



# Annual Report on the Administration of the *Privacy Act*

## 2013-2014

Employment and Social Development Canada

2013-2014 Annual Report on the Administration of the *Privacy Act*  
Employment and Social Development Canada

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## Executive Summary

Employment and Social Development Canada (ESDC) is responsible for a range of programs and services that support Canadians throughout their lives—from school to work, from one job to another, from unemployment to employment and from the workforce to retirement.

With a mandate to build a stronger, more competitive Canada, support Canadians in making choices that help them live productive and rewarding lives, and improve Canadians' quality of life, ESDC delivers its programs and services directly to clients at over 600 points of service across the nation, and responds to over 65 million calls a year. With nearly 80 million annual visits to the Department's [www.servicecanada.gc.ca](http://www.servicecanada.gc.ca) web site, individuals, businesses, and community organizations increasingly choose to interact with the Department online.

The management and delivery of ESDC's programs and services often requires the collection, use, and disclosure of an individual's personal information. For some departmental programs, detailed and sometimes sensitive personal information is required to determine program eligibility or to receive benefits and services. Respect for privacy and a commitment to personal information protection is core to the delivery of ESDC's programs and services.

ESDC is subject to the personal information protection requirements set out in the *Privacy Act* as well personal information protection provisions in the Department's "Privacy Code" that is contained within Part IV of the *Employment and Social Development Act*. The Department's Privacy Code imposes standards for the management and protection of personal information that take precedence over the requirements of the *Privacy Act*.

Since 2011, the Department has identified privacy protection as a key management priority. The Department's 2012-2013 *Annual Report to Parliament on the Administration of the Privacy Act* highlighted a number of privacy management accomplishments, including the modernization of privacy policies and processes, the re-design of its privacy impact assessment process, the assessment of privacy risks and control frameworks, the continued implementation of Program-led Privacy Action Plans for the Department's major statutory programs, and privacy awareness and training initiatives. Privacy incidents in 2012-2013 involving the loss of personal information reinforced the need to ingrain personal information protection and the stewardship of information into the organizational culture.

ESDC made important progress on the implementation of its privacy management priorities in 2013-2014. Notable privacy management accomplishments in 2013-2014 included: the establishment of an Annual Privacy and Security Work Plan to enhance the strategic planning and prioritization of privacy and security projects; the approval of a new Departmental Policy on Privacy Management; direct employee engagement on privacy and security awareness; the launch of mandatory privacy training as part of the mandatory online training on the stewardship of information; the re-alignment of the corporate

privacy function; the continued coordination of privacy impact assessments of new programs, services, and information sharing arrangements; the continued implementation of Program-led Privacy Action Plans; and, the approval of an Information Sharing Agreements Work Plan.

The effective management and protection of personal information is important to of ESDC's mission. It is also a necessary pre-condition to maintaining the public's trust. Moving forward, the Department will continue in its efforts to promote a proactive, risk-based approach to privacy management and nurture an organizational culture committed to the stewardship of information.

## 1.0 Introduction

The *Privacy Act*, which came into force on July 1, 1983, imposes obligations on federal institutions to respect the privacy rights of individuals by limiting the collection, use and disclosure of personal information. The *Privacy Act* also gives individuals the right of access to their personal information and the right to request the correction of that information.

Section 72 of the *Privacy Act* requires the head of each federal institution subject to the Act to submit an annual report to Parliament on the administration of the Act following the close of each fiscal year.

On July 15, 2013, the Honourable Jason Kenney was sworn in as Minister of Employment and Social Development. Concurrently, the Department's name was changed from Human Resources and Skills Development Canada to Employment and Social Development Canada (ESDC).<sup>1</sup>

ESDC's mission is to build a stronger and more competitive Canada, to support Canadians in making choices that help them live productive and rewarding lives and to improve Canadians' quality of life. The Department delivers a range of programs and services that affect Canadians throughout their lives through three business lines: programs that support employment and social development; the Labour Program; and Service Canada.

To fulfill its mission, the Department is responsible for the following:

- Supporting a flexible national labour market;
- Increasing participation in the labour force;
- Removing barriers to post-secondary education attainment and skills development;
- Overseeing federal labour responsibilities;
- Providing income support to seniors, the disabled, families with children and Employment Insurance beneficiaries; and
- Delivering certain Government of Canada programs and services on behalf of other departments and agencies.

Included in these core roles are responsibilities for the design and delivery of some of the Government of Canada's most well-known statutory programs and services, including:

- Old Age Security;
- Canada Pension Plan;
- Employment Insurance;
- Canada Student Loans and Grants;
- Canada Education Savings Program;

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<sup>1</sup> Throughout this report, the terms "Human Resources and Skills Development Canada" and "HRSDC" are used to reference departmental activities prior to the name change and for ease of reference. Unless otherwise stated, these refer to "Employment and Social Development Canada" and "ESDC" respectively.

- National Child Benefit; and
- Universal Child Care Benefit.

In delivering on its mandate in 2013-2014, ESDC oversaw a budget of more than \$108 billion, including over \$83 billion earmarked for income security, access to opportunities and well-being for individuals, families and communities.

## 2.0 Privacy Management at ESDC

ESDC is one of the largest and most regionally present federal departments in the Government of Canada. Citizens and clients interact with ESDC on a daily basis through hundreds of points of service. The Department works in collaboration with partners and stakeholders in the not for profit sector, the private sector and other levels of government within Canada and beyond. ESDC maintains an inventory of information sharing agreements to facilitate work with partners and enable the efficient and effective delivery of services to clients.

ESDC is broadly recognized as holding more personal information than any other department in the Government of Canada. The management of the Department's personal information holdings is a complex undertaking. Client personal information is located both physically and electronically across several systems, program areas, branches, offices and regions across the country. For many programs, responsibility for the protection of personal information throughout the program life cycle is shared across branches and regions.

### 2.1 ESDC's Legal Framework for Privacy

The *Privacy Act* protects the privacy of individuals with respect to their personal information held by government institutions. The *Privacy Act* also provides individuals with a right of access to that information as well as the right to request the correction of inaccurate information. Sections 4 to 8 of the *Privacy Act*, commonly referred to as the 'Code of Fair Information Practices', govern the collection, use, disclosure, retention and disposal of personal information.

In addition to the *Privacy Act*, the management of personal information at ESDC is also governed by Part 4 of the *Department of Employment and Social Development Act* which applies to the protection of personal information. Also referred to as the 'Privacy Code', Part 4 of the Act establishes the rules that apply to the protection, use and making available of personal information obtained and prepared by ESDC. The Privacy Code contains privacy protection provisions which take precedence over those found in subsection 8(2) of the *Privacy Act* governing the disclosure of personal information.



## 2.2 ESDC's Privacy Delegations

Section 73 of the *Privacy Act* and section 11 of the DESD Act empower the head of the institution to delegate any of the powers, duties or functions assigned to him or her by those Acts to employees of the institution.

ESDC's 2012-2013 *Annual Report to Parliament on the Administration of the Privacy Act* indicated that the Department was updating its privacy delegations to reflect the Privacy Code and that a new Delegation Order would be included in the 2013-2014 report. The new Delegation Order is anticipated to be completed in 2014-2015. Once a new Delegation Order has been approved, it will be made available on ESDC's website in keeping with the Department's commitment to transparency and accountability.

Until such time as a new Delegation Order is produced, the version found in the 2012-2013 Report and reproduced in this year's report as Annex A remains in effect.

## 2.3 ESDC's Policy Framework for Integrated Privacy Management

Given the importance of personal information protection at ESDC, the Department has adopted a risk-based and proactive approach to privacy management that promotes the concept of "Privacy by Design". Privacy by Design emphasizes the importance of building privacy directly into the design and architecture of new programs, systems, technologies and business processes. ESDC's Privacy Management Framework includes the following key elements:

- **Governance and Accountability** – Roles and responsibilities for privacy management are clearly defined to meet legal requirements, regulations, policies, standards and public expectations.
- **Stewardship of Personal Information** – Appropriate privacy protections are implemented to manage personal information through its life cycle.
- **Assurance of Compliance** – Formal processes and practices are established to ensure adherence to privacy specifications, policies, standards and laws.
- **Effective Risk Management** – Structured and coordinated risk assessments are conducted to limit the probability and impact of negative events and maximize opportunities through risk identification, assessment and prioritization.
- **Culture, Training, and Awareness** – The protection of personal information is a core organization value and is fundamental to maintaining the public's trust. Formal privacy training and awareness activities promote a privacy-aware organization that values the stewardship of information.

## 2.4 ESDC's Privacy Governance

ESDC fosters governance and decision-making responsibilities for privacy through the Department's Corporate Management Committee, the Privacy and Information Security Committee, and associated sub-committees and working groups.

### 2.4.1 Corporate Management Committee

The Corporate Management Committee, a standing committee of ESDC's Portfolio Management Board, oversees the implementation of the Portfolio's management agenda, as approved by the Portfolio Management Board, including the achievement of the management outcomes and objectives set out in the Integrated Business Plan, the Management Accountability Framework, and the corporate fiscal and planning processes. The Committee also oversees departmental activities related to the operationalization of departmental security and privacy plans and priorities.

### 2.4.2 Privacy and Information Security Committee

The Privacy and Information Security Committee, as a sub-committee of the Corporate Management Committee, reviews matters related to privacy and to the protection of personal information. The Privacy and Information Security Committee is co-chaired by the Chief Privacy Officer and the Departmental Security Officer.

The mandate of the Privacy and Information Security Committee is to:

- Support the horizontal coordination and prioritization of issues, plans, and strategies related to the management and protection of personal information;
- Review and provide advice to the Corporate Management Committee on the annual privacy and security work plan related to the protection of personal information, specific project terms of reference and project results;
- Oversee the development, implementation and streamlining of key policies and processes to ensure privacy and security of personal information risks within the Department are mitigated;
- Review and provide advice to the Deputy Minister on privacy impact assessments and on information sharing agreements involving personal information;
- Review and provide advice to the Corporate Management Committee on the portfolio-wide implications of significant privacy and personal information protection-related initiatives (e.g., Treasury Board Secretariat policies and directives, Management Accountability Framework assessments, audits and recommendations by the Office of the Privacy Commissioner, and federal-provincial tables on privacy and personal information sharing); and

- Provide recommendations to the Deputy Minister on non-administrative uses of personal information (including, but not limited to policy analysis, research, and evaluation activities).

The Privacy and Information Security Committee is supported by the following working groups:

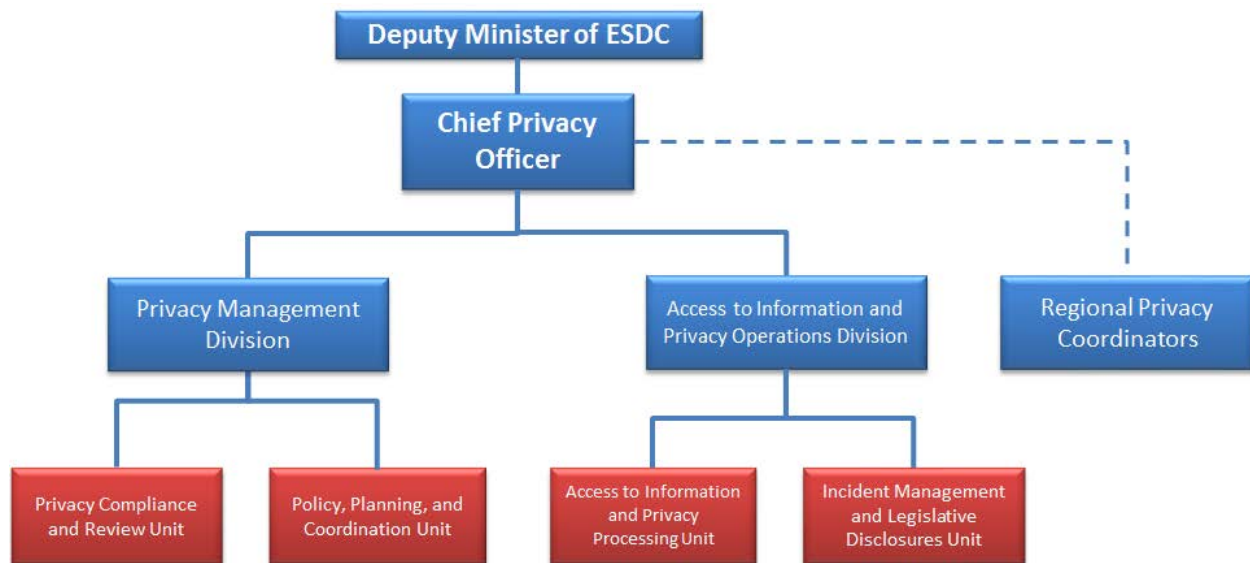
- **Databank Review Working Group** – The Databank Review Working Group supports the application of privacy policy and the use of personal information for non-administrative purposes, including policy analysis, research and evaluation activities. The working group supports the development and review of projects that request the use of identifiable personal information and/or the linkage of personal information across databanks for such purposes.
- **Departmental Security Working Group** – The Departmental Security Working Group strengthens preventive activities and facilitates the implementation of a consistent, integrated Security program throughout ESDC's portfolio and its partners by developing tools to mitigate departmental security risks, including risks related to information, assets and services. By reinforcing collaboration between key security stakeholders, the working group facilitates an integrated approach and serves as a centre of expertise for strategic advice and tools related to security.
- **Departmental Engagement Working Group** – The Departmental Engagement Working Group consists of representatives from across the Department who meet to promote integrated awareness, training and engagement strategies regarding the stewardship of information assets. A proactive strategy to engage the Department in cultural change supports effective risk mitigation and contributes to excellence in the stewardship of departmental information assets.

## 2.5 ESDC's Organization of the Privacy Function

The Corporate Secretariat is the Department's office of primary interest for the development of privacy policy, the provision of privacy advice and guidance to the portfolio, and the management of Access to Information and Privacy operations. ESDC's Corporate Secretary serves as the Department's Chief Privacy Officer.

In 2013-2014, the Corporate Secretariat realigned its organization to address the evolution of the privacy management function within the Department. The realignment included the establishment of a new Privacy Management Division and changes to the mandate and structure of the Access to Information and Privacy Division. Figure 2-1 depicts the reorganization of the privacy function as of October 1, 2013.

Figure 2-1



### 2.5.1 Chief Privacy Officer

The Chief Privacy Officer is the Department’s functional authority on privacy matters, which includes the provision of authoritative advice and functional direction to all departmental branches and regions. The Chief Privacy Officer is responsible for the proactive management of privacy issues in the Department and the establishment of comprehensive privacy management frameworks, programs, review processes, and risk-based approaches to privacy management.

In addition to establishing departmental privacy directives, standards, guidelines, and processes, the Chief Privacy Officer is accountable for the implementation of the Department’s privacy management program, including the coordination and management of privacy activities, which includes oversight of the Department’s privacy governance structure with clear accountabilities and defined objectives that are aligned with departmental and government-wide policies, priorities and plans.

### 2.5.2 Privacy Management Division

The Privacy Management Division is the departmental focal-point for the management of privacy policy and the implementation of the Department’s Privacy Management Framework. Under the authority and direction of the Chief Privacy Officer, the Privacy Management Division supports the horizontal coordination and implementation of departmental strategic plans and priorities as it relates to the protection of privacy, including the Department’s multi-year Privacy Renewal Action Plan. The Division also manages the Department’s privacy risk management function, including the privacy impact assessment process and the development of information sharing agreements involving personal information.

The Privacy Management Division includes two units:

- The **Privacy Compliance and Review Unit** provides advice, guidance, and privacy-related services to departmental officials on the application of relevant privacy legislation, policies, directives and guidance. This includes the management of the Department's Personal Information Banks in Info Source, the review of privacy notice statements, contracts, and other forms and instruments for privacy compliance, and the provision of advice and guidance for the development of Information Sharing Agreements. The Unit is also tasked with day-to-day issues management related to the protection of personal information under the custody and control of the Department.
- The **Policy, Planning, and Coordination Unit** is responsible for the development and implementation of the Department's privacy policy suite, strategic support services to the Chief Privacy Officer and the Privacy and Information Security Committee, and strategic planning and reporting functions. The Unit is also responsible for the design and implementation of the Department's Privacy Program, the privacy risk management process, the review and assessment of strategic policy and program priorities, and research and evaluation of emerging trends. The Unit also supports the management and implementation of horizontal issues and working groups.

### 2.5.3 Access to Information and Privacy Operations Division

The Access to Information and Privacy Operations Division carries out the Department's legislated requirements under the *Privacy Act* and the *Access to Information Act*. The Division leads the processing of all requests under the *Access to Information Act*, and coordinates the processing of *Privacy Act* requests, many of which are handled at the regional level. This work involves responding to requests from the public and delivering training and awareness programs to employees with respect to administration of the two Acts.

The Division is also responsible for providing guidance to the regions with respect to the operational and reporting components of the Access to Information and Privacy function. As part of the delegated authority within this unit, the Division responds to legal instruments in which the Department is asked to share personal information, (i.e., subpoenas, court orders, search warrants), liaises with the Office of the Information Commissioner and the Office of the Privacy Commissioner regarding complaints received by the Department, and serves as the departmental point of contact with the Office of the Privacy Commissioner on privacy breaches. The Division is also responsible for managing the disclosure of information to third parties via public interest disclosures.

The Access to Information and Privacy Operations Division includes two units:

- The **Access to Information and Privacy Processing Unit** performs a line-by-line review of records requested under the ATIA and the *Privacy Act*. Reports are provided for information purposes on a weekly basis to the Deputy Ministers' Offices and the

Ministers' Offices, both on new Access to Information requests and upcoming releases under the *Access to Information Act*.

- The **Incident Management and Legislative Disclosures Unit** helps support the consistent treatment of personal information entrusted to the Department, and leads the departmental response to all legal instruments received. The Unit also manages complaints to the Office of the Privacy Commissioner from within ESDC, and interacts with the Office of the Privacy Commissioner on privacy breaches working in partnership with the departmental Security Office.

#### 2.5.4 Regional Privacy Coordinators

The Department has a network of regional, local and branch coordinators to undertake many of its key privacy responsibilities. The majority of the thousands of *Privacy Act* requests that ESDC receives in a typical year are processed by employees within ESDC's regional offices. Regional privacy activities have been centralized under Regional Privacy Centres of Specialization to maintain capacity and expertise. ESDC's Regional Privacy Centres of Specialization officers have delegated authority to process formal privacy requests under the *Privacy Act* and also process informal requests received by the Department. Under the functional direction of the Chief Privacy Officer, regional offices also provide privacy advice and guidance to regional management and members of the public.

### 3.0 ESDC's Privacy Activities and Accomplishments 2013-2014

#### 3.1 Privacy Management Action Plan

In 2010-2011, Human Resources and Skills Development Canada (now ESDC) initiated a review of its privacy management status to identify privacy-related opportunities and risks and to adopt a proactive, risk-based approach to privacy management. The Department established a Privacy Renewal Task Force, reporting to the Chief Privacy Officer, to review privacy practices and renew the Department's Privacy Management Framework. The Privacy Renewal Task Force consulted internal and external stakeholders on privacy management frameworks, trends, best practices, and lessons-learned to inform the development of a multi-year Privacy Renewal Action Plan.

In the first phase of the Privacy Renewal Action Plan (2011-2012), ESDC conducted a series of risk assessments of its major statutory programs and information holdings. Following the assessment of program privacy risks, Program-led Privacy Action Plans were developed and approved in 2012-2013 for eight of the Department's major statutory programs and information holdings as part of the second phase of the Privacy Renewal Action Plan.

In addition, the Department developed a new Directive on How to Respond to Security Incidents Involving Personal Information, and conducted a review of privacy policies and the privacy-related roles and responsibilities of employees. Other key priorities of the second phase of the Privacy Renewal Action Plan included the re-design of the

Department's privacy impact assessment process; the development of a mandatory privacy and security training program; and promotion of privacy awareness.

Also in 2013, pursuant to the 2012 *Budget Implementation Act*, ESDC harmonized and consolidated the privacy provisions contained in five pieces of departmental and program legislation into a single Privacy Code under the *Department of Employment and Social Development Act* (now the DESD Act).

In 2013-2014, the Department's privacy management priorities emphasized efforts to ingrain privacy and security awareness in organizational culture; enhance the strategic planning of departmental privacy and security priorities; identify, assess, and mitigate privacy risks in new programs or initiatives; formalize privacy management roles and responsibilities; and finalize the new Departmental Policy on Privacy Management.

Notable privacy management accomplishments in 2013-2014 include: the establishment of an Annual Privacy and Security Workplan overseen by the Privacy and Information Security Committee; development and approval of a new Departmental Policy on Privacy Management; development of a draft directive and procedures for the disclosure of personal information; approval of a departmental work plan on the management of information sharing agreements; re-alignment of the corporate privacy function; direct employee engagement on privacy and security awareness; the development of a portal to facilitate staff access to information related to the Stewardship of Information; continued implementation of the Program-led Privacy Action Plans; launch of mandatory training for privacy, security, information management, information technology security, access to information, and values and ethics under the auspices of the Stewardship of Information and Effective Workplace Behaviours training; and the identification of select privacy audit engagements, including an audit of the Program-led Privacy Action Plans. Details of these accomplishments are further elaborated below.

### **3.1.1 Annual Privacy and Security Workplan**

In 2013-2014, the Department established an integrated privacy and security work plan to support the strategic planning and implementation of the Department's privacy and security priorities. Overseen by the Privacy and Information Security Committee, the 2013-2014 privacy and security priorities included the development, review, and approval of new policies and guidance, privacy impact assessments, information sharing agreements and non-administrative uses of personal information to support policy analysis, research and evaluation activities.

### **3.1.2 New Departmental Policy on Privacy Management**

In 2013-2014, ESDC finalized the review and approval of the new Departmental Policy on Privacy Management. The Departmental Policy on Privacy Management lays out three strategic objectives: to codify the Department's baseline requirements and standards for the management and protection of personal information; to articulate clear, consistent, and

universal privacy policy principles and statements; and to identify and consolidate the roles and responsibilities of all employees with respect to privacy management and the protection of personal information.

The policy also sets out five core objectives:

- The application of strict controls on how ESDC collects, uses, retains, discloses and disposes of personal information;
- The protection of personal information against unauthorized disclosure or alteration;
- The provision of timely responses to *Privacy Act* requests;
- The development and implementation of directives, tools and procedures for the effective governance, management and protection of privacy; and
- Nurturing an institutional culture where the stewardship of personal information is a key area of focus.

The new privacy policy is effective as of April 1, 2014. A review of the policy and its directives will be performed every five years. Additional reviews of this policy can be conducted periodically as determined by the Deputy Minister in consultation with the Chief Privacy Officer.

### **3.1.3 Directive and Procedures for Disclosure of Personal Information**

In 2013-2014, the Department developed a draft Directive on Public Interest Disclosures. The Directive provides a systematic, step-by-step decision making process, identifies clear approval authorities and outlines legal obligations, tools and options for the release of personal information. The procedures/guidelines are intended to support a consistent approach to the disclosure of personal information across the Department and will help to maintain the public's trust in the Department's protection of their personal information. The Directive is in final stages of approval.

### **3.1.4 Program-led Privacy Action Plans**

In 2012-2013, ESDC developed Program-led Privacy Action Plans to mitigate potential privacy risks within eight of the Department's major statutory programs. Implementation of the Program-led Privacy Action Plans continued in 2013-2014, including bi-annual status reports on progress and results achieved to the Privacy and Information Security Committee. Also in 2013-2014, the Department initiated an audit of the Program-led Privacy Action Plan implementation. Audit findings are expected to be made available in 2014-2015.



### **3.1.5 Implementation of the Redesigned Privacy Impact Assessment Process**

In 2012-2013, ESDC re-designed its privacy impact assessment process, including the piloting of a structured and coordinated privacy risk assessment process, the standardization and streamlining of its privacy impact assessment reports, and the early identification and triage of privacy impact assessments. In addition to a 66% increase in the number of privacy impact assessments approved in 2013-2014, the Department significantly increased the number of privacy impact assessments under development. Moving forward, ESDC will continue to prioritize improvements to its privacy impact assessment process and privacy and security risk assessment activities.

### **3.1.6 Re-alignment of the Privacy Management Function**

On October 1, 2013, the Corporate Secretariat re-aligned and reorganized its Access to Information and Privacy (ATIP) and Privacy Renewal Divisions. The objectives of the re-alignment were to clarify the mandates, roles, responsibilities, and accountabilities of the Divisions, better align privacy resources to departmental priorities, structure the organization to optimize performance and results, and support the continued modernization of the Department's privacy function and privacy management agenda.

ESDC's new Privacy Management Division is the departmental focal-point for the management of privacy policy and the implementation of the Department's Privacy Management Framework. The re-aligned Access to Information and Privacy Operations Division administers requests to access information under the *Privacy Act* and the *Access to Information Act*, responds to potential security incidents involving personal information, and manages requests for the disclosure of personal information.

### **3.1.7 Information Sharing Agreement Workplan**

The Department approved an Information Sharing Agreement Workplan as a key 2014-2015 privacy management priority to support the implementation of a principle-based Information Sharing Agreement Management Framework. Moving forward, the Department will continue to review and assess information sharing agreement actions to reflect changes to the operating environment, lessons learned and progress achieved.

### **3.1.8 Raising Privacy Awareness: Stewardship of Information**

The Department undertook extensive privacy and security awareness activities throughout 2013-2014. This included the establishment of a departmental Engagement Strategy Working Group to develop standard information materials to raise awareness and to coordinate activities among key corporate enablers, including Privacy, the departmental Security Office, Information Technology Security, Information Management, Human Resources, and Corporate Communications.

ESDC branches and regions also developed plans to raise awareness of employee privacy and security responsibilities. All branches and regions reported full engagement of departmental employees in awareness activities.

Over thirty joint awareness sessions with branches across the Department were held with the Chief Privacy Officer, departmental Security Officer and the Director General of Strategy, Planning, Architecture and Management in the Innovation and Information Technology Branch in 2013-2014.

In addition to promoting awareness of privacy and security responsibilities, the 2013-2014 Privacy Management Action Plan also identified the need to promote practical, easy to understand, readily available information and guidance to employees to reinforce proper privacy protection practices. To this end, the Department launched an internal Stewardship of Information web site available to employees. The web site is a repository of information on the related themes of privacy, information management, physical, personnel, and information security, information technology security, and values and ethics. Each theme highlights information on employee roles and responsibilities, relevant policies and guidance, frequently asked questions, links to mandatory training, and contact information. The site also hosts a video introducing the concept of information stewardship, which was promoted extensively throughout the year in corporate communications and on corporate web sites.

On January 28, 2014, ESDC celebrated Data Privacy Day. Corporate messages were sent to all employees to raise awareness of their roles and responsibilities for the protection of personal information.

### **3.1.9 Mandatory Online Training on the Stewardship of Information**

The Department launched a new mandatory training module on the Stewardship of Information and Effective Workplace Behaviours. The mandatory integrated module covers six disciplines related to the stewardship of information (security, information management, information technology security, values and ethics, privacy, and access to information). New to employees in 2013-2014, this course supports the Department's commitment to ensuring the responsible use and care of departmental and personal information.

As of the end of the 2013-2014 reporting period, 8,669 employees had completed the Stewardship of Information and Effective Workplace Behaviours course.

## **3.2 Follow-Up on the 2012-2013 Security Incidents Involving Personal Information**

### **3.2.1 Loss of Portable Storage Devices Containing Personal Information**

The 2012-2013 *Annual Report to Parliament* reported on two incidents involving the loss of personal information and the Department's response. Following the incidents, the Department launched an awareness campaign to inform Canadians of the losses, and monitored any suspicious activity with respect to the Social Insurance Number of affected clients. In addition, the Department offered, through an agreement with Equifax Canada, a customized package of credit monitoring to individuals affected by the loss of the external hard drive and the USB key who consented to receive this service.

In 2013-2014, the Department provided additional customized credit monitoring services from TransUnion Canada to individuals who may have been affected by the security incidents. This credit protection will, along with services already provided by Equifax Canada, provide additional safeguards for credit files, including alert messages that provide notification that personal information of affected individuals may have been compromised.

### **3.2.2 Action Plan on the Minister's Commitment to Information Security**

In addition to the above, the Department initiated an Action Plan on the Minister's Commitment to Information Security to strengthen and improve the security and storage of personal information in the Department. The action plan included new, stricter protocols on the use of portable storage devices; risk assessments of portable storage devices; mandatory training; new data loss prevention technology; and disciplinary measures, up to and including termination.

During the 2013-2014 reporting period, ESDC continued the implementation of its USB Storage Devices Directive which restricts the use of portable storage devices to instances where management has validated the need, mandates the use of encrypted USB keys or hard drives, and imposes consequences for failure to comply. ESDC continued to monitor desktop computers for unauthorized USB devices, and on May 27, 2013, security software was deployed to block unauthorized use of USB devices. On June 3, 2013, security software was deployed to block all other portable storage devices, such as optical media (CD/DVD) and floppy disks. Only authorized users can save to such media.

Assistant Deputy Minister approval is required to use such devices. In addition, ESDC highlighted that laptops are tagged and tracked by serial number and report to a technical console each time they are connected to ensure proper security software is deployed. Encrypted USB keys and portable hard drives are tracked by serial number – this information is integrated into the software which is used to monitor connections to the Department's network. As a safeguard, devices are attached with a coloured tag that identifies the Department's Service Desk 1-800 number, in the event a device is found.

In addition, ESDC undertook regular security sweeps in its buildings including employee workstations. This measure seeks to raise awareness with employees while simultaneously mitigating potential privacy incidents.

ESDC also continues to execute its Information Management strategy across all branches and regions. This strategy includes the ongoing development of an inventory of information assets; defining clear parameters for the retention of information of enduring value and the proper disposal of transitory information; proper classification and designation of records; and continued implementation of appropriate access rights and encryption for information with a “Protected” designation or higher.

### **3.2.3 Office of the Privacy Commissioner Investigation into the loss of a hard drive at ESDC**

On March 25, 2014, the Office of the Privacy Commissioner released its findings on the investigation of the loss of a portable hard drive containing the personal information of 583,000 Canada Student Loans beneficiaries.

The Special Report to Parliament from the Office of the Privacy Commissioner contained ten recommendations. The investigation noted that ESDC accepted all of the recommendations from the Office of the Privacy Commissioner in full and that ESDC was well-advanced in the implementation of many of the recommendations identified. The report also stated that the Office of the Privacy Commissioner was satisfied that no further action is required by its office at that time, and that the Office of the Privacy Commissioner will follow-up with ESDC in one year to confirm the Department’s progress in the implementation of recommendations.

The complete report can be viewed on the web site of the Office of the Privacy Commissioner: [http://www.priv.gc.ca/cf-dc/pa/2013-14/pa\\_20140324\\_e.asp](http://www.priv.gc.ca/cf-dc/pa/2013-14/pa_20140324_e.asp).

## 4.0 Privacy Performance Reporting for 2013-2014

Treasury Board Secretariat's Reporting Requirements for Annual Reports to Parliament requires federal departments and agencies subject to the *Privacy Act* to provide an interpretation of the Access to Information Statistical Report for the 2013-2014 reporting period. The following is a summary of the information contained in the Statistical Report on the *Privacy Act* for 2013–2014, which is attached as Annex B.

Figure 4-1

Activity	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
Formal requests received under the <i>Privacy Act</i>	10,900	12,136	10,737	7,639	7,286
Requests completed during the reporting period	10,927	12,010	10,830	7,493	7,239
Requests completed within 30 calendar days	9,493	10,179	9,944	6,315	6,727
Requests completed within 31 to 60 calendar days	1,298	1,776	732	1,002	417
Requests completed within 61 or more calendar days	136	55	154	176	95
Complaints to Privacy Commissioner of Canada	16	17	24	17	27
Privacy impact assessments forwarded to the Office of the Privacy Commissioner	9	0*	6	6	10
Disclosures in the public interest	26	35	78	7	206

\*The 2012-2013 Annual Report on the Administration of the *Privacy Act* had mistakenly reported this number as "1" when it should have appeared as "0". This has been corrected for the 2013-2014 report.

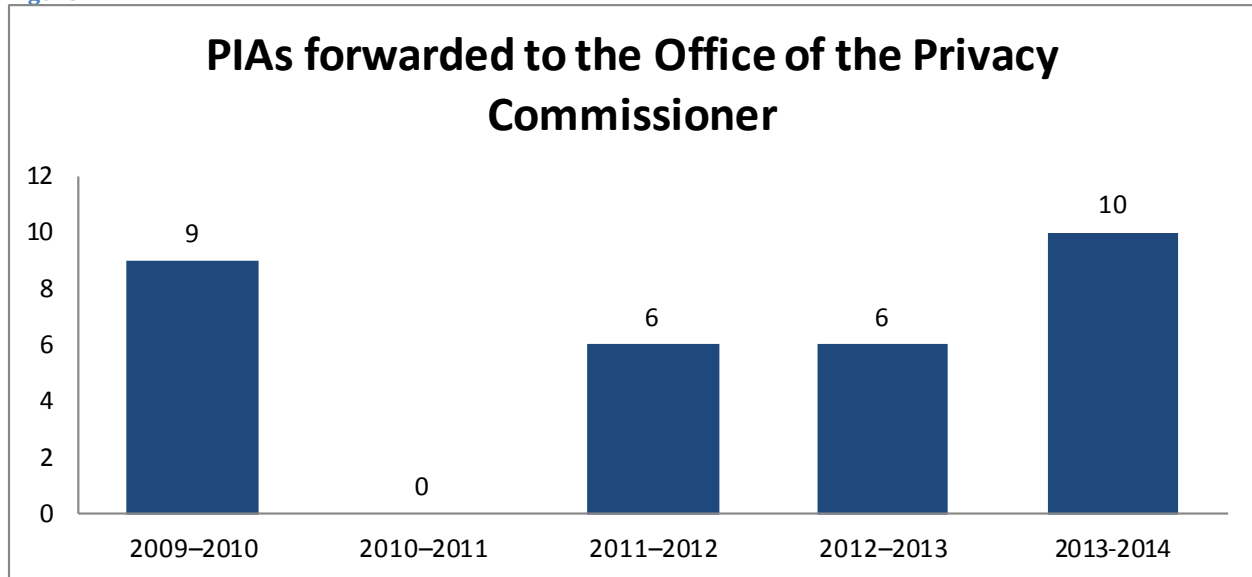
### 4.1 Completed Privacy Impact Assessments

Privacy impact assessments are policy processes for identifying, assessing and mitigating privacy risks. Government institutions are required to develop and maintain privacy impact assessments for all new or modified programs and activities that involve the use of personal information for an administrative purpose.

According to the Treasury Board Secretariat, "A privacy impact assessment (PIA) is not considered to be completed until the final, approved copy... has been sent to both the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board Secretariat."

According to this definition, ESDC completed ten privacy impact assessments in 2013–2014.

Figure 4-2



Summaries of the 10 privacy impact assessments completed in 2013-2014 are available at: <http://www.esdc.gc.ca/eng/transparency/ati/reports/pia/index.shtml>

#### 4.1.1 Aboriginal Skills and Employment Training Strategy

The objective of the Aboriginal Skills and Employment Training Strategy is to increase Aboriginal participation in the Canadian labour market by supporting demand-driven skills development, fostering partnerships with the private sector as well as with the provinces and territories and emphasizing increased accountability and results. Personal information, including the Social Insurance Number, is collected for the administration of this program.

The privacy impact assessment was performed to: provide evidence of compliance to legislative requirements and the suite of Treasury Board policies related to privacy and the management and protection of personal information; report to ESDC management on the privacy-related risks identified and assessed in the process of privacy impact assessment development and the mitigations proposed by project management to manage those risks; and replace the existing 2010 Aboriginal Skills and Employment Training Strategy privacy impact assessment.

#### 4.1.2 Citizenship and Immigration Canada - Early Initiative

For Canadians who are foreign-born or who have had their citizenship reinstated, documentary evidence is required to confirm eligibility to the Old Age Security/Guaranteed Income Supplement. Currently, it is the responsibility of the applicant to provide this evidence. Applicants that do not have this evidence must contact Citizenship and Immigration Canada to request it. Citizenship and Immigration provides this documentation on a cost recovery basis.

With the explicit consent of the applicant, this service offering will allow ESDC to contact Citizenship and Immigration directly to obtain the required documentary evidence necessary to process the applicant's file. A privacy impact assessment was performed to assess the risks associated with this service offering, and a new Service Level Agreement was developed to outline the terms and conditions required for the exchange of information with Citizenship and Immigration.

#### **4.1.3 Enabling Services Renewal Program Enterprise Resource Planning Systems, Applications and Products in Data Processing Solution**

The Enabling Services Renewal Program Enterprise Resource Planning Systems, Applications and Products in Data Processing Solution is a financial management solution that will replace the financial and material management components of the Department's legacy Corporate Management System. The Solution was approved by Treasury Board Secretariat on May 1, 2012 as a government standard to manage financial and material transactions. ESDC is implementing the Enabling Services Renewal Program as a key departmental priority to deliver simple, integrated, client-centred internal services in a less costly and more sustainable manner.

The privacy impact assessment was performed to assess changes to the processing of personal information for the Enabling Services Renewal Program Enterprise Resource Planning Systems, Applications and Products in Data Processing Solution. The Solution will replace certain components for financial and materiel management and introduce new administrative components.

#### **4.1.4 Information Sharing Agreement with the Ministère du Revenu du Québec**

ESDC has a long-standing agreement with the Canada Revenue Agency that allows ESDC to provide individual level beneficiary data on programs that are a taxable benefit for Canadians. This agreement enables the Canada Revenue Agency to administer its own tax legislation as well as the tax legislation of the provinces and territories with the exception of Quebec. Because Quebec administers its own tax system, ESDC must provide the Ministère du revenu du Québec with individual level beneficiary data on a program by program basis to support the administration of Quebec's tax system pursuant to section 36 of the *DESD Act*.

As part of the process to share 2012 tax data with the Ministère du revenu du Québec, ESDC identified the need to establish a formal information sharing agreement between ESDC and the Ministère du revenu du Québec to support this activity. The privacy impact assessment was performed to assess the risks associated to the personal information to be collected and disclosed under this information sharing agreement.

#### **4.1.5 Information Sharing Exchanges between Human Resources and Skills Development Canada and Veterans Affairs Canada**

Since 1986, ESDC and Veterans Affairs Canada (VAC) have been exchanging personal information to enable seamless access to veterans' benefits. Because of the legislative changes included in the *Jobs, Growth and Long-term Prosperity Act*, which received Royal Assent on June 29, 2012, the CPP and OAS Privacy Codes were repealed and replaced with a new amalgamated Privacy Code under the *DESD Act*. This new Code required a Memorandum of Understanding to be in place outlining the terms and conditions of all the ESDC-VAC information exchanges.

On February 28, 2013, a Memorandum of Understanding was signed between ESDC and VAC, which outlines the terms and conditions for existing and new information exchanges. A privacy impact assessment was performed to assess the risks associated to the personal information to be collected and disclosed under this new agreement.

#### **4.1.6 Labour Market Development Agreements**

Labour Market Development Agreements are bilateral agreements between the Government of Canada and the provinces and territories through which the Government of Canada invests \$1.95 billion annually in provincial and territorial labour market programming to help current and former Employment Insurance claimants prepare for and obtain employment.

The privacy impact assessment was performed to examine the sharing of information between ESDC and the Provinces and Territories in the context of Labour Market Development Agreements. The privacy impact assessment also examined the modernization of the Labour Market Development Agreement Information Sharing Annexes, and a series of systems changes brought about by the development and implementation of the Labour Market Development Agreements Information Technology System Modernization Project. A privacy impact assessment was required for this file as part of the Department's Investment Management Process for large Information Technology projects.

#### **4.1.7 Employment Insurance Benefit for Parents of Critically Ill Children**

On June 9, 2013, a new 35-week Employment Insurance benefit came into effect providing income support to claimants unable to work because they need to care for or support their critically ill or injured child. This benefit is also available to eligible self-employed individuals and fishers. Eligible claimants working under federal jurisdiction are eligible to a further 37 weeks of unpaid leave that can be shared between the individuals legally responsible for the child. This last feature required an amendment to the Canada Labour Code.

A privacy impact assessment was performed to assess the changes made to the Employment Insurance program allowing for this new special benefit.



#### **4.1.8 Record of Employment Web Online Registration and File Maintenance**

The electronic Record of Employment initiative is Service Canada's response to a long-standing request from employers to facilitate the Record of Employment creation process. In 2003, in the early stages of EI Automation, the Record of Employment on the Web (ROE Web) was launched. ROE Web allows employers to create and submit ROEs electronically; however, registration for ROE Web remains a paper process requiring an in person visit to a Service Canada Centre.

The ROE Web program must gather information about the employer and the individual registering to issue electronic ROEs. Businesses must be validated to gain access to paper or to issue electronic ROEs. In addition, ROE Web requires identification and authentication of the individual acting on behalf of the company and confirmation of the authority under which they are acting to allow sound administration and enforcement of the program by being able to identify the party the department is dealing with.

The implementation of the My Service Canada Business Account ROE Web Online Registration and File Maintenance project allowed employers to submit their ROE Web registration and to manage their ROE Web files online. This implementation will also allow users to electronically create and update their professional profile and allow Primary Officers to leverage their CRA account to validate their identity online. This is made possible by ESDC entering into an agreement with the CRA to allow ROE Web Primary Officers to validate and authenticate their identity online using CRA's Portageur Service.

The privacy impact assessment performed was limited to the Record of Employment and ROE Web Online Registration and File Maintenance. The privacy risk analysis is restricted to the collection, use, retention, and disclosure of personal information pertaining to the individual registering and accessing ROE Web.

#### **4.1.9 Sharing of Individual-Level Data under the Memorandum of Understanding between ESDC and the Office of the Superintendent of Financial Institutions**

Section 66 of the *Employment Insurance Act* specifies that the Governor-in-Council sets the EI premium rates on the joint recommendation of the Ministers of ESD and Finance. More specifically, subsection 66.1 indicates that the Minister of ESD must provide the Employment Insurance Chief Actuary at the Office of the Superintendent of Financial Institutions with data to support the preparation of actuarial forecasts and estimates. This transfer of data is governed by the Memorandum of Understanding for Actuarial Services for the purpose of the Employment Insurance Premium Rate Setting Mechanism between the Minister of ESD, the Canada Employment Insurance Commission and the Office of the Superintendent of Financial Institutions.

The privacy impact assessment was performed to assess the amendments to the ESDC/Canada Employment Insurance Commission – Office of the Superintendent of Financial Institutions Memorandum of Understanding to allow for the transfer of 100% masked individual-level Employment Insurance and Canada Revenue Agency administrative data from ESDC to the Office of the Superintendent of Financial Institutions.

#### **4.1.10 Temporary Foreign Workers Program – Phase I**

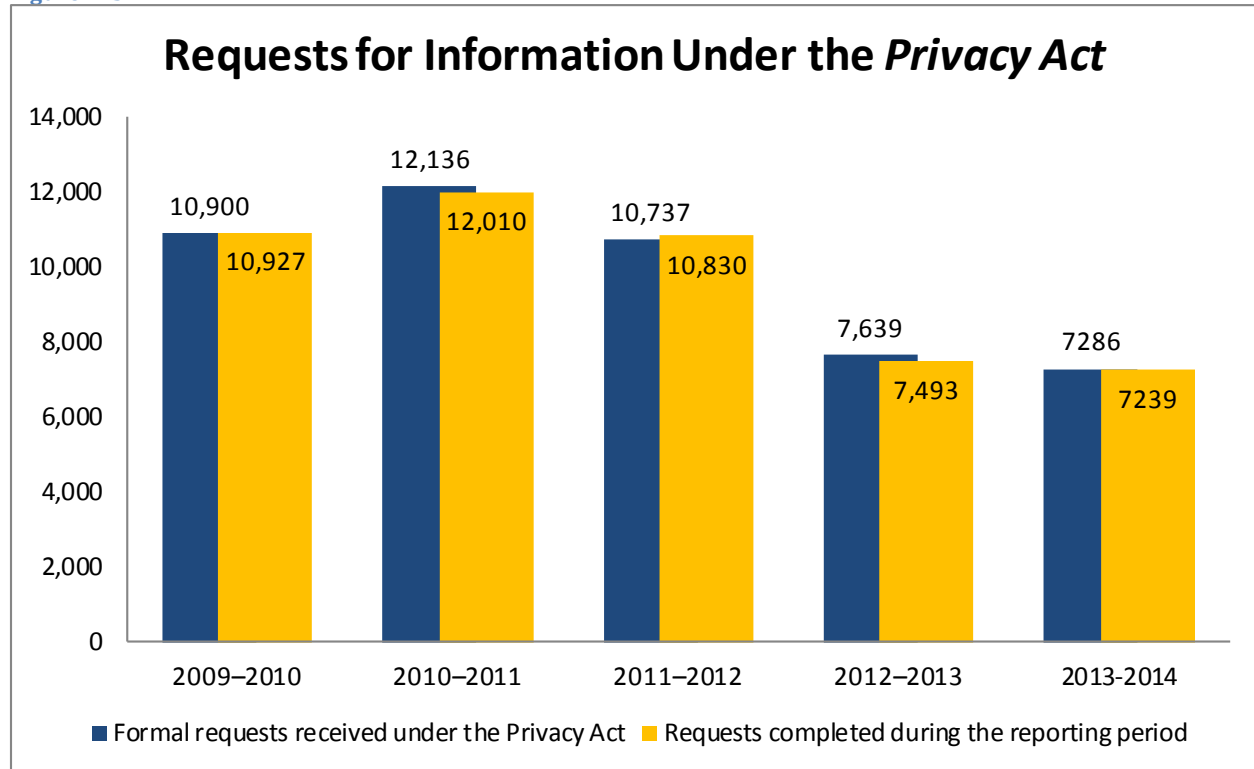
The Temporary Foreign Worker Program is jointly administered by ESDC and Citizenship and Immigration Canada and is governed by the *Immigration and Refugee Protection Act* and the *Immigration and Refugee Protection Regulations*. To support the program, ESDC assesses requests from employers seeking to hire temporary foreign workers and issues an opinion – commonly referred to as a labour market opinion or LMO – stating, whether the employment of a temporary foreign worker is likely to have a positive, neutral or negative effect on the Canadian labour market. Citizenship and Immigration Canada is responsible for assessing applications for work permits submitted by temporary foreign workers, which if granted, authorizes the worker to work in Canada. The Canada Border Service Agency, on behalf of Citizenship and Immigration Canada, determines admissibility at the port of entry when the workers arrive in Canada, and issues work permits to temporary foreign workers.

The privacy impact assessment for this program has been divided into two phases to address both the complexity of the program and the need to analyze the impacts of the implementation of regulatory changes. The Phase I report reviewed and provided evidence of the program's compliance with legislative requirements and to identify and assess residual privacy risks. Specifically, the privacy impact assessment performed assessed privacy issues and risks related to the program's operations, including the impacts of the 2011 *Immigration and Refugee Protection Act* amendments, the 2013 compliance regulatory amendments and the introduction of user fees.

## **4.2 Requests for Information under the *Privacy Act***

With the exception of 2010-2011, the number of requests received by ESDC has followed a downward trend over the course of the past five fiscal years. During the same time frame, the difference between the number of requests received and the number of requests completed in a given fiscal year has been less than 1% on average.

Figure 4-3

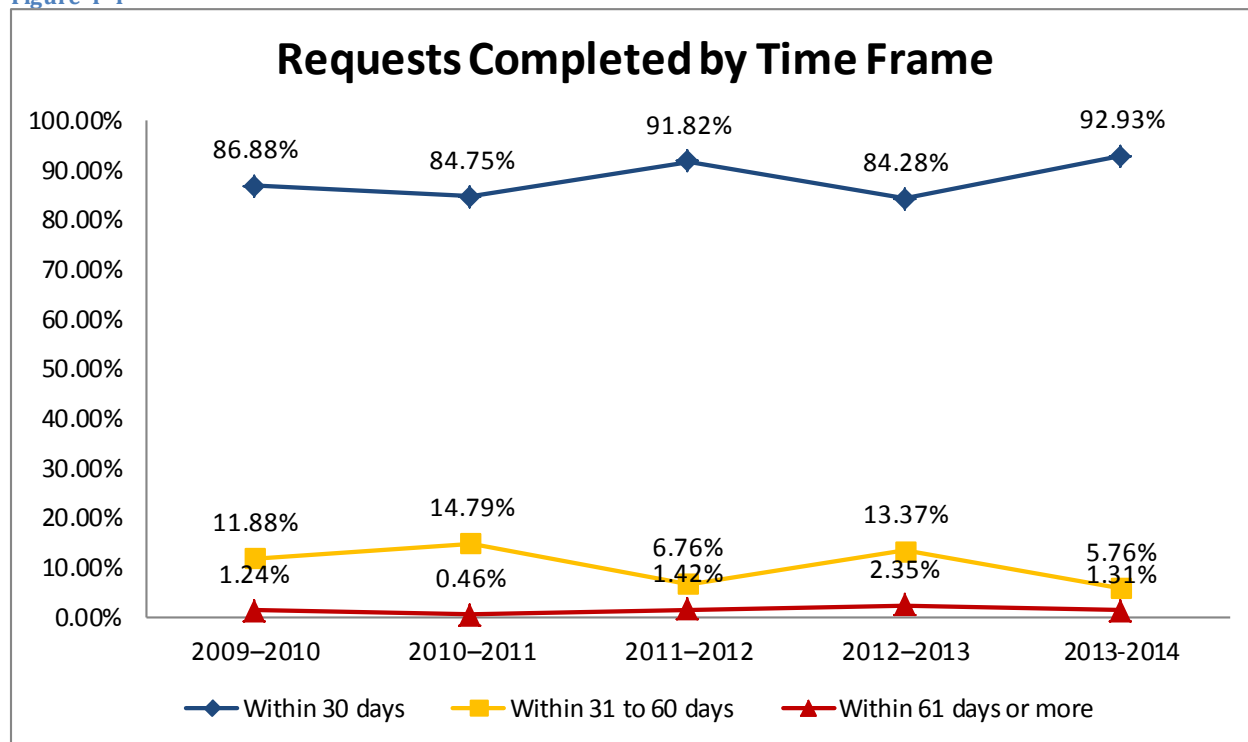


In 2013-2014, ESDC received 7,286 requests under the *Privacy Act* and completed 7,239 requests, which includes requests received before the reporting period. Typical privacy requests are from clients seeking to obtain a copy of their Canada Pension Plan file, their Old Age Security file, the contents of their Employment Insurance file or their Canada Student Loans file, as well as from employees seeking to obtain a copy of their personnel information.

Of the requests that were completed in 2013-2014, 88% resulted in at least a partial release of records to the applicant. The remaining 12% of requests fell into categories of “No records exist” and “Request abandoned” with the exception of six requests for which records were entirely exempted.

#### 4.2.1 Privacy Act Requests by Calendar Days Taken to Complete

Figure 4-4



In the past five fiscal years, the majority of requests were completed within 30 calendar days. In 2013-2014, slightly less than 93% of requests were responded to within the first 30 calendar days, with nearly 40% of requests receiving a response in the first 15 days. More than 98% of requests were processed within the first 60 days.

For the requests where an exemption was invoked, the common provision used was section 26 of the *Privacy Act*, which was applied to 4,665 requests. Section 26 seeks to protect personal information pertaining to individuals other than the requester.

The format of information released was paper for 5,910 requests and electronic for 456.

#### 4.2.2 Pages Reviewed

In 2013-2014, a total of 544,239 pages were reviewed (processed). Of these, 510,980 pages, or 94%, were disclosed (in whole or in part) to the requester. The remaining 6% were either withheld pursuant to one of the *Privacy Act's* exemption provisions or not released because the corresponding request was abandoned by the requester.

Of the pages reviewed, 6,399 requests, or 98% involved processing 500 pages or less, with 4,849 requests requiring the review of 100 pages or less and 1550 requests requiring a review of between 101 and 500 pages. While 106 requests, or 1.63%, required a review of more than 500 pages, this work resulted in the disclosure of 88,970 pages, or 17.4% of all pages disclosed.

### 4.2.3 Other Complexities

In addition to information regarding the number of pages processed, the Statistical Report contains information regarding “Other Complexities,” namely the number of requests where consultations are required, where legal advice was sought and where interwoven information exists.

The Treasury Board Secretariat defines requests containing “interwoven information” as those “where the relevant records contain personal information about another individual that is interwoven with the personal information of the requester.” The category “Other,” according to the Treasury Board Secretariat, “comprises of high profile subject matter, requests where records are in a region or other country, and requests where the records are in a language other than English or French.”

Consultations were required on 20 such requests. Legal advice was not sought on the processing of any *Privacy Act* request that was completed in 2013–2014. A total of 345 requests contained interwoven information. Finally, 6,083 requests were processed in the regions and therefore fall into the category “Other.”

### 4.2.4 Performance

In 2013–2014, the Department was unable to meet its deadline for 279 requests, representing 4.3% of requests processed. These figures represent an increase in performance from 2012–2013, when the Department was unable to meet its deadline for 990 requests, representing 13% of requests processed.

The most common reason for missing the deadline was “Workload” at 233 cases or 83.5%. Nine requests were late due to internal or external consultations. In 223 cases, the Department was late by 30 days or less. 61 requests were late by more than 30 days.

### 4.2.5 Extensions

An extension of up to 30 days beyond the initial period is permitted if responding to the request would unreasonably interfere with operations or if external consultations are required. In addition, an extension can be claimed for translation purposes or to convert a record to another format. Translation/conversion extensions are not limited to a 30-day maximum, as is the case for interference with operations and consultation extensions.

In 2013-2014, ESDC claimed an extension on 153 requests. This represents an increase from 2012-2013 when the Department claimed extensions on 116 requests.

#### **4.2.6 Translation of Records**

A total of three requests were made for the translation of records by applicants. One request was for translation from English to French, which was approved, and two were for translation from French to English, which were both refused. Translations were accepted in all three instances.

#### **4.2.7 Requests for Correction of Information**

Individuals have a right to request correction of any erroneous personal information pertaining to them providing that the individuals can adequately substantiate their case. Eight requests for correction of personal information were received in 2013–2014. Five requests were accepted and one request was denied. Two requests resulted in a notification being attached to the file.

#### **4.2.8 Consultations Received by ESDC**

ESDC responded to 14 consultations in 2013–2014, all of which were received from other government institutions, corresponding to a review of 1,174 pages. Nine of these consultations resulted in a recommendation to entirely disclose the records, with five counselling the consulting department or organization to disclose in part. Consultations with the Privy Council Office on Cabinet Confidences were not required during the reporting period.

#### **4.2.9 Financial Considerations**

In 2013–2014, the Department spent over \$3.6 million on salaries associated with administering the *Privacy Act* as well as \$65,000 on overtime. Non-salary costs amounted to about \$340,000 for a total of approximately \$4 million. In 2013–2014, 20.0 full-time equivalents (FTEs) in the regions and 30.15 full-time equivalents at National Headquarters were involved in the administration of the *Privacy Act*.

### **4.3 Privacy Training and Awareness Activities**

Recognizing the importance of mandatory privacy training for all ESDC employees, the Department released its Stewardship of Information and Effective Workplace Behaviours training program in 2013-2014. As of March 31, 2014, 8,669 employees had completed the mandatory training. In addition, over 30 joint awareness sessions were delivered by the Chief Privacy Officer, the departmental Security Officer, and the Director General, Strategy, Planning, Architecture, and Management. In June 2013, all ESDC branch heads reported full engagement of departmental employees on the stewardship of information.

In 2013–2014, the ATIP Operations Division provided 14 in-person training sessions on access to information and privacy issues to 109 employees across the Department. In response to recurring questions from program experts regarding the scoping of records and on the formulation of recommendations regarding the exemption and exclusion

provisions of the *Access to Information Act*, the ATIP Operations Division updated and shared its guidance on these topics with program areas. Recognizing that not all employees are tasked with requests on a regular basis, the guidance is brief and provides key pointers to assist those responsible for gathering records to fulfill their responsibilities. Figures 4-5 and 4-6 provide statistical information on specific ATIP training delivered by the ATIP division over the past five years. These figures do not reflect all privacy-related training completed by ESDC employees.

Figure 4-5

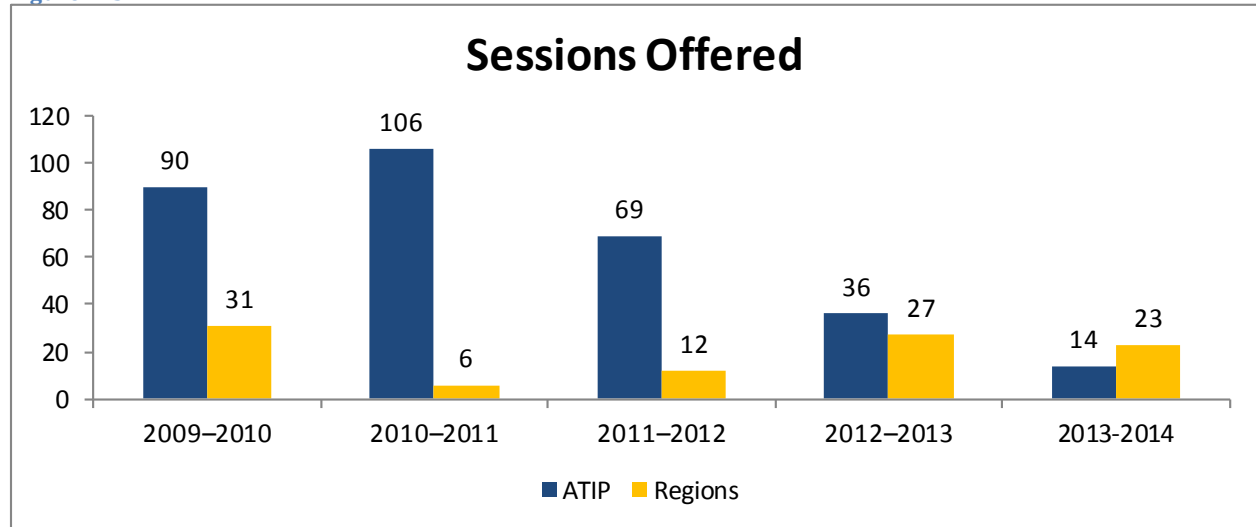
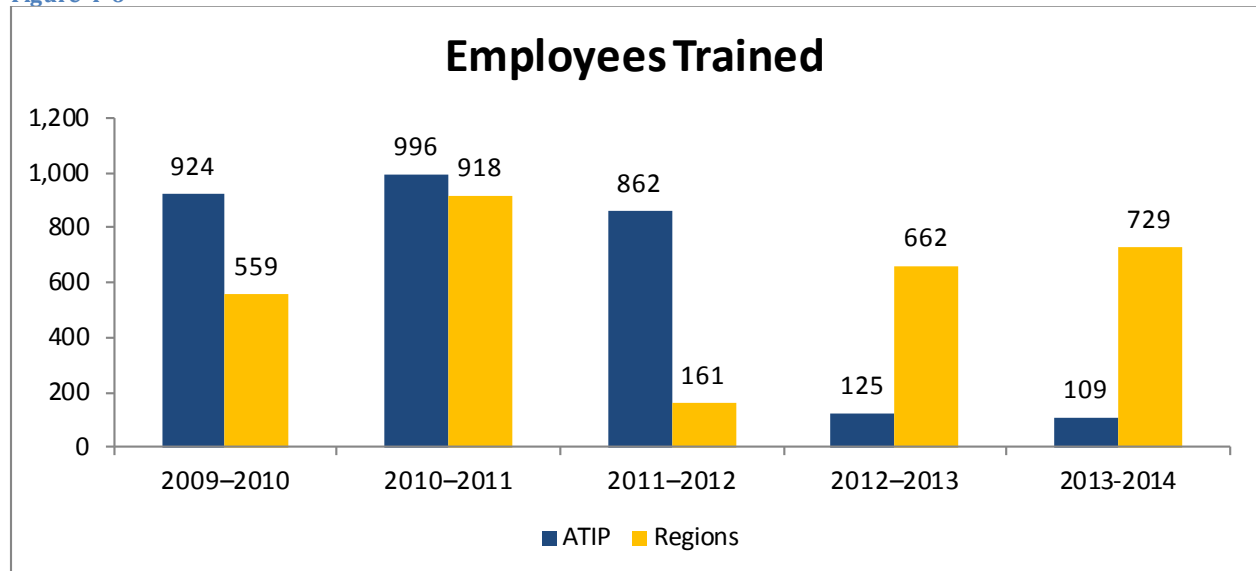


Figure 4-6

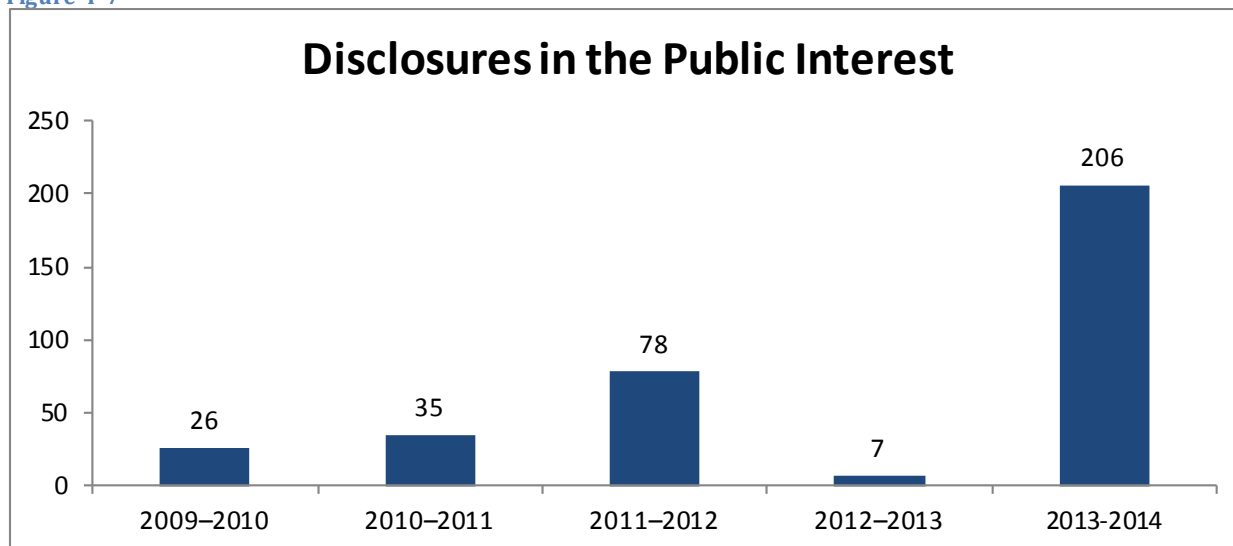


In addition to the sessions that were offered by the ATIP Operations Division, the regional officials responsible for privacy in the regions also provided information sessions to their colleagues. Regional officials provided 20 sessions to 677 employees during 2013-2014.

Overall, provision of in-person privacy training has declined over the past three fiscal years as the Department transitions to an online, self-directed learning model, not only for privacy but for all forms of training offered to ESDC employees.

#### 4.4 Public Interest Disclosures

Figure 4-7



As per section 2.1, “ESDC’s Legal Framework for Privacy” Part 4 of the DESD Act takes precedence over section 8(2) of the *Privacy Act* as it relates to the disclosure of personal information. Accordingly any disclosures in the public interest are made in accordance with subsection 37(1) of the DESD Act, which states that personal information may be disclosed:

*...if the Minister is of the opinion that the public interest in disclosure clearly outweighs any invasion of privacy that could result from the disclosure or that disclosure would clearly benefit the individual to whom the information relates.*

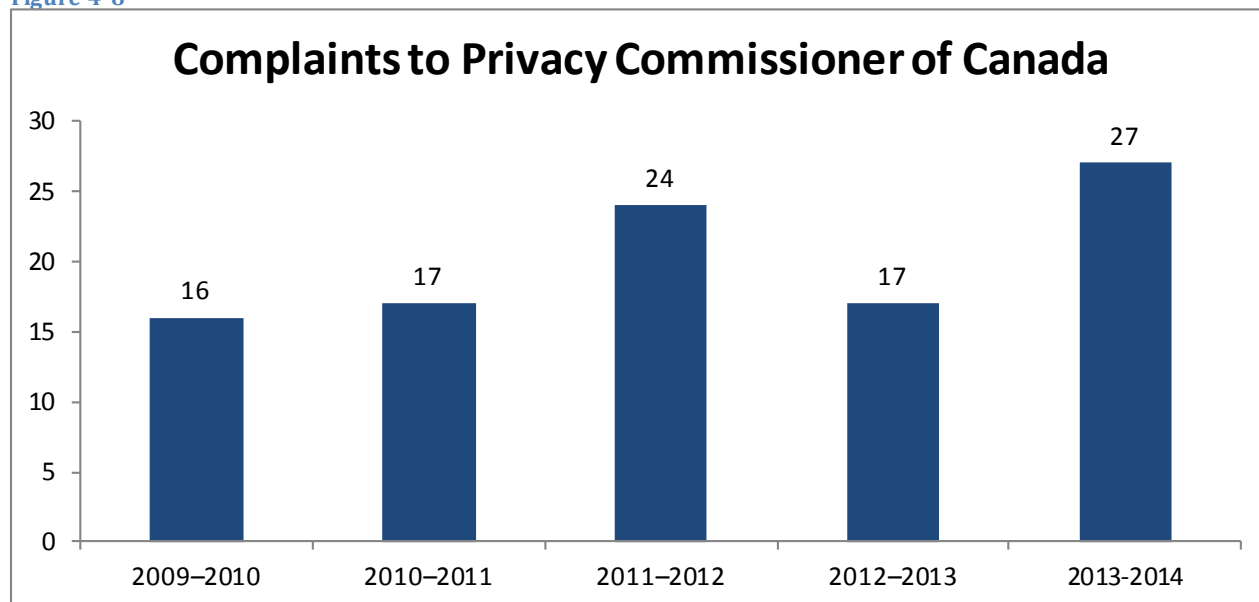
In fiscal year 2013-2014, the Department made 206 public interest disclosures under subsection 37(1) of the DESD Act. The Office of the Privacy Commissioner was notified in all instances.

It should be noted that the 206 disclosures recorded in 2013-2014 include 114 public interest disclosures previously mentioned in the 2012-2013 annual report. These 114 disclosures should have been more accurately represented as having been completed in the 2013-2014 reporting period which is when they were reported to the Office of the Privacy Commissioner. The graph above (figure 4-7) more accurately portrays 7 disclosures as having been completed and reported in 2012-2013.



## 4.5 Complaints and Investigations

Figure 4-8



In 2013-2014, the Department was notified of 27 complaints received by the Office of the Privacy Commissioner. Of these cases, seven related to delay, seven related to denied access, one related to refusal, eight pertained to improper disclosure and four were regarding improper use.

In the same fiscal year, ESDC received findings on a total of 15 complaints. The Office of the Privacy Commissioner ruled that three complaints were not substantiated, two were not well founded, three were settled in the course of investigation, four were well founded, one was resolved and two were discontinued.

Finally, as outlined in the Office of the Privacy Commissioner Report, referenced in section 3.2.3, “OPC Investigation into the loss of a hard drive at ESDC”, the complaints related to the Hard Drive and USB Key Incidents resulted in ESDC issuing new IT Security Guidelines to all departmental staff on January 14, 2013. The “USB Storage Devices Directive” provides direction that only authorized USB devices are allowed for use on departmental computers. This includes portable hard drives and USB keys. In addition, the Department updated its “Information and Classification Guide” on January 15, 2013.

## 4.6 Material Privacy Breaches

No material privacy breaches were reported to the Office of the Privacy Commissioner in 2013-2014.

## 5.0 Annexes

### Annex A: Delegation Order

Figure 5-1

#### ORDONNANCE DE DÉLÉGATION DE POUVOIRS

#### RESSOURCES HUMAINES ET DÉVELOPPEMENT DES COMPÉTENCES

En vertu de l'article 11 de la *Loi sur le ministère des Ressources humaines et du Développement des compétences*, de l'article 17 de la *Loi sur le ministère du Développement social* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, la ministre des Ressources humaines et du Développement des compétences délègue, par les présentes, aux personnes, cadres ou employés qui occupent les postes mentionnés en annexe au ministère des Ressources humaines et du Développement des compétences, ou aux personnes, cadres ou employés occupant ces postes à titre intérimaire, les attributions de la ministre ou du responsable de l'institution, comme il est indiqué en annexe.

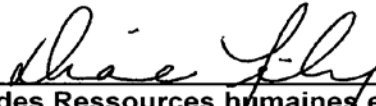
- *Partie 4 de la Loi sur le ministère des Ressources humaines et du Développement des compétences*
- *Partie 2 de la Loi sur le ministère du Développement social*
- *Loi sur la protection des renseignements personnels*

#### DELEGATION ORDER

#### HUMAN RESOURCES AND SKILLS DEVELOPMENT

The Minister of Human Resources and Skills Development, pursuant to section 11 of the *Department of Human Resources and Skills Development Act*, section 17 of the *Department of Social Development Act* and section 73 of the *Privacy Act* hereby designates the persons, officers or employees holding the positions with Human Resources and Skills Development set out in the schedules attached hereto, or the persons, officers or employees occupying on an acting basis those positions, to exercise the powers or perform the duties or functions of the Minister or to exercise or perform the powers, duties or functions of the head of the institution, as specified in the attached schedules.

- *Part 4 of the Department of Human Resources and Skills Development Act*
- *Part 2 of the Department of Social Development Act*
- *Privacy Act*

  
\_\_\_\_\_  
Ministre des Ressources humaines et du  
Développement des compétences / Minister of  
Human Resources and Skills Development

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Employment and Social Development Canada

Figure 5-2

Delegated Officials	Delegated Authority	<i>Department of Human Resources and Skills Development Act provision (Repealed, 2012, c. 19, s. 685)</i>	<i>Department of Social Development Act provision (Repealed, 2012, c. 19, s. 685)</i>
Deputy Minister, ESDC Senior Associate Deputy Minister/ Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, Access to Information and Privacy (ATIP)	<i>Determining the conditions under which the information may be made available to an individual or their representative or to a member of Parliament inquiring on behalf of an individual.</i>	33(2)	27(2)
Deputy Minister, ESDC	<i>Determining whether it is advisable to make information available, and agreeing to the conditions under which information may be made available, to a minister or a public officer of a prescribed federal institution for the administration or enforcement of a prescribed federal or provincial law or activity</i>	35(2)	29(2)
Deputy Minister, ESDC	<i>Determining whether it is advisable for the minister or a public officer of a prescribed federal institution to which information was made available under 35(2) of the DHRSD Act or 29(2) of the DSD Act to make that information available for the same purpose, and agreeing to the conditions under which that information may be made available, to any other person or body</i>	35(3)	29(3)
Deputy Minister, ESDC	<i>Determining whether it is advisable to make information available, and agreeing to the conditions under which the information may be made available, to the government of a province, or to a public body created under the law of a province, for the administration or enforcement of a federal law or activity or a provincial law</i>	36(1)	30(1)
Deputy Minister, ESDC	<i>Determining whether it is advisable to make information available, and agreeing to the conditions under which the information may be made available, to the government of a foreign state, an international organization of states or an international organization established by the governments of states, or any institution of any such government or organization, for the administration or enforcement of a law.</i>	36(2)	30(2)
Deputy Minister, ESDC	<i>Determining whether it is advisable for a government, public body, organization or institution to which information was made available under subsection 36(1) or (2) of the DHRSD Act or 29(1) or (2) of the DSD Act to</i>	36(3)	30(3)

2013-2014 Annual Report on the Administration of the *Privacy Act*  
Employment and Social Development Canada

	<i>make that information available for the same purpose, and agreeing to the conditions under which that information may be made available, to any other person or body</i>		
Deputy Minister, ESDC Senior Associate Deputy Minister/ Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP <b>For only those situations where there is a threat to the safety and/or security of an individual:</b> departmental Security Officer Regional Security Officers Regional Privacy Coordinators Service Area Managers Call Centre Managers Manager, Corporate Security Security Advisor, Corporate Security	<i>Determining whether the public interest in disclosing the information clearly outweighs any invasion of privacy that could result from the disclosure or determining whether disclosure would clearly benefit the individual to whom the information relates.</i>	37(1)	31(1)
Deputy Minister, ESDC Senior Associate Deputy Minister/ Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP	<i>Authority to notify the Privacy Commissioner</i>	37(2)	31(2)
Deputy Minister, ESDC	<i>Determining whether the disclosure for research or statistical purposes to any person or body, is consistent with the principles set out in paragraphs 39(1)a) to e) of the DHRSD Act or in paragraphs 33(1)(a) to (e) of the DSD Act.</i>	38(a)	32(a)
Deputy Minister, ESDC	<i>Determining whether the research or statistical purpose for which information is to be made available to any person or body cannot reasonably be accomplished unless the information is provided in a form that may identify the individual to whom the information relates</i>	38(b)	32(b)
Deputy Minister, ESDC	<i>Determining the conditions under which the information may be made available for research or statistical purposes to any person or body</i>	38(c)	32(c)
Deputy Minister, ESDC Senior Assistant Deputy Minister Strategic Policy and Research	<i>Authorizing a public officer to use information for the purpose of policy analysis, research or evaluation when the information would allow an individual to be identified.</i>	39(2)	33(2)
<b>CRIMINAL:</b> Deputy Minister, ESDC Senior Associate Deputy Minister/ Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP	<i>Determining whether it is appropriate for the Minister, members of the Employment Insurance Commission, or public officers to give, in connection with any legal proceedings, evidence relating to information that is privileged under s. 32 of the DHRSD Act or under s. 26 of the DSD Act or to produce a statement or other writing</i>	40	34

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<p><b>CIVIL:</b> Deputy Minister, ESDC Senior Associate Deputy Minister/ Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP ADM, Ontario Region Regional Executive Heads Regional Privacy Coordinators</p>	<p><i>containing any such privileged information</i></p>		
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**Note:** The following delegation is limited to the collection of information:

**Figure 5-3**

Delegated Officials	Delegated Authority	<i>Department of Human Resources and Skills Development Act provision</i>	<i>Department of Social Development Act provision</i>
Deputy Minister, HRSD	<i>Authority to enter into agreements to obtain information for the administration or enforcement of a program with federal institutions, governments of provinces or public bodies created under provincial law, governments of foreign states, international organizations of states or international organizations established by the governments of states, any institution of any such government or organization, and other persons or bodies</i>	41	35

**Privacy Act – Delegation of Authority  
Human Resources and Skills Development Canada**

**Figure 5-4**

Description	Section	Delegated Authority
Approval to disclose for research or statistical purposes	8(2)(j)	Deputy Minister
Approval to disclose personal information when the public interest in disclosure clearly outweighs any invasion of privacy that could result from the disclosure or the disclosure would clearly benefit the individual to whom the information relates	8(2)(m)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP  <b>For those situations where there is a threat to the safety and/or security of an individual:</b> departmental Security Officer Regional Security Officers Regional Privacy Coordinators Service Area Managers Call Centre Managers Manager, Corporate Security Security Advisor, Corporate Security
Retention of a record of requests and disclosed records to investigative bodies under section 8(2)(e) of the <i>Privacy Act</i> .	8(4)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP

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		Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators
Notification of the Privacy Commissioner of all disclosures made under paragraph 8(2)(m) of the <i>Privacy Act</i> (public interest).	8(5)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP
Retention of records of uses of personal information	9(1)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP
Notification of the Privacy Commissioner of any new consistent uses of personal information and ensure use is included in next statement of consistent uses set forth in the Index	9(4)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP
Include personal information in personal information banks	10(1)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP
Respond to request for access within 30 days and give written notice and, if access to be given, give access.	14	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators Positions as per Annex A1
Extension of the 30 day time limit to respond to a privacy request.	15	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators Positions as per Annex A1
Decision on whether to translate a response to a privacy request in one of the two official languages.	17(2)(b)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP

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		Public Rights Analyst, ATIP Regional Privacy Coordinators Positions as per Annex A1
Decision on whether to convert information to an alternate format	17(3)(b)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators Positions as per Annex A1
Decision to refuse to disclose information contained in an exempt bank.	18(2)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP
Decision to refuse access to information that was obtained in confidence from the government of a foreign state or institution, an international organization of states or an institution thereof, the government of a province or institution thereof, a municipal or regional government established by or pursuant to an Act of the legislature of a province or an institution of such a government, or the council, as defined in the Westbank First Nation Self-Government Agreement given effect by the Westbank First Nation Self-Government Act.	19(1)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Regional Privacy Coordinators
Authority to disclose information referred to in 19(1) if the government, organization or institution described in 19(1) consents to the disclosure or makes the information public.	19(2)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Regional Privacy Coordinators
Refuse to disclose information that may be injurious to the conduct of federal-provincial affairs	20	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP
Refuse to disclose information that may be injurious to international affairs or the defence of Canada or one of its allies.	21	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP

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Refuse to disclose information prepared by an investigative body, information injurious to the enforcement of a law, or information injurious to the security of penal institutions	22	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators Positions as per Annex A1
Refuse to disclose information prepared by an investigative body for security clearance.	23	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Regional Privacy Coordinators
Refuse to disclose information that was collected by the Canadian Penitentiary Service, the National Parole Service or the National Parole Board while the individual was under sentence if the conditions in the section are met	24	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Regional Privacy Coordinators
Refuse to disclose information which could threaten the safety of individuals	25	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP
Refuse to disclose information about another individual and shall refuse to disclose such information where disclosure is prohibited under section 8	26	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators Positions as per Annex A1
Refuse to disclose information that is subject to solicitor-client privilege.	27	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Regional Privacy Coordinators
Refuse to disclose information relating to the individual's physical or mental health where the disclosure is contrary to the best interests of the individual	28	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP



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Employment and Social Development Canada

		Senior Public Rights Administrator, ATIP Regional Privacy Coordinators
Receive notice of investigation by the Privacy Commissioner	31	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP
Right to make representations to the Privacy Commissioner during an investigation	33(2)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators
Receive Privacy Commissioner's report of findings of an investigation and give notice of action taken	35(1)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators
Provision of addition information to a complainant after receiving a 35(1)(b) notice.	35(4)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP Senior Public Rights Administrator, ATIP Senior Public Rights Officer, ATIP Public Rights Officer, ATIP Public Rights Analyst, ATIP Regional Privacy Coordinators
Receive Privacy Commissioner's report of findings of investigation of exempt bank	36(3)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP
Receive report of Privacy Commissioner's findings after compliance investigation	37(3)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP
Request that a court hearing, undertaken with respect to certain sections of the Act, be held in the National Capital Region.	51(2)(b)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP
Request and be given right to make representations in section 51	51(3)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer

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hearings		Associate Deputy Minister Corporate Secretary Director, ATIP Managers, ATIP
Prepare annual report to Parliament	72(1)	Deputy Minister Senior Associate Deputy Minister/Chief Operating Officer Associate Deputy Minister Corporate Secretary Director, ATIP

**Annex A1: Positions Delegated in the Regions, as Noted in the Delegation Instrument**

**Atlantic Region**

No additional positions identified.

**Québec Region**

**Figure 5-5**

Title	Position number	Sections
<b>Regional Office</b>		
Project Lead, Access to Information and Privacy (Public Rights)	29737	14, 15, 17(2)(b), 17(3)(b), 22, 26
Advisor, Access to Information and Privacy (Public Rights)	24448	14, 15, 17(2)(b), 17(3)(b), 22, 26

**Ontario Region**

**Figure 5-6**

Title	Position number	Sections
<b>Regional Office</b>		
Access to Information and Privacy (ATIP) Officer	54687	14, 15, 17(2)(b), 17(3)(b), 22, 26, 27, 28
Team Leader	59839	14, 15, 17(2)(b), 17(3)(b), 22, 26, 27, 28
ATIP Officer	40700 (bilingual)	14, 15, 17(2)(b), 17(3)(b), 22, 26, 27, 28
ATIP Officer	54688 (bilingual)	14, 15, 17(2)(b), 17(3)(b), 22, 26, 27, 28
ATIP Officer	53113	14, 15, 17(2)(b), 17(3)(b), 22, 26, 27, 28
ATIP Officer	53112	14, 15, 17(2)(b), 17(3)(b), 22, 26, 27, 28

**Western Canada and Territories Region**

**Figure 5-7**

Title	Position number	Sections
<b>Regional Offices</b>		
Official Languages and Public Rights Officer	67433	14, 15, 17(2)(b), 17(3)(b), 22, 26
Communications Officer	52807	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program Officer	75661	14, 15, 17(2)(b), 17(3)(b), 22, 26
Regional Access to Information and Privacy (ATIP) Officer	49263	14, 15, 17(2)(b), 17(3)(b), 22, 26
<b>Local Offices</b>		
Strategic Planning/Continuous Improvement Consultant	43611	14, 15, 17(2)(b), 17(3)(b), 22, 26
Service Canada Benefit Officer	76691	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	76609	14, 15, 17(2)(b), 17(3)(b), 22, 26
Team Leader	76280	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	69517	14, 15, 17(2)(b), 17(3)(b), 22, 26
Service Canada Benefit Officer	70255	14, 15, 17(2)(b), 17(3)(b), 22, 26
Service Canada Benefit Officer	75411	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	74949	14, 15, 17(2)(b), 17(3)(b), 22, 26

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Program and Service Delivery Clerk	74043	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	74154	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	76079	14, 15, 17(2)(b), 17(3)(b), 22, 26
Service Canada Benefit Officer	71724	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	69487	14, 15, 17(2)(b), 17(3)(b), 22, 26
Service Canada Benefit Officer	66706	14, 15, 17(2)(b), 17(3)(b), 22, 26
Service Canada Benefit Officer	67988	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	48612	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	48127	14, 15, 17(2)(b), 17(3)(b), 22, 26
Team Leader	66148	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	72470	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	52549	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	67205	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	67612	14, 15, 17(2)(b), 17(3)(b), 22, 26
Program and Service Delivery Clerk	75255	14, 15, 17(2)(b), 17(3)(b), 22, 26
Payment Service Officer	68379	14, 15, 17(2)(b), 17(3)(b), 22, 26

## Annex B: Statistical Report on the *Privacy Act*

Figure 5-8



Government  
of Canada

Gouvernement  
du Canada

### Statistical Report on the *Privacy Act*

Name of institution: Employment and Social Development Canada

Reporting period: 4 01 2013 to 31 03 2014

#### PART 1 – Requests under the *Privacy Act*

	Number of Requests
Received during reporting period	7286
Outstanding from previous reporting period	505
<b>Total</b>	<b>7791</b>
Closed during reporting period	7239
Carried over to next reporting period	552

#### PART 2 – Requests closed during the reporting period

##### 2.1 Disposition and completion time

Disposition of requests	Completion Time							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	
All disclosed	476	652	131	10	15	0	0	1284
Disclosed in part	1609	3148	266	53	8	1	0	5085
All exempted	1	3	2	0	0	0	0	6
All excluded	0	0	0	0	0	0	0	0
No records exist	549	176	6	2	0	0	0	733
Request abandoned	91	22	12	4	0	1	1	131
<b>Total</b>	<b>2726</b>	<b>4001</b>	<b>417</b>	<b>69</b>	<b>23</b>	<b>2</b>	<b>1</b>	<b>7239</b>

##### 2.2 Exemptions

Section	Number of requests	Section	Number of requests	Section	Number of requests
18(2)	0	22(1)(a)(i)	1	23(a)	1
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)	31	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	4
19(1)(e)	0	22(2)	0	26	4665
19(1)(f)	0	22.1	10	27	33
20	0	22.2	0	28	2
21	0	22.3	0		

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Employment and Social Development Canada

**2.3 Exclusions**

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

**2.4 Format of information released**

Disposition	Paper	Electronic	Other formats
All disclosed	1269	13	0
Disclosed in part	4641	443	3
<b>Total</b>	<b>5910</b>	<b>456</b>	<b>3</b>

**2.5 Complexity**

**2.5.1 Relevant pages processed and disclosed**

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	37510	33511	1284
Disclosed in part	504401	477469	5085
All exempted	111	0	6
All excluded	0	0	0
Request abandoned	2217	0	131

**2.5.2 Relevant pages processed and disclosed by size of requests**

Disposition	Less than 100 pages processed		101-500 pages processed		501-1000 pages processed		1001-5000 pages processed		More than 5000 pages processed	
	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
All disclosed	1190	17497	92	14262	1	645	1	1107	0	0
Disclosed in part	3526	137382	1456	252869	77	49055	26	38163	0	0
All exempted	5	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Abandoned	128	0	2	0	0	0	1	0	0	0
<b>Total</b>	<b>4849</b>	<b>154879</b>	<b>1550</b>	<b>267131</b>	<b>78</b>	<b>49700</b>	<b>28</b>	<b>39270</b>	<b>0</b>	<b>0</b>

### 2.5.3 Other complexities

Disposition	Consultation required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	2	0	0	975	977
Disclosed in part	17	0	343	4989	5349
All exempted	0	0	0	5	5
All excluded	0	0	0	0	0
Abandoned	1	0	2	114	117
<b>Total</b>	<b>20</b>	<b>0</b>	<b>345</b>	<b>6083</b>	<b>6448</b>

### 2.6 Deemed refusals

#### 2.6.1 Reasons for not meeting statutory deadline

Number of requests closed past the statutory deadline	Principal Reason			
	Workload	External consultation	Internal consultation	Other
279	233	4	5	37

#### 2.6.2 Number of days past deadline

Number of days past deadline	Number of requests past deadline where no extension was taken	Number of requests past deadline where an extension was taken	Total
1 to 15 days	158	12	170
16 to 30 days	48	5	53
31 to 60 days	23	6	29
61 to 120 days	18	3	21
121 to 180 days	10	0	10
181 to 365 days	0	1	1
More than 365 days	0	0	0
<b>Total</b>	<b>257</b>	<b>27</b>	<b>284</b>

### 2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	1	0	1
French to English	0	2	2
<b>Total</b>	<b>1</b>	<b>2</b>	<b>3</b>

### PART 3 – Disclosures under subsection 8(2)

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

**PART 4 – Requests for correction of personal information and notations**

	Number
Requests for correction received	8
Requests for correction accepted	5
Requests for correction refused	1
Notations attached	2

**PART 5 – Extensions**

**5.1 Reasons for extensions and disposition of requests**

Disposition of requests where an extension was taken	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation or conversion
		Section 70	Other	
All disclosed	15	0	0	0
Disclosed in part	121	0	8	2
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	3	0	0	0
Request abandoned	4	0	0	0
<b>Total</b>	143	0	8	2

**5.2 Length of extensions**

Length of extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	1	0	0	0
16 to 30 days	142	0	8	2
<b>Total</b>	143	0	8	2

**PART 6 – Consultations received from other institutions and organizations**

**6.1 Consultations received from other government institutions and organizations**

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during the reporting period	14	1174	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	14	1174	0	0
Closed during the reporting period	14	1174	0	0
Pending at the end of the reporting period	0	0	0	0

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

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	
Disclose entirely	5	4	0	0	0	0	0	9
Disclose in part	5	0	0	0	0	0	0	5
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
<b>Total</b>	10	4	0	0	0	0	0	14

**6.3 Recommendations and completion time for consultations received from other organizations**

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



**PART 7 – Completion time of consultations on Cabinet confidences**

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

**PART 8 – Resources related to the *Privacy Act***

**8.1 Costs**

Expenditures		Amount
Salaries		\$3,600,000
Overtime		\$65,000
Goods and Services		\$340,000
• Contracts for privacy impact assessments	\$0	
• Professional services contracts	\$170,000	
• Other	\$170,000	
<b>Total</b>		<b>\$4,005,000</b>

**8.2 Human Resources**

Resources	Dedicated full-time	Dedicated part-time	Total
Full-time employees	27.30	4.30	31.60
Part-time and casual employees	1.00	0.00	1.00
Regional staff	20.00	3.75	23.75
Consultants and agency personnel	0.85	0.00	0.85
Students	1.00	0.00	1.00
<b>Total</b>	<b>50.15</b>	<b>8.05</b>	<b>58.20</b>

## Additional Reporting Requirements – *Privacy Act*

Figure 5-9

Appendix A										
Previously released ATI package released informally										
Institution						Number of informal releases of previously released ATI packages				
Employment and Social Development Canada						204				
Completed Privacy Impact Assessments (PIAs)										
Institution						Number of Completed PIAs				
Employment and Social Development Canada						10				
Completion Time of Consultations on Cabinet Confidences under the ATIA - Requests with Legal Services										
Number of Days	Fewer Than 100		101–500		501–1,000		1,001–5,000		More Than 5,000	
	Pages Processed		Pages Processed		Pages Processed		Pages Processed		Pages Processed	
	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed
1 to 15	1	69	0	0	0	0	0	0	0	0
16 to 30	3	98	2	431	0	0	0	0	0	0
31 to 60	2	67	0	0	1	491	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
<b>Total</b>	<b>6</b>	<b>234</b>	<b>2</b>	<b>431</b>	<b>1</b>	<b>491</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Completion Time of Consultations on Cabinet Confidences under the ATIA - Requests with Privy Council Office										
Number of Days	Fewer Than 100		101–500		501–1,000		1,001–5,000		More Than 5,000	
	Pages Processed		Pages Processed		Pages Processed		Pages Processed		Pages Processed	
	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	1	41	0	0	0	0	0	0	0	0
31 to 60	6	167	1	146	0	0	0	0	0	0
61 to 120	1	42	0	0	0	0	1	3832	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	3	76	0	0	0	0	0	0
More than 365	0	0	1	228	0	0	0	0	0	0
<b>Total</b>	<b>8</b>	<b>250</b>	<b>5</b>	<b>450</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>3832</b>	<b>0</b>	<b>0</b>

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Completion Time of Consultations on Cabinet Confidences under the PA - Requests with Legal Services										
Number of Days	Fewer Than 100		101-500		501-1,000		1,001-5,000		More Than 5,000	
	Pages Processed		Pages Processed		Pages Processed		Pages Processed		Pages Processed	
	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
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

Completion Time of Consultations on Cabinet Confidences under the PA - Requests with Privy Council Office										
Number of Days	Fewer Than 100		101-500		501-1,000		1,001-5,000		More Than 5,000	
	Pages Processed		Pages Processed		Pages Processed		Pages Processed		Pages Processed	
	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
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

The tables above in Appendix A of the Statistical Report include reporting data under both the *Access to Information Act* and the *Privacy Act* pursuant to 2013-2014 Treasury Board Secretariat reporting requirements.