1 Number of requests received

	Number of Requests	
Received during reporting period	8	
Outstanding from previous reporting periods	0	
Outstanding from previous reporting period	0	
Outstanding from more than one reporting period		
Total		8
Closed during reporting period		7
Carried over to next reporting period		1
Carried over within legislated timeline	1	
Carried over beyond legislated timeline	0	

### 1.2 Channels of requests

Source	Number of Requests
Online	0
E-mail	2
Mail	6
In person	0
Phone	0
Fax	0
Total	8

## Section 2: Informal requests

## 2.1 Number of informal requests

	Number of Requests	
Received during reporting period	4	
Outstanding from previous reporting periods		0
Outstanding from previous reporting period	0	
Outstanding from more than one reporting period		
Total	4	
Closed during reporting period	4	
Carried over to next reporting period	0	

## 2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	4
Mail	0
In person	0
Phone	0
Fax	0
Total	4

## 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		
1	1	1	1	0	0	0	4		

## 2.4 Pages released informally

Less than 100 Pages Released			100-500 Pages Released		00 Pages ased	1001-5000 Pages Released		More Th Pages R	an 5000 eleased
Number of	Pages Released	Number of	Pages Released		Pages Released	Number of	Pages Released		Pages Released
Requests		Requests		Requests		Requests		Requests	
3	38	1	118	0	0	0	0	0	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	More Than 365 Days	Total
All disclosed	1	1	0	0	0	0	0	2
Disclosed in part	0	0	0	0	1	0	0	1
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	2	2	0	0	0	0	0	4
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	3	3	0	0	1	0	0	7

### 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	1
19(1)(f)	0	22.1	0	27	1

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		Elect	Other		
	E-record	Data set			
2	1	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
878	723	3

## 3.5.2 Relevant pages processed by request disposition for <u>paper</u> and <u>e-record</u> formats by size of requests

	Pa	an 100 ges essed		0 Pages essed		00 Pages essed	Pa	-5000 ges essed	5000	Than Pages essed
Disposition	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	2	8	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	1	870	0	0	0	0

All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2	8	0	0	1	870	0	0	0	0

### 3.5.3 Relevant minutes processed and disclosed for <u>audio</u> 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

	Less than 6	60 Minutes essed		Minutes essed	More than 120 Minutes Processed		
Disposition	Number of Requests 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	
Total	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

	Less than 60 Minutes Processed			Minutes essed	More than 120 Minutes Processed		
Disposition	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	
Total	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	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

## 3.6 Closed requests

## 3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	6
Percentage of requests closed within legislated timelines (%)	85.71428571

#### 3.7 Deemed refusals

### 3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past		Principal Reason						
the legislated timelines	Interference with operations / Workload	External Consultation	Internal Consultation	Other				
1	1	0	0	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	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	0	0
More than 365 days	0	0	0
Total	0	1	1

### 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: 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 to Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	1
Total	1

## Section 6: Extensions

#### **6.1** Reasons for extensions

Number of extensions taken	15(a)		rference ations	with	15(a)(ii	) Consult	ation	15(1)(b) Translation	
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	ce		purposes or conversion	
1	0	1	0	0	0	0	0	0	

### 6.2 Length of extensions

Number of extensions taken	15(a)		rference ations	with	15(a)(ii	) Consult	15(1)(b) Translation		
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet External Inter Confidence Section (Section 70)			purposes or conversion	
1 to 15 days	0	0	0	0	0	0	0	0	
16 to 30 days	0	1	0	0	0	0	0	0	
31 days or greater								0	
Total	0	1	0	0	0	0	0	0	

## Section 7: Consultations Received From Other Institutions and Organizations

### 7.1 Consultations received from other Government of Canada Institutions and other organizations

Consultations	Government of Canada Institutions	Numbers of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

### 7.2 Recommendations and completion time for consultations received from other Government of **Canada institutions**

Recommendation	Numl	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	More Than 365 Days	Total
Disclosed entirely	0	0	0	0	0	0	0	0
Disclosed 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 institutions	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

## 7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

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	More Than 365 Days	Total	
Disclosed entirely	0	0	0	0	0	0	0	0	
Disclosed 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 institutions	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	

## Section 8: Completion Time of Consultations on Cabinet Confidences

### 8.1 Requests with Legal Services

Number of Days	Fewer than 100 Pages Processed			0 Pages essed		00 Pages essed	Pa	-5000 ges essed	5000	Than Pages essed
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

### 8.2 Requests with Privy Council Office

Number of Days	Pa	han 100 ges essed		0 Pages essed		00 Pages essed	Pa	-5000 ges essed	5000	Than Pages essed
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

## Section 9: Complaints and Investigation Notices Received

Section 31	Section 33	Section 35	Court Action	Total
0	0	0	0	0

## 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	42	0	1	1
Central	0	0	0	0
Total	42	0	1	1

## 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	\$600,243	
Overtime	\$0	
Goods and Services		\$31,075
Professional service contracts	\$22,600	
Other	\$8,475	
Total	·	\$631,318

#### 12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	4.030
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	4.030

# Annex C: 2022–23 Supplemental Statistical Report on the Access to Information Act and the Privacy Act

Name of institution:	Bank of Canada
Reporting period:	2022-04-01 to 2023-03-31

### 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, 2023	Open Requests that are Beyond Legislated Timelines as of March 31, 2023	Total
Received in 2022-2023	14	3	17
Received in 2021-2022	0	5	5
Received in 2020-2021	0	2	2
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	0	0	0
Received in 2014-2015	0	0	0
Received in 2013-2014 or earlier	0	0	0
Total	14	11	25

## 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 2022-2023	1
Received in 2021-2022	0
Received in 2020-2021	2
Received in 2019-2020	0
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016	0
Received in 2014-2015	0
Received in 2013-2014 or earlier	0
Total	3

## 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 Within Legislated Timelines as of March 31, 2023	Open Requests that are Beyond Legislated Timelines as of March 31, 2023	Total
Received in 2022-2023	1	0	1
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	0	0	0
Received in 2014-2015	0	0	0
Received in 2013-2014 or earlier	0	0	0
Total	1	0	1

## 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 2022-2023	0
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	0
Received in 2014-2015	0
Received in 2013-2014 or earlier	0
Total	2

## Section 5: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in	No
2022-2023?	

# Section 6: Universal Access under the Privacy Act

How many requests were received from confirmed foreign nationals outside of	0
Canada in 2022-2023?	