



Western Economic  
Diversification Canada

Diversification de l'économie  
de l'Ouest Canada

## ***Privacy Act***

**Western Economic Diversification Canada  
Annual Report to Parliament  
April 1, 2008 – March 31, 2009**



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The *Privacy Act* (Revised Statutes of Canada, Chapter P-21, 1985) came into force on July 1, 1983.

The purpose of this *Act* is to extend the present laws of Canada that protect the privacy of individuals and provide individuals with a right of access to personal information about themselves.

The *Privacy Act* protects the privacy of individuals by denying third parties access to personal information relating to them and enabling them to exercise strict control over the collection, disclosure and use of such information.

Western Economic Diversification Canada (WD) is fully committed to both the spirit and the intent of the *Privacy Act*, which are based on the principles of open government and to ensure the privacy of individuals with respect to their personal information held by the department.

This report summarizes the activities of WD in implementing the *Privacy Act*, and fulfils the requirement under Section 72, which stipulates that, "The head of every government institution shall prepare for submission to Parliament an annual report on the administration of this Act within the institution during each financial year."

Additional copies of this report may be obtained from:

Access to Information and Privacy Coordinator  
Western Economic Diversification Canada  
Suite 1500, Canada Place  
9700 Jasper Avenue N.W.  
Edmonton, Alberta T5J 4H7

Once tabled in the House of Commons and the Senate, WD will also post this report on its public website at: <http://www.wd-deo.gc.ca/eng/59.asp>.

## Mandate

Western Economic Diversification Canada (WD) was established in 1987 to help lessen Western Canada's (British Columbia, Alberta, Saskatchewan and Manitoba) strong economic dependence on natural resources. Under the *Western Economic Diversification Act, 1988*, the Department is mandated to "...promote the development and diversification of the economy of Western Canada and to advance the interests of Western Canada in national economic policy, program and project development, and implementation."

Since 1987, WD has worked on behalf of western Canadians to ensure the long-term development and diversification of a dynamic regional economy. Western Canada's rich and diverse natural heritage, coupled with a growing innovation and entrepreneurial culture, contributes to the region's economic stability and prosperity.

In order to achieve its mandate, WD continues to work to help address the challenges faced by western communities and business. The Department's role of supporting economic diversification and investing in innovation and economic development will help to effectively bridge the gap between economic downturn and a sound economic future.

The Department organizes its programs and services to effectively pursue its mandate through the following Strategic Outcomes:

- The western Canadian economy is competitive, expanded and diversified (Entrepreneurship and Innovation);
- Communities in Western Canada are economically viable (Community Economic Development); and
- Policies and programs that strengthen the western Canadian economy (Policy, Advocacy and Coordination).

WD's strategic investments in these areas will help to fulfill WD's vision to be a leader in creating a more diversified western Canadian economy that has strong, competitive and innovative businesses and communities.

### ***2008-2009 Privacy Highlights and Accomplishments***

The number of Privacy requests received by WD in 2008-2009 increased over the previous fiscal year, from 0 to 2. The Department, however, has not historically received many Privacy requests. The department did not receive any privacy complaints, was not subject to any investigations, and there were no appeals or applications submitted to the Federal Courts.

Specific highlights for WD in 2008-2009 include:

- The Department's Executive Committee approved a new Privacy Protection Policy in November 2008.
- A new Privacy Protection Procedures Manual was developed and copies provided to Regional ATIP Liaison Officers, and made available to all staff on WD's internal website.
- Privacy awareness sessions were conducted in all regional offices, with approximately two-thirds of all staff attending.
- WD recognized Data Protection Day on January 28, 2009, with staff messages and "Think before you bin it!" posters placed throughout all WD offices. WD continued to focus on individual responsibility for security and protecting and handling information during Security Awareness Week, and built on the theme established on Data Protection Day by noting that Canadians expect that the information that we collect, create and handle, is treated with the utmost care and respect.

For the purposes of the *Privacy Act*, the Environment Minister, and senior minister responsible for Western Economic Diversification, has delegated his powers, authorities and has delegated his powers, authorities and responsibilities to the Executive Director, Finance and Corporate Management (ATIP Coordinator) and Manager, Corporate Administration (Deputy ATIP Coordinator), who are accountable for the development, coordination and implementation of effective policies, guidelines, systems and procedures to ensure the Minister's responsibilities under the *Act* are met and to enable appropriate processing and proper disclosure of information. The Coordinator is also responsible for related policies, systems and procedures emanating from the *Act*.

One full-time ATIP Officer in the Corporate Administration unit assists the Coordinator, and his Deputy, with the Access to Information and Privacy function in WD. An ATIP consultant provides additional support as required. Regional ATIP Liaison Officers (RALOs) are located in each regional office in B.C., Alberta, Saskatchewan and Manitoba, as well as the Ottawa Liaison Office and within WD's Headquarters. The RALOs are the regional contacts when retrieving records responding to ATIP requests, and providing liaison between the ATIP unit and regional staff concerning enquiries.

The activities of WD's Access to Information and Privacy (ATIP) unit include:

- processing requests in accordance with the *Act*;
- responding to consultations submitted by other federal institutions on WD records being considered for release;
- developing and maintaining policies, procedures and guidelines to ensure the *Act* is respected by departmental staff;
- promoting awareness of the *Act* within the Department to ensure staff are aware of the obligations imposed by the legislation;
- preparing statistical and annual reports to Parliament and other statutory reporting requirements, such as Info Source, as well as other material that may be required by central agencies;
- representing WD in dealings with the Treasury Board of Canada Secretariat, the Privacy Commissioner of Canada and other government departments and agencies regarding the application of the *Act* as it relates to WD;
- monitoring departmental compliance with the *Act*, regulations and relevant procedures and policies; and
- providing ongoing advice and guidance to senior management and department staff on information management and Privacy legislation.

In January 2009, a new ATIP Coordinator was appointed internally for the Department following a reorganization of Headquarters. The new Delegation Order formalized the delegation to the Executive Director, Finance and Corporate Management, and includes the delegation of these duties also to the Manager, Corporate Administration, who supports the Coordinator as the Deputy ATIP Coordinator.

### ***Departmental Policies and Procedures***

WD's Executive Committee adopted a new Privacy Protection Policy on November 19, 2008 (see Appendix A). This Policy is based on the *Privacy Act*, its Regulations and the principles of open government from which it is derived, and is supported by the Privacy Protection Procedures Manual.

Subsequently, in November 2008, the internal ATIP Procedures Manual was reviewed, and separate manuals developed for Access to Information and Privacy. The Privacy Protection Procedures Manual was updated to ensure that it reflects the current departmental processes, as well as ensures all changes made to the legislation are incorporated as appropriate. The new manual was provided to the RALOs in March 2009 for their use, and the manual is available to all WD staff on the WNet internal website (see Appendix C). This manual will be reviewed a minimum of once per fiscal year to ensure that it is up-to-date, and includes any changes in policies or procedures are incorporated.

## ***Info Source***

In January 2008, WD's Executive Committee approved the formation of an Info Source Steering Committee. The goal of the committee was to assist the Department in improving its management accountability as required in the various reporting requirements of the Management Accountability Framework, Area of Management #12 – Effectiveness of Information Management, which reviews and evaluates the department's performance and Info Source reporting requirements. As a result of the efforts of this committee, and considerable effort by the ATIP Officer, WD greatly improved its Info Source listing for the "Sources of Government Information" publication. WD worked closely with its TBS Analyst to make improvements to its listing and this assistance was greatly appreciated.

A new class of personal information for Public Opinion Research was added in 2008, and TBS also approved eight (8) new Standard Personal Information Banks (PIBs) for the Department.

In response to the Round V MAF assessment, WD created and submitted four new PIBs to Treasury Board of Canada Secretariat (TBS) in 2008-2009. All of these have subsequently been withdrawn at the request of TBS officials, as a new Standard PIB has been or will be created.

The Treasury Board Portfolio (TBP) Round VI assessment released in May 2009 rated WD as "Acceptable" under Line of Evidence 12.3. TBP identified that WD may require institution-specific Personal Information Banks and/or Classes of Personal Information for: Client Satisfaction Surveys; Economic Research and Market Studies – support to research projects and initiatives (applications for research funding); and Funding Request Proposals.

- Client Satisfaction Surveys – WD has consulted with the TBS Privacy Policy unit and has been advised that the Standard Public Communications PIB is being revised to include client satisfaction surveys and public opinion research. WD is already registered for this PIB. The Department also reviewed its existing Class of Personal Information for public opinion research and believes that client satisfaction surveys fall within its purview; however, improvements will be incorporated into the existing information to ensure this aspect is clearly included.
- Economic Research and Market Studies – WD conduct of research and market studies have been established through either professional services contracts (WED-PSU-912) or through the Department's grants and contributions programs. WD was asked to withdraw its institution-specific PIB on March 25, 2009, by TBS officials as a new Standard PIB is being created which the Department can register for at that time. The Department will not establish a Class of Personal Information for this area, as the personal information could be easily obtained through contract or project records.
- Funding Request Proposals – As noted above, WD was asked to withdraw its institution-specific Grants and Contributions PIB on March 25, 2009, by TBS officials as a new Standard PIB is being created which the Department can register for at that time. This PIB covered funding request proposals received by the Department. The Department will not establish a Class of Personal Information for this area, as the personal information could be easily obtained through project records or institutional project databases.

Not noted in the assessment, was that TBS identified WD's 2007-2008 Annual Report to Parliament as a best practice in government, and this was shared with other departments.

## ***Privacy Training and Awareness***

**WD Staff Training:** Privacy and Access to Information awareness sessions were conducted for staff in all WD offices in the 2008-2009 fiscal year, with approximately two-thirds of all staff attending. The Privacy portion of these sessions provided staff with an overview of the *Privacy Act*, information about what is personal information and how do you protect it, data matching, and Privacy Impact Assessments.

Attendees at the sessions for the most part, however, did not include many of the Department's management cadre or other key officials who would benefit from training in this field. WD will look at more specific privacy-related training and/or management-specific training sessions in the future.



Location	Date	Number of Sessions	# of Attendees
Winnipeg	September 3	1	24
Vancouver	September 17	2	52
Saskatoon	October 1	2	38
Ottawa	November 18	1 - French	1
	November 19	1 - English	9
Edmonton	November 26	1 – Alberta Region	30
		1 – Headquarters	27
Calgary	January 13	1	9
<b>TOTALS</b>		<b>10</b>	<b>190</b>

The ATIP Coordinator, Deputy ATIP Coordinator and ATIP Officer also provide advice on privacy issues to RALOs and department staff on a regular basis to increase awareness of the *Act*, as well as provide guidance on how the department processes privacy requests, and the rationale required to apply the exemptions and exclusions, where appropriate.

**ATIP Staff Training:** The ATIP Officer attended the national Canadian Access and Privacy Association Conference held in Ottawa, Ontario, and a TBS ATIP Community Meeting, in November 2008.

The Deputy ATIP Coordinator meet with WD's ATIP consultant for a one-day training session in September 2008 on the roles and responsibilities of an ATIP Coordinator.

**Privacy Awareness Events:** WD recognized Data Protection Day on January 28, 2009, with staff messages and "Think before you bin it!" posters placed throughout all WD offices (see Appendix D). The Department plans to make this an annual privacy awareness event.

In addition, WD continued to focus on individual responsibility for security and protecting and handling information during Security Awareness Week, and built on the theme established on Data Protection Day by noting that Canadians expect that the information that we collect, create and handle, is treated with the utmost care and respect.

***Access to Information Act and Privacy Act Delegation Order***

***Arrêté sur la délégation en vertu de la  
Loi sur l'accès à l'information et de la Loi sur la protection des renseignements personnels***

The Minister of the Environment, and senior minister responsible for Western Economic Diversification, pursuant to section 73 of the *Access to Information Act* and the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the person occupying on an acting basis the position, to exercise the powers and functions of the Minister as the head of a government institution, under the section of the Act set out in the schedule opposite each position. This Delegation Order supersedes all previous Delegation Orders.

En vertu de l'article 73 de la *Loi sur l'accès à l'information* et la *Loi sur la protection des renseignements personnels*, le ministre de l'Environnement, et ministre principal responsable de la Diversification de l'économie de l'Ouest canadien, délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'à la personne occupant à titre intérimaire lesdits postes, les attributions dont il est, en qualité de responsable d'une institution fédérale, investie par les articles des *Lois* mentionnées en regard de chaque poste. Le présent décret de délégation remplace et annule tout décret antérieur.

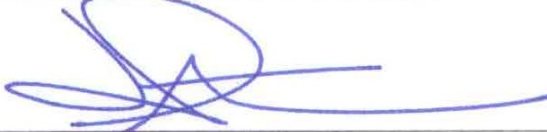
**Schedule / Annexe**

Position / Poste	<i>Access to Information Act</i> and Regulations / <i>Loi sur l'accès à l'information</i> et règlements	<i>Privacy Act</i> and Regulations / <i>Loi sur la protection des renseignements personnels</i> et règlements
Executive Director, Finance and Corporate Management / Directeur exécutif, Finances et Gestion ministérielle	Full authority / Autorité absolue	Full authority / Autorité absolue
Manager, Corporate Administration / Gestionnaire, Administration intégrée	Full authority / Autorité absolue	Full authority / Autorité absolue

Dated, at the City of Ottawa  
this 12 day of August, 2009

Daté, en la ville d'Ottawa  
ce 12 jour de août 2009

THE HONOURABLE JIM PRENTICE  
MINISTER OF THE ENVIRONMENT



L'HONORABLE JIM PRENTICE  
MINISTRE DE L'ENVIRONNEMENT

<b>Delegation of powers, duties and functions delegated pursuant to section 73 of the Privacy Act Western Economic Diversification Canada</b>			
<b>Section</b>	<b>Description</b>	<b>Executive Director, Finance and Corporate Management</b>	<b>Manager, Corporate Administration</b>
8(2)(j)	Disclosure for research purposes	X	X
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X	X
8(4)	Copies of requests under 8(2)(e) to be retained	X	X
8(5)	Notice of disclosure under 8(2)(m)	X	X
9(1)	Records of disclosures to be retained	X	X
9(4)	Consistent uses	X	X
10	Personal information to be included in personal information banks	X	X
14	Notice where access requested	X	X
15	Extension of time limits	X	X
17(2)(b)	Language of access	X	X
17(3)(b)	Access to personal information in alternative format	X	X
18(2)	Exemption (exempt bank) – Disclosure may be refused	X	X
19(1)	Exemption – Personal information obtained in confidence	X	X
19(2)	Exemption -- Where authorized to disclose	X	X
20	Exemption – Federal-provincial affairs	X	X
21	Exemption – International affairs and defence	X	X
22	Exemption – Law enforcement and investigations	X	X
22.3	Exemption – <i>Public Servants Disclosure Protection Act</i>	X	X
23	Exemption – Security clearances	X	X
24	Exemption – Individuals sentenced for an offence	X	X
25	Exemption – Safety of individuals	X	X
26	Exemption – Information about another individual	X	X
27	Exemption – Solicitor-client privilege	X	X
28	Exemption – Medical record	X	X
33(2)	Right to make representation	X	X
35(1)	Findings and recommendations of Privacy Commissioner (complaints)	X	X
35(4)	Access to be given	X	X
36(3)	Report of findings and recommendations (exempt banks)	X	X
37(3)	Report of findings and recommendations (compliance review)	X	X
51(2)(b)	Special rules for hearings	X	X
51(3)	<i>Ex parte</i> representations	X	X
70	Denial of access – Cabinet confidences	X	X
72(1)	Report to Parliament	X	X
77	Responsibilities conferred on the head of the institution by the Regulations made under section 77 which are not included above	X	X

Delegation of powers, duties and functions delegated pursuant to section 73 of the Privacy Regulations			
Section	Description	Executive Director, Finance and Corporate Management	Manager, Corporate Administration
9	Reasonable facilities and time provided to examine personal information	X	X
11(2)	Notification that correction to personal information has been made	X	X
11(4)	Notification that correction to personal information has been refused	X	X
13(1)	Disclosure of personal information relating to physical and mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requestor	X	X
14	Disclosure of personal information relating to physical or mental health may be made to a requestor in the presence of a qualified medical practitioner or psychologist	X	X

# 2008-2009 Statistical Report on the *Privacy Act*



Government of Canada  
Gouvernement du Canada

## REPORT ON THE PRIVACY ACT RAPPORT CONCERNANT LA LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

Institution	WESTERN ECONOMIC DIVERSIFICATION CANADA DIVERSIFICATION DE L'ÉCONOMIE DE L'OUEST CANADA	Reporting period / Période visée par le rapport 4/1/2008 to/à 3/31/2009
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I Requests under the Privacy Act / Demandes en vertu de la Loi sur la protection des renseignements personnels	
Received during reporting period / Reçues pendant la période visée par le rapport	2
Outstanding from previous period / En suspens depuis la période antérieure	0
<b>TOTAL</b>	<b>2</b>
Completed during reporting period / Traitées pendant la période visée par le rapport	2
Carried forward / Reportées	0

II Disposition of request completed / Disposition à l'égard des demandes traitées	
1. All disclosed / Communication totale	0
2. Disclosed in part / Communication partielle	1
3. Nothing disclosed (excluded) / Aucune communication (exclusion)	0
4. Nothing disclosed (exempt) / Aucune communication (exemption)	0
5. Unable to process / Traitement impossible	1
6. Abandoned by applicant / Abandon de la demande	0
7. Transferred / Transmission	0
<b>TOTAL</b>	<b>2</b>

III Exemptions invoked / Exceptions invoquées	
S. Art. 18(2)	0
S. Art. 19(1)(a)	0
(b)	0
(c)	0
(d)	0
S. Art. 20	0
S. Art. 21	0
S. Art. 22(1)(a)	0
(b)	0
(c)	0
S. Art. 22(2)	0
S. Art. 23 (a)	0
(b)	0
S. Art. 24	0
S. Art. 25	1
S. Art. 26	1
S. Art. 27	0
S. Art. 28	0

TBS/SCT 350-63 (Rev. 1999/03)

IV Exclusions cited / Exclusions citées	
S. Art. 69(1)(a)	0
(b)	0
S. Art. 70(1)(a)	0
(b)	0
(c)	0
(d)	0
(e)	0
(f)	0

V Completion time / Délai de traitement	
30 days or under / 30 jours ou moins	1
31 to 60 days / De 31 à 60 jours	1
61 to 120 days / De 61 à 120 jours	0
121 days or over / 121 jours ou plus	0

VI Extensions / Prorogations des délais		
	30 days or under / 30 jours ou moins	31 days or over / 31 jours ou plus
Interference with operations / Interruption des opérations	0	0
Consultation	0	
Translation / Traduction	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>

VII Translations / Traductions		
Translations requested / Traductions demandées		0
Translations prepared / Traductions préparées	English to French / De l'anglais au français	0
	French to English / Du français à l'anglais	0

VIII Method of access / Méthode de consultation	
Copies given / Copies de l'original	1
Examination / Examen de l'original	0
Copies and examination / Copies et examen	0

IX Corrections and notation / Corrections et mention	
Corrections requested / Corrections demandées	0
Corrections made / Corrections effectuées	0
Notation attached / Mention annexée	0

X Costs / Coûts	
Financial (all reasons) / Financiers (raisons)	
Salary / Traitements	\$ \$19,438
Administration (O and M) / Administration (fonctionnement et maintien)	\$ \$9,020
<b>TOTAL</b>	<b>\$ \$28,458</b>
Person year utilization (all reasons) / Années-personnes utilisées (raisons)	
Person year (decimal format) / Années-personnes (nombre décimal)	0.15



**Supplemental Reporting  
Requirements  
*Privacy Act***

Treasury Board Secretariat is monitoring compliance with the Privacy Impact Assessment (PIA) Policy (which came into effect on May 2, 2002) through a variety of means. Institutions are therefore required to report the following information for this reporting period.

**Indicate the number of:**

Preliminary Privacy Impact Assessments initiated: 0

Preliminary Privacy Impact Assessments completed: 0

Privacy Impact Assessments initiated: 0

Privacy Impact Assessments completed: 0

Privacy Impact Assessments forwarded to the Office of the Privacy Commissioner (OPC): 0

If your institution did not undertake any of the activities noted above during the reporting period, this must be stated explicitly.

**Exigences en matière  
d'établissement de rapports  
supplémentaire  
*Loi sur la protection des  
renseignements personnels***

Le Secrétariat du Conseil du Trésor surveille la conformité à la Politique sur l'Évaluation des facteurs relatifs à la vie privée (ÉFVP) (qui est entrée en vigueur le 2 mai 2002) par divers moyens. Les institutions sont donc tenues de déclarer les renseignements suivants pour cette période de déclaration.

**Veillez indiquer le nombre :**

d'évaluations préliminaires des facteurs relatifs à la vie privée amorcées : 0

d'évaluations préliminaires des facteurs relatifs à la vie privée achevées : 0

d'évaluations des facteurs relatifs à la vie privée amorcées : 0

d'évaluations des facteurs relatifs à la vie privée achevées : 0

d'évaluations des facteurs relatifs à la vie privée acheminées au Commissariat à la protection de la vie privée (CPVP) : 0

Si votre institution n'a pas entrepris l'une ou l'autre des activités susmentionnées durant la période de rapport, cela doit être mentionné de façon explicite.

## Interpretation of the Statistical Report

### a) Requests Received Under the *Privacy Act*

Between April 1, 2008, and March 31, 2009, WD received two requests for personal information under the *Privacy Act*. Both requests were completed during the reporting period – one within the initial 30-day period, and one within 31-60 days.

Both requests were from a WD employee. The individual had difficulty identifying whether information should be requested the *Privacy Act* or the *Access to Information Act* despite efforts to explain this. One request was disclosed in part, and there were no records found which meet the requirements of the second request, as it was the personal information of individuals other than the applicant.

### b) Exemptions Invoked

Sections 25 and 26 were invoked to protect information pertaining to the personal information of individuals other than the requestor on one occasion. All other information was released in its entirety.

### c) Permissible Disclosure of Personal Information

Personal information collected by WD in the course of its programs and activities is being disclosed only for the purpose for which it was collected in accordance with paragraph 8(2)(a) of the *Privacy Act*. During 2008-2009, WD did not disclose personal information for any other purposes as outlined in paragraphs 8(2)(e), (f) or (m).

### d) Operational Costs to Administer the *Act*

Total salary costs associated with the *Privacy Act* are estimated at \$19,438 for 2008-2009. Other costs amounted to \$9,020, for a total of \$28,458, in comparison to only a total of \$2,500 estimated in 2007-2008.

This substantial increase in costs can be attributed to the nature of the requests received, other activities pertaining to internal privacy issues, work on Info Source requirements and staff training-related expenses.

Associated employee resources for 2008-2009 are fixed at 15% of one full-time equivalent (FTE) for administering the *Act*.

## Privacy Impact Assessments

In 2002, Treasury Board issued a policy that requires federal government institutions subject to the *Privacy Act* to conduct Privacy Impact Assessments (PIA) before establishing new programs, systems or policies, or before making any substantial modifications to an existing program, system or policy.

During this reporting period, WD did not initiate any Privacy Impact Assessments (PIA) and, therefore, no assessments were forwarded to the Office of the Privacy Commissioner.

In November 2008, the ATIP Officer met with TBS officials to discuss PIAs and to ensure that the Department met its requirements in this regard. Although new funding programs have been developed or managed on behalf of other government departments (such as various Infrastructure and community economic adjustment programs), the TBS official confirmed that PIAs were required when only new personal information was being collected by the Department.

Efforts are ongoing to ensure that privacy concerns are addressed when new programs and activities are being discussed in the Department.

To date, WD has not posted PPIA summaries on its institutional website.

### ***Data Matching and Sharing Activities***

WD did not establish any new systems or processes that led to data matching or sharing of personal information, either within the Department or any external sources.

The ATIP unit continues to review business processes as they are alerted to them and procedures established to track data matching activities that may occur in the Department or with external sources will be developed in the future.



## **Privacy Protection Policy**



# Privacy Protection Policy

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## 1.0 Policy Objective

Western Economic Diversification Canada (WD) is fully committed to both the spirit and the intent of the *Privacy Act*, which are based on the principles of open government and to ensure the privacy of individuals with respect to their personal information held by the Department. Therefore, WD's Privacy Protection Policy ensures that the Department effectively and consistently administers its responsibilities in accordance with the *Privacy Act* and its Regulations.

## 2.0 Policy Statement

This Policy is based on the *Privacy Act* and the principles of open government from which it is derived. Specifically, the objectives are to:

- facilitate statutory and regulatory compliance, and enhance effective application of the *Privacy Act* and its Regulations by WD;
- ensure consistency in practices and procedures in administering the *Act* and Regulations so that applicants receive assistance in filing requests for access to personal information; and
- ensure effective protection and management of personal information by identifying, assessing, monitoring and mitigating privacy risks in government programs and activities involving the collection, retention, use, disclosure and disposal of personal information.

The expected results of this Policy are:

- sound management and decisions with respect to the handling and protection of personal information, including identifying numbers;
- clear responsibilities in WD for decision-making and managing the operation of the *Privacy Act* and its Regulations, including complete, accurate and timely responses to Canadians and individuals who are present in Canada and who exercise their right to access to, and correction of, their personal information under the control of the Department;
- consistent public reporting on the administration of the *Act* through WD's Annual Report to Parliament, statistical report and the annual publication of Info Source chapters, which are produced by the Treasury Board of Canada Secretariat (TBS); and
- identification, assessment and mitigation of privacy impacts and risks for all new or modified programs and activities that involve the use of personal information.

## 3.0 Policy Requirements

The TBS Policy on Privacy Protection (April 1, 2008), specifically Section 6 – Policy Requirements, provides guidance as follows which WD has adopted:

- **Delegation:** The head of the Department (the Minister) is responsible for deciding whether to delegate any of his/her powers, duties and functions under the *Act*. When the decision is made to delegate responsibilities, WD must have in place a current Delegation Order, signed by the Minister, authorizing which responsibilities may be carried out by particular officials. The powers, duties and functions that may be delegated appear in Appendix B of the TBS Policy.
- **Privacy Awareness:** WD is responsible for making its employees aware of the policies, procedures and legal responsibilities of the *Act*.

- **Protecting the Identity of Applicants:** WD shall ensure that applicants' identities are protected and only disclosed when authorized by virtue of the *Act*, and where there is a clear need to know in order to perform duties and functions related to the *Act*.
- **Processing Privacy Requests:** WD shall establish effective procedures and systems to respond to privacy requests, that include:
  - directing departmental employees to provide accurate, timely and complete responses to requests made under the *Act*;
  - implementing written procedures and practices to ensure every reasonable effect is made to help requestors receive complete, accurate and timely responses;
  - establishing effective process and systems to respond to requests for access to, and correction of, personal information and to document deliberations and decisions made concerning requests received under the *Act*; and
  - establishing procedures that ensure personal information is reviewed to determine if it is subject to the *Act*, whether exemptions apply and conduct necessary consultations pursuant to the *Act* are undertaken.
- **Cabinet Confidences:** WD shall follow established procedures concerning consultations with the Privy Council Office prior to excluding Cabinet Confidences.
- **Contracts and Agreements:** WD shall establish measures, when personal information is involved, to ensure that it meets the requirements of the *Act* when contracting with private sector organizations or when entering into agreements or arrangements with public sector institutions.
- **Notifying the Privacy Commissioner:** WD shall notify the Privacy Commissioner of any planned initiatives (legislation, regulations, policies or programs) that could relate to the *Act* or to any of its provisions, or that may have an impact on the privacy of Canadians at the early stage of development to permit the Commissioner to review and discuss the issues involved.
- **Use of the Social Insurance Number:** WD shall ensure compliance with the specific terms and conditions related to the use of Social Insurance Numbers and the specific restrictions with regard to its collection, use and disclosure.
- **Privacy Impact Assessments (PIAs):** WD shall ensure that, when applicable, privacy impact assessments and multi-institutional PIAs are developed, maintained and published on the Department's public website.
- **Privacy Protocol for Non-Administrative Purposes:** WD shall establish a privacy protocol for the collection, use or disclosure of personal information for non-administrative purposes, including research, statistical, and audit and evaluation purposes.
- **Exempt Banks:** WD shall consult with TBS on any proposal for the establishment or revocation of an exempt bank, and submit specific requests to the President of the Treasury Board with regard to the proposal.
- **Monitoring and Reporting Requirements:** The ATIP Coordinator is responsible for monitoring compliance of the Policy as it relates to the *Act*, and ensuring that:
  - an Annual Report to Parliament is prepared and tabled in each House of Parliament;
  - an annual statistical report on the administration of the *Act* is submitted to TBS;
  - new or modified Personal Information Bank (PIB) descriptions are prepared and registered with TBS; and
  - the Department's Info Source chapter is updated at a minimum annually, including proposed new or modified PIBs.

## 4.0 Departmental Procedures

WD has developed a Privacy Protection Procedures Manual for the use of WD staff administering the legislation and provides a balanced approach to explaining how the legislation permits both the release and denial of personal information that has been requested.

In addition, the Manual addresses additional mandatory privacy-related requirements pertaining to privacy impact assessments, data matching, the Social Insurance Number, and the creation and registration of personal information banks (PIBs).

The manual serves as a reference manual and tool for Regional ATIP Liaison Officers and staff, with the objective to help WD staff better understand the implications of the *Privacy Act* and to build a network within WD to ensure top quality responses to requests for information.

## 5.0 Authorities

The *Privacy Act* is supported by a number of regulatory, policy and procedural instruments that reinforce certain provisions of the *Act*, as well as provide interpretation and practical guidance of specific sections. These documents include:

### 5.1 Department of Justice Canada

- Access to Information Act: <http://laws.justice.gc.ca/en/A-1/8.html>
- Access to Information Regulations: <http://laws.justice.gc.ca/en/A-1/SOR-83-507/45.html>
- Library and Archives of Canada Act:  
<http://laws.justice.gc.ca/en/showdoc/cs/L-7.7//20081010/en>
- Privacy Act: <http://laws.justice.gc.ca/en/P-21/index.html>
- Privacy Regulations: <http://laws.justice.gc.ca/en/showtdm/cr/SOR-83-508>
- Privacy Act Heads of Government Institutions Designation Order:  
<http://laws.justice.gc.ca/en/showtdm/cr/SI-83-114>

### 5.2 Treasury Board of Canada Secretariat

- Access to Information – Policies and Guidelines:  
[http://publiservice.tbs-sct.gc.ca/pubs\\_pol/gospubs/tbm\\_121/siglist\\_e.asp](http://publiservice.tbs-sct.gc.ca/pubs_pol/gospubs/tbm_121/siglist_e.asp)
- Communications Policy of the Government of Canada:  
[http://publiservice.tbs-sct.gc.ca/pubs\\_pol/sipubs/comm/comm\\_e.asp](http://publiservice.tbs-sct.gc.ca/pubs_pol/sipubs/comm/comm_e.asp)
- Employee Privacy Code:  
[http://www.tbs-sct.gc.ca/pubs\\_pol/gospubs/TBM\\_128/CHAP3\\_3-eng.asp](http://www.tbs-sct.gc.ca/pubs_pol/gospubs/TBM_128/CHAP3_3-eng.asp)
- Government Security Policy:  
[http://www.tbs-sct.gc.ca/pubs\\_pol/gospubs/tbm\\_12a/gsp-psg\\_e.asp](http://www.tbs-sct.gc.ca/pubs_pol/gospubs/tbm_12a/gsp-psg_e.asp)
- Management of Government Information – Policies and Procedures:  
[http://www.tbs-sct.gc.ca/pubs\\_pol/ciopubs/TB\\_GIH/siglist-eng.asp](http://www.tbs-sct.gc.ca/pubs_pol/ciopubs/TB_GIH/siglist-eng.asp)
- Policy on Prevention and Resolution of Harassment in the Workplace:  
<http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=12414>
- Policy on Privacy Protection:  
<http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?evttoo=X&id=12510&section=text>
- Privacy Impact Assessment Policy:  
<http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=12450>

### 5.3 Western Economic Diversification Canada

- Privacy Protection Procedures Manual

In the event of a discrepancy, the *Privacy Act* and its Regulations, Orders in Council, the Minister's Delegation of Authority, directives and official Treasury Board policies shall take precedence over this Policy and WD's procedures.

## **6.0 Date of Application**

This Policy was adopted at a Management Accountability Committee meeting of Western Economic Diversification Canada on November 19, 2008, as part of its Policy Suite. This Policy shall apply to all programs and services of the Department.

### **6.1 Policy Change Control**

<b>Revision Number</b>	<b>Date Issued</b>	<b>Author</b>	<b>Brief Description of Change</b>
V1.0	November 19, 2008	Barb Steele ATIP Officer	New policy based on the April 2008 TBS Privacy Protection Policy.

## WD Public Web Site Information

Access to Information and Privacy

Page 1 of 1



Western Economic  
Diversification Canada

Diversification de l'économie  
de l'Ouest Canada

Canada

### Access to Information and Privacy

The [Access to Information Act](#) provides individuals or corporations present in Canada, with the right of access to information in records under the control of federal government institutions, subject to certain specific and limited exceptions.

A request for information pursuant to the Access to Information Act must be submitted in writing, providing sufficient details to identify the records being requested. The [Access to Information Request Form](#) may be used or a letter detailing the specifics of the request should be submitted to the ATIP Coordinator, and must be accompanied by the \$5 application fee (cheque or money order made payable to the "Receiver General for Canada").

The [Privacy Act](#) ensures that federal government institutions respect privacy rights of individuals by limiting the collection, use and disclosure of personal information. It also gives individuals the right to access and request correction of personal information about themselves held by these institutions.

A request for personal information pursuant to the Privacy Act must be submitted in writing with the [Personal Information Request Form](#) or a letter detailing the specifics of the request. There is no fee to request your personal information.

**All requests for information under the control of any WD office must be sent to:**

Jim Saunderson  
Access to Information and Privacy Coordinator  
Suite 1500, Canada Place  
9700 Jasper Avenue N.W.  
Edmonton, Alberta T5J 4H7  
Telephone: (780) 495-3194  
Facsimile: (780) 495-7618  
E-mail: [atip-aiprp@wd-deo.gc.ca](mailto:atip-aiprp@wd-deo.gc.ca)

# WD ATIP Intranet Web Site



Western Economic  
Diversification Canada

Diversification de l'économie  
de l'Ouest Canada

[Home](#) > [Finance and Corporate Management](#) > [Corporate Administration](#) > ATIP

## Access to Information and Privacy (ATIP)

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WD's small ATIP Unit is responsible for ensuring that WD fully meets its obligations under the *Access to Information and Privacy Acts*, and more broadly meets its commitment to openness and transparency through its Proactive Disclosure program. Following a well established process and working closely with Regional ATIP Liaison Officers (RALOs), the ATIP Unit processes formal requests by gathering relevant records, reviewing for appropriate exemptions/exclusions, consulting interested third parties or other government departments, and releasing information.



- [Access to Information Act](#)
- [Privacy Act](#)
- [2008 WD Staff Awareness Presentations](#)
  - [Access to Information](#)
  - [Privacy Act](#)

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## Proactive Disclosure

The ATIP Unit also works closely with various departmental officials to ensure the timely posting on WD's public website of the following information: Travel and Hospitality for the Minister, her exempt staff, and senior departmental officials, including the Deputy Minister and the ADMs; and Contracts over \$10,000.

- Treasury Board of Canada Secretariat -- [Guidelines on the Proactive Disclosure of Contracts](#)

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TITLE	NAME	CONTACT NO.
ATIP Coordinator	Jim Saunderson	(780) 495-4301
Deputy ATIP Coordinator	Kevin Johnson	(780) 495-6057
ATIP Officer	Barb Steele	(780) 495-4982
<b>REGIONAL ATIP LIAISON OFFICERS</b>		
British Columbia	Karla Radomsky	(604) 666-6185
Alberta	Ian McKay	(780) 495-4859
Saskatchewan	Kelly Morrison	(306) 975-6006
Manitoba	Joyce Jarosiewicz	(204) 984-5443
Ottawa	Steve Scharf	(613) 952-0676
Headquarters	Susan Fredette	(780) 495-5248





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## Privacy Act

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The purpose of the *Privacy Act* is to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information.

**[WD Privacy Protection Policy](#)** - November 19, 2008

**[WD Privacy Protection Procedures Manual](#)** - March 13, 2009

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## Privacy Impact Assessments

"As the government makes more services available on-line, protecting the privacy of Canadians' personal information and ensuring the security of their transactions with government becomes increasingly important. In 2002, the Government of Canada became the first national government to make Privacy Impact Assessments (PIAs) mandatory. This year at GTEC, it will launch an on-line, interactive tool to help departments and agencies conduct PIAs." (The President of the Treasury Board, the Honourable Lucienne Robillard, The Ottawa Citizen, October 6, 2003).

The PIA e-learning tool is a comprehensive online tutorial that builds awareness about privacy issues, educates users about privacy legislation in Canada and features a PIA Assistant. This interactive system asks users a series of questions to make sure they cover all aspects of their program or service as it might impact on privacy. To help users address each aspect, the PIA Assistant offers various courses of action to consider. When users have completed all of the questions and provided responses to each, the PIA Assistant automatically produces a draft PIA report.

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## Privacy Links

- [Privacy Act](#)
  - [Privacy Regulations](#)
  - [Personal Information Request Form](#)
  - [Privacy Commissioner](#)
  - [Privacy Impact Assessment \(PIA\) e-learning tool](#)
  - Canadian Access and Privacy Association ([CAPA](#))
  - Canadian Association of Professional Access and Privacy Administrators ([CAPAPA](#))
-



# Data Protection Day 2009

**From:** WDNNet  
**Sent:** Tuesday, January 27, 2009 10:07 AM  
**To:** \* Everyone - All Regions  
**Subject:** Data Protection Day | La Journée de la protection des données  
**Attachments:** oledata.mso



### Data Protection Day 2009: January 28th

Data Protection Day is designated to increase awareness and generate discussion about data privacy practices and rights.

Visit WDNNet for more ...

[http://wdnet/whats\\_new/2009/20090127\\_e.asp](http://wdnet/whats_new/2009/20090127_e.asp)



### Journée de la protection des données 2009 : le 28 janvier

La Journée de la protection des données est organisée en vue de sensibiliser les gens et de susciter une discussion au sujet des droits et des pratiques de protection des renseignements personnels et d'accès à l'information.

Pour en savoir plus, visitez DEONet ...

[http://wdnet/whats\\_new/2009/20090127\\_f.asp](http://wdnet/whats_new/2009/20090127_f.asp)

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## Data Protection Day 2009: January 28<sup>th</sup>

Protecting your information means knowing what's worth protecting, and how to protect it. Canada's privacy and access laws give Canadians many rights and responsibilities about their personal information and the information held by governments.

The Canadian Association of Privacy and Access Professionals (CAPAPA) developed **Data Protection Day** to help raise awareness and generate discussion about data privacy and access rights and practices.

### Think before you bin it!

WD encourages staff to recycle paper and has recycle bins throughout its offices. BUT... **there is information that should not be recycled.** If the record contains any sort of personal information about you or a WD staff member or a client (personal address, phone number, e-mail address, Social Insurance Number, PRI number, etc. of an individual), including information reprinted on fax confirmation pages, the information **MUST** be shredded!



Whether at home or in the office, be sure to shred such items as bank statements, ATM receipts, credit card offers, mailing labels, envelopes, utility bills, e-mail print-outs, and homework assignments – anything that contains personal identifiers. At WD that includes any sort of personal information not related to your roles and responsibilities within WD.

### At the Office...

- Executives and management participate in making a commitment to data protection, and help to showcase the privacy “best practices” of the Department.
- Attend refresher courses on privacy when offered. Understand what is your personal information and who has access to this information...and how to safeguard personal information in your care.
- Written comments about other individuals is the personal information of the other individual; it is not your personal information. Write only facts!
- Speak to your Central Registry staff on records retention and proper information handling practices.

### At Home...

It is reasonable to want to know how others are protecting your personally identifiable information. Phone your banker, dentist, chiropractor, insurance broker, medical benefits provider, school, lawyer, etc. and ask them these questions:

- Who is your privacy officer and how can I contact that person?
- How can I view my personal information?
- How quickly will you notify me if there is a breach that jeopardizes the security of my personal information?
- How often are your employees and contract staff given refresher training on best privacy practices?
- What was the nature of the last information privacy breach, and what did you do to make sure the same thing doesn't happen again?

### Take the “Privacy Quiz”!

Visit the Privacy Commissioner of Canada's website and take a few minutes to find out how well you know your privacy rights by taking the **Privacy Quiz** – [http://www.privcom.gc.ca/quiz/index\\_e.asp](http://www.privcom.gc.ca/quiz/index_e.asp).

### Questions?

For more information, check out the ATIP pages on WDNet:  
[http://wdnet/corp\\_services/Corp\\_Administration/ATIP/ATIP\\_main\\_e.asp](http://wdnet/corp_services/Corp_Administration/ATIP/ATIP_main_e.asp).

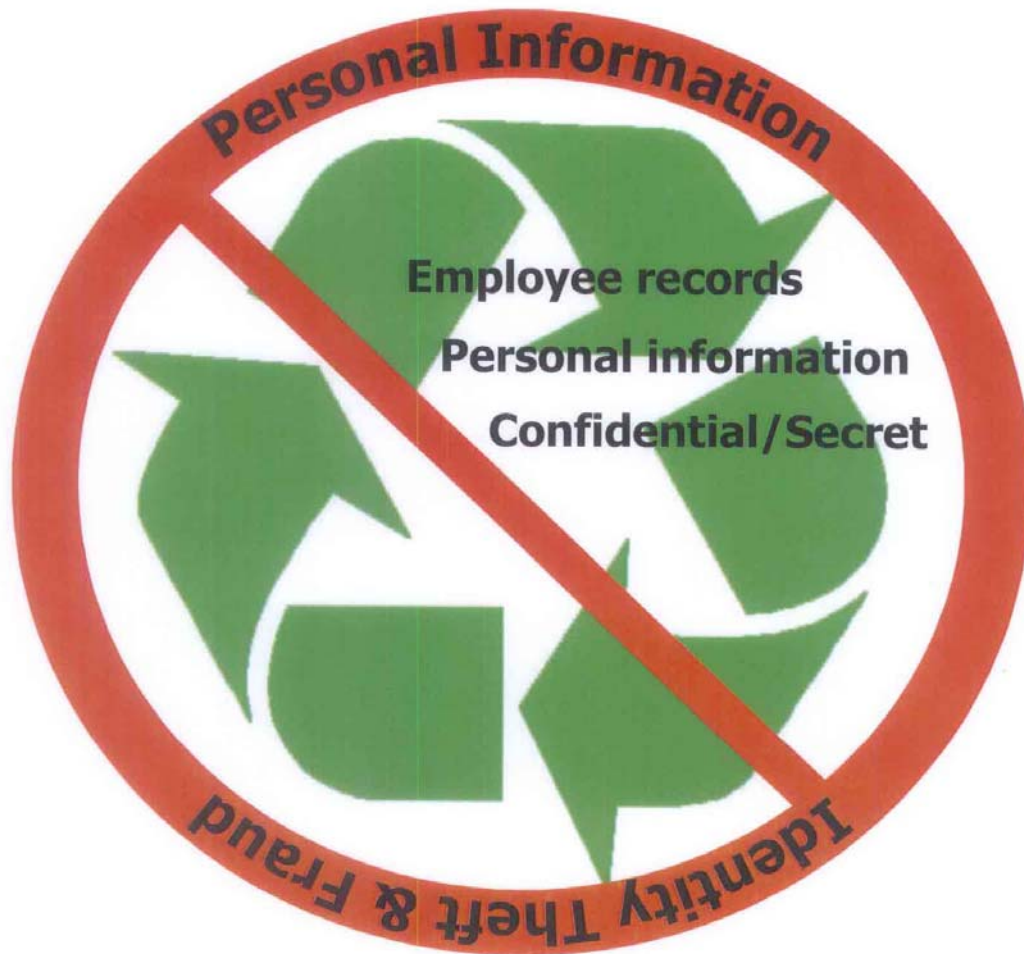


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**DATA PROTECTION DAY: January 28, 2009**

# Think before you bin it!



## Shred Confidential Information

Find your nearest shredding box or shredder  
or ask your administrative personnel to find out more.

Canada



## A message from the Deputy Minister

February 05, 2009

### Security Awareness Week February 9 to 13, 2009

Security Awareness Week has successfully promoted good security practices and raised awareness of its importance within the Government of Canada. Western Economic Diversification Canada (WD) has actively promoted security to ensure its employees and assets are protected.

WD has created various initiatives to mark this week, including an online awareness tool, "Security: I make it my business" that was launched in 2007, and introduced "sec-U-R-IT-y is everyone's responsibility" in 2008.

In 2009, WD is continuing to focus on our individual responsibility for security, and building off the theme recently established on Data Protection Day. As public servants, Canadians expect that the information that we collect, create and handle, is treated with the utmost care and respect. Security Awareness Week will focus on **protecting and handling information**.

Security-related initiatives and activities will be held throughout the week - February 9-13<sup>th</sup> -- to help employees recognize the importance of exercising due diligence, and becoming better informed on security issues.

**"You are it" is literally built into sec-U-R-IT-y!** Please play your part in helping WD safeguard its information assets through good information management practices.