



BANK OF CANADA
BANQUE DU CANADA

Annual Report on the Administration of the *Access to Information Act*

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Table of Contents

Introduction.....	1
Bank of Canada Mandate.....	1
Delegation and Organizational Structure	1
Performance 2024-2025	2
Formal Requests	2
Informal Requests.....	2
Consultations	3
Extensions	3
Complaints	3
Parliamentary Returns.....	3
Training and Awareness Program	4
Institution Specific Policies, Guidelines and Procedures	4
Initiatives and Projects to Improve Access to Information	4
Monitoring Compliance	5
Proactive Publication.....	5
Annex A: Delegation of Authority	6

Introduction

The *Access to Information Act* (ATIA) gives Canadian citizens, permanent residents and any person or corporation present in Canada the right to access corporate records of federal government institutions. Access to information, including corporate information, is a quasi-constitutional right in Canada. The ATIP process is fundamental in supporting an open and democratic society because it enhances the accountability and transparency of federal institutions and enables public debate on the conduct of those institutions.

This report, prepared and tabled in accordance with Section 94 of the ATIA, describes the Bank of Canada's access to information activities for 2024–25.

The Bank is not reporting on behalf of any wholly owned subsidiaries or non-operational institutions. Similarly, the Bank does not provide any services related to access to information to any other institution per section 96 of the ATIA.

Bank of Canada Mandate

The Bank of Canada is the nation's central bank. Our main role, as defined in the Bank of Canada Act, is “to promote the economic and financial welfare of Canada.”

The Bank has five core functions:

- ❖ **Monetary policy** – to keep inflation low, stable and predictable
- ❖ **Financial system** – to promote safe, sound and efficient financial systems within Canada and internationally
- ❖ **Currency** - to design, issue and distribute Canada's bank notes
- ❖ **Funds management** – to act as fiscal agent for the Government of Canada, advising on and implementing its public debt and foreign exchange reserve strategies
- ❖ **Retail payments supervision** – to supervise payment service providers, building confidence in the safety and reliability of their services and helping protect users from specific risks

Delegation and Organizational Structure

The Governor of the Bank of Canada, as the head of the institution, is responsible for the Bank's administration of the ATIP program under section 70(2) of the ATIA. As authorized by section 95(1), the Governor delegates this authority to the General Counsel and Corporate Secretary of the Bank, the Deputy Corporate Secretary and Senior Director Compliance (the Bank's Access to Information and Privacy Coordinator), and the ATIP Director.

A copy of the Bank's Delegation Order is available in [Annex A](#).

The Bank's Executive and Legal Services (ELS) Department is responsible for fulfilling the Bank's compliance obligations under the ATIA. The Privacy and Access Centre of Expertise (PACE), within ELS, is tasked with administering the Bank's Access to Information and Privacy (ATIP) program; it consists of 8 dedicated resources including policy specialists, analysts, leaders, and an administrator. The Bank uses the services of external consultants as required.

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 PACE.

The Bank has other channels through which information is made available to the public. If PACE receives a formal request for information that is typically available through other channels, PACE will coordinate a response to the requester through these other channels, as required.

Performance 2024-2025

The following section sets out some statistical highlights from the Bank's Statistical Report on ATIA.

Formal Requests

The Bank of Canada received 37 new formal access requests in 2024–25.

- ❖ In addition, 35 requests were carried forward from the previous reporting periods
 - 29 files from the 2023-24 reporting period.
 - 6 files from more than one reporting period. All 6 files were closed during this reporting period.
- ❖ Together, they represent a workload of 72 formal requests.
- ❖ 54 requests were completed representing a total output of 21,586 pages processed, including 8 requests which were ultimately abandoned by the requesters accounting for 4,940 of the total processed pages.
- ❖ Of the requests completed, records were fully disclosed for 6 requests and disclosed in part for 32 requests representing 14,412 pages processed. 7 files were closed, for which there were no existing records under the Bank's control. 1 file was closed with the records fully exempted, representing 2,234 pages processed.
- ❖ 27 were closed within legislated timelines representing a 50% completion rate for on-time requests. Information about number of days taken to process requests closed in 2024-25 can be found in section 4.1 of the statistical report.
- ❖ No audio or video records were processed for the requests completed this reporting period.
- ❖ 18 requests were carried over to 2025-2026 within and beyond the legislated timelines. Section 1.1 of the supplemental statistical report provides a detailed break-down of carry-over data.
- ❖ The Bank endeavors to respect deadlines and routinely keeps requesters informed of the status of their requests. Requests that are completed beyond the legislated timelines are typically more complex, broad in scope, involve a large volume of records, and require numerous internal and external consultations.

Informal Requests

The Bank received 2 informal requests during the 2024-25 reporting period.

- ❖ In addition, 5 informal requests were outstanding from previous reporting periods.
- ❖ Of the 7 active informal requests, 7 were closed during the reporting period.
- ❖ 0 informal requests were carried over to the 2025-26 reporting period.

Consultations

The Bank received 17 new requests for consultation in 2024-2025.

- ❖ 17 consultations originated from other federal institutions
- ❖ In addition, 12 consultations were carried forward from previous reporting periods and were closed this reporting period.
- ❖ Together, the 29 consultations amounted to 4605 pages for processing.
- ❖ 25 of 29 consultations were completed in 2024-25 totaling 3,965 processed pages.
- ❖ 4 consultation requests were carried over to the 2025-26 reporting period, with a total of 640 pages to review.

Extensions

In 2024–25, the Bank took 53 extensions in relation to the 54 completed formal access requests as broken down below:

- ❖ 38 were taken because meeting the original time limit of 30 days would unreasonably interfere with the institution's operations
- ❖ 14 involved consultations with other federal institutions
- ❖ 1 involved consultation with third parties

Complaints

The Bank received 8 formal notices of complaint from the Office of the Information Commissioner of Canada (OIC) under section 32 of the ATIA in 2024–25.

- ❖ The Bank continued to process 1 complaint that remained open from previous reporting periods for a total of 9 ongoing complaint files.
- ❖ In relation to 1 of the 9 complaints, the OIC issued 1 formal order under section 35 of the ATIA in 2024-2025, for which the Bank provided formal representations.
- ❖ Of the 9 ongoing complaints, 5 complaints were closed and 4 were carried over to the 2025-2026 reporting period.
- ❖ Of the closed complaints, 1 was well-founded, while in the case of 4 complaints the OIC ceased to investigate per section subsection 30(5) of the ATIA.

Parliamentary Returns

In addition to processing files in relation to the ATIA, PACE is also responsible for coordinating the Bank's responses to requests for information from the House of Commons and Senate, known as Parliamentary returns. The principles of the ATIP legislation must be considered in the processing of these responses. Providing this information represents a significant part of the annual workload for PACE.

The Bank received and responded to 44 Parliamentary questions and 0 Senate questions for a total of 44 questions in 2024–25, compared with 50 questions in 2023–24.

Notices of motions for the production of papers resemble written questions in that they are requests for information from the government. If adopted, these motions become a formal Order or Address to provide relevant records to Parliament.

The Bank received and responded to 3 Parliamentary motions in 2024–25, compared to 4 in the previous reporting period.

Training and Awareness Program

As employees of a federal institution, all Bank staff are responsible for upholding the principles of the ATIA and all staff need to be prepared to support the fulfillment of access to information requests during 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 2024-25, 330 employees completed the ATIP awareness module.

PACE also offers ad hoc virtual and in-person training and awareness sessions to Bank staff. These sessions focus on the administration of the ATIA, as well as best practices for managing corporate information. Staff can also request targeted sessions or more intensive workshops on any topic related to access to information. In 2024-25, PACE delivered 4 sessions to 80 participants focused on the principles and application of the ATIA. Senior Management were also briefed on key themes related to the Bank's ATIA operations.

The PACE HUB, an internally accessible site that provides proactive advice to employees tasked with assisting in the processing of requests, as well as general information about the ATIA of interest to all Bank employees, continues to support ATIA awareness at the Bank.

Institution Specific Policies, Guidelines and Procedures

As the access to information experts for the institution, PACE has a responsibility to ensure that access considerations are factored into decision-making processes at the Bank.

In 2024-25, PACE participated in various internal governance committees, providing input and timely feedback to key stakeholders about the Bank's information and data management governance policies and practices. This includes major Bank initiatives such as the adoption of artificial intelligence technology and reviews of the Bank's records retention and disposition activities.

Initiatives and Projects to Improve Access to Information

PACE strives to make the delivery of access to information services as seamless as possible and regularly reviews processes for improvements. Work continued on the multi-year ATIP modernization project, including updates to the case management system as well as the addition of several new modules which will streamline processes. Work will be completed in the next reporting period. In addition, processes for the retrieval of frequently requested records was streamlined.

To assist individuals with making an access to information request, 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.

Through participation in the Bank's Accessibility Working Committee, PACE is actively engaged in the Bank's efforts to promote and facilitate accessibility for its staff and those making requests for information. In addition, to make access to information more inclusive and facilitate culturally appropriate services for Indigenous requesters, PACE staff participated in a dedicated awareness discussion with the Bank's Senior Indigenous and Equity, Diversity and Inclusion Specialist, and supported the Bank's Indigenous hiring program.

PACE also closely monitors trends in incoming access to information requests to identify types of

information that are frequently requested and assesses the feasibility of making that information available by other means.

Monitoring Compliance

PACE 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.

Weekly meetings are held to discuss and closely monitor all active files and keep senior staff, such as the PACE Director, informed of operations. These meetings help the office to better manage heavy workloads and improve response times to external requesters and internal clients. The Bank aims to limit the number of consultations with other government institutions to the greatest extent possible by referring to similar information previously treated and relying on the subject matter expertise of Bank staff. When possible, the Bank will send a courtesy copy of records to be released to another government institution that may have an interest in Bank's treatment of information to be disclosed.

Senior management and the Board of Directors are briefed periodically on operational metrics and annually on the overall administration of the ATIP program.

Further, contracts with third parties clearly indicate that the Bank is subject to ATIP legislation and obliges these entities to support the Bank in the fulfilment of requests made under these statutes, as required. Further the agreements set out the requirements for the secure and appropriate management of Bank information and data by the third parties.

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 provide any individual or corporation present in Canada a right of access to information contained in records under the Bank's control. Staff are reminded of their responsibilities regarding the management of corporate information and are required to acknowledge their responsibilities and obligations under the ATIA as part of this annual exercise.

Proactive Publication

In the spirit of strengthening transparency and accountability across the public sector, and in accordance with the ATIA, the Bank proactively discloses the following information on its website:

- ❖ [information on travel and hospitality expenditures](#)
- ❖ [copies of reports tabled in Parliament](#)
- ❖ [contracts valued over \\$100,000](#)

In collaboration with relevant departments that retrieve information in relation to the Bank's proactive disclosure activities, Financial Services, Communications, and Executive and Legal Services departments also support the Bank to fulfill its proactive disclosure requirements. In 2024–25, all documents and reports that the Bank must proactively disclose (100%) were published within legislated timelines.

Annex A: Delegation of Authority



September 13, 2023

To: Steve Thomas
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 95(1) of the *Access to Information Act* and section 73(1) of the *Privacy 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 regulations	Privacy 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	As set out in Appendix A	As set out in Appendix B


Governor Tiff Macklem

Oct 31, 2023
(Date)

Appendix A (Responsibility Delegated to Director ATIP — Access to Information Act)

Sections	Description
7	Respond to request for access within 30 days; give access or give notice
8	Transfer a request to the government institution with greater interest; give written notice of the transfer to the applicant
9	Extend time limits for responding to request and give notice to Information Commissioner of extension of over 30 days
10	Issue notice where access refused- the record does not exist, or where the institution does not indicate if the records exists or not the specific provisions for refusal if the record existed
11	Administer the collection of fees or waive fees
12(2)(b)	Decide whether to translate requested record(s)
12(3)(b)	Convert record(s) in an alternative format, when necessary and reasonable
13(1)	Shall refuse to disclose any record obtained in confidence from another government
13(2)	May disclose any record referred to in 13(1) if the other government consents to the disclosure or makes the information public
14	May refuse to disclose any record if reasonably injurious to the conduct of Federal-Provincial affairs
15	May refuse to disclose any record if reasonably injurious to international affairs and defence or the detection, prevention, or suppression of subversive or hostile activities
16	May refuse to disclose any record pertaining to law enforcement and investigations, to information that could reasonably be expected to facilitate the commission of an offence, to confidential information on policing services for provinces or municipalities
17	May refuse to disclose any record that could reasonably threaten the safety of individuals
18	May refuse to disclose any record that could reasonably be expected to be materially injurious to the economic interests of Canada
19(1)	Shall refuse to disclose any record that contains personal information as defined in section 3 of the <i>Privacy Act</i>
19(2)	May disclose personal information if: the individual consents; the information is publicly available; disclosure is in accordance with section 8 of the <i>Privacy Act</i>
20	Shall refuse to disclose any record that contains third party information
21	May refuse to disclose any record that contains information related to the operations of government: advice/recommendations; consultations/deliberations; plans for negotiations; plans related to management of personnel
22	May refuse to disclose any record that contains information relating to testing or auditing procedures
23	May refuse to disclose any record that contains information subject to solicitor-client privilege
24	Shall refuse to disclose any record that is subject to statutory prohibitions as set out in Schedule II
25	Shall sever any information that can be disclosed
26	May refuse to disclose any record on reasonable grounds that such material is to be published within a 90-day period or longer
27(4)	May extend the time limit for third party notification
28(4)	Disclose a record pertaining to Third Party following 20 days from the notice having been issued to a third party of the decision to disclose, unless the third party requests a review of the decision as per section 44
68	Deny any record that is excluded in the Act, including published material or material available for purchase by the public
69	Deny any record that is excluded in the Act that constitute confidences of the Queen's Privy Council for Canada

Appendix B (Responsibility Delegated to Director ATIP — *Privacy Act*)

Sections	Description
8(2)(a)-(l)	Disclose personal information on the basis of the requirements of subsection 8(2)
8(4)	Retain a record of any disclosure made under 8(2)(e)
9(1)	Retain records of use of personal information
9(4)	Notify the Privacy Commissioner of consistent use of personal information and update index accordingly
10	Include personal information in personal information banks
14	Respond to request for access within 30 days; give access or give notice
15	Extend time limit for responding to request for access
16	Issue notice where access refused
17	Form of Access/Language of Access/Alternative format
19(1)	Shall refuse to disclose information obtained in confidence from another government or organization
19(2)	May disclose any information referred to in 19(1) if the other government or organization consents to the disclosure or makes the information public
20	May refuse to disclose information if injurious to the conduct of Federal-Provincial affairs
21	May refuse to disclose if injurious to international affairs and defence or preventing or suppressing subversive or hostile activities
22	May refuse to disclose information prepared by an investigative body, information injurious to the enforcement of a law, or information injurious to the security or penal institutions
23	May refuse to disclose information prepared by an investigative body for security clearances
25	May refuse to disclose information which could reasonably threaten the safety of individuals
26	May refuse to disclose information about another individual, and shall refuse to disclose such information where disclosure is prohibited under section 8
27	May refuse to disclose information subject to solicitor-client privilege
28	May refuse to disclose information relating to the individual's physical or mental health where disclosure contrary to the best interest of the individual
69	Deny any record that is excluded in the Act, including library or museum material preserved solely for public reference or exhibition purposes
70	Deny any record that is excluded in the Act that constitute confidences of the Queen's Privy Council for Canada

Reference

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.

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.