



# **Privacy Impact Assessment Summary for the Use of the Social Insurance Number as a File Identifier for the Public Service, Canadian Forces and Royal Canadian Mounted Police Pension Plans**

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Utilisation du numéro d'assurance sociale comme identificateur de dossier pour les régimes de pension  
de la fonction publique, des Forces canadiennes et de la Gendarmerie royale du Canada



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## 1. Purpose

This document facilitates the review of the Privacy Impact Assessment prepared on the use of the Social Insurance Number as a file identifier for the administration of the federal pension plans established under the *Public Service Superannuation Act*, the *Canadian Forces Superannuation Act* and the *Royal Canadian Mounted Police Superannuation Act*. This document also reviews the four privacy risk areas identified in the Privacy Impact Assessment, the recommendations to address them, and outlines steps being taken to implement them.

## 2. Description

This Privacy Impact Assessment evaluates whether the use of the Social Insurance Number as a common file identifier for the administration of the Public Service, Canadian Forces and the Royal Canadian Mounted Police pension plans complies with the requirements of the *Privacy Act* and associated Treasury Board Secretariat privacy policies.

The scope of this Privacy Impact Assessment does not encompass any possible changes in the collection of personal information as a result of the Government of Canada Pension Modernization Project that is being implemented by the Department of Public Works and Government Services Canada. The departments of Public Works and Government Services Canada, National Defence and the Royal Canadian Mounted Police who are the organizations responsible for the administration of these programs, will need to re-examine this assessment when changes in the collection, use and sharing of the Social Insurance Number among the pension plans create significant privacy risks.

To provide pension administration services, the plan administrators must ensure that they have the functional and technical ability to do so, and meet all legislative requirements associated with pension administration. One such legislative requirement is to ensure that the total pensionable service credit a plan member can accumulate between the various pension plans, in this case between the *Public Service Superannuation Act*, the *Canadian Forces Superannuation Act* and the *Royal Canadian Mounted Police Superannuation Act*, does not exceed thirty-five years. Another element that is common to two of the pension plans (*Public Service Superannuation Act* and the *Canadian Forces Superannuation Act*) is the Supplementary Death Benefit. Although separate arrangements exist for each plan, a Supplementary Death Benefit participant may only retain coverage under one plan at any given time.

In order to comply with the legislative requirements for these pension plans, a file identifier is required to share limited pension information between the pension plans administrators. The Social Insurance Number is the only file identifier common to all plans.

There is regular movement of personnel within the public service the Canadian Forces and the Royal Canadian Mounted Police and this movement has membership implications for the pension plans established under the *Public Service Superannuation Act*, the *Canadian Forces Superannuation Act* and the *Royal Canadian Mounted Police Superannuation Act*. The Social Insurance Number is needed to exchange information between Public Works and Government Services Canada, the Department of National Defence and the Royal Canadian Mounted Police regarding an employee's pension/benefit administration. It is

mainly needed to confirm and calculate prior service when an employment ceases with one entity (Canadian Forces, Royal Canadian Mounted Police, and the public service) and employment commences with one of the other two.

Other than the Social Insurance Number, there is not an identification number that is common to employees of the public service, members of the Canadian Forces and the Royal Canadian Mounted Police. Each entity utilizes its own unique file identifier to record transactions and services related to individuals' pension and benefit administration. The public service uses the Personal Record Identifier and a superannuation number. The Royal Canadian Mounted Police uses the Regimental Number, and the Canadian Forces uses the Service Number. No one administrator has direct access to another's database or individual records. An individual's Social Insurance Number is the only identifier retained by the public service, the Canadian Forces and the Royal Canadian Mounted Police that will allow for 100% accuracy in identifying affected employees from outside of their original departments.

The use of the Social Insurance Number as a file identifier for these three federal pension plans is essential to accomplish the following:

- confirm contributor status and avoid duplication in pension contributions and benefits payments;
- determine accurate thresholds for pension and benefits purposes and establish accurate termination and retirement dates in particular, the 35-year threshold; and
- determine eligibility for the Supplementary Death Benefit coverage under either the *Public Service Superannuation Act* or the *Canadian Forces Superannuation Act*.

Clearly, the exchange of pension information between administrations is critical to ensure compliance with legislated requirements and to provide effective pension / benefit administration services.

### **3. Why the Privacy Impact Assessment was Necessary**

The Treasury Board Secretariat oversees the insured benefits programs for members of the public service and other government employees.

The Treasury Board Secretariat has received policy authority for the use of the Social Insurance Number as a file identifier for the administration of the pension plans established for the public service, the Canadian Forces and the Royal Canadian Mounted Police.

In compliance with the Treasury Board Secretariat *Directive on the Social Insurance Number*, the President of the Treasury Board requested that a Privacy Impact Assessment be conducted on the use of the Social Insurance Number as a file identifier among the three pension plans administrators namely, Public Works and Government Services Canada, the Department of National Defence and the Royal Canadian Mounted Police before seeking Treasury Board Ministers' authority to add the 3 plans to the list of authorized users of the Social Insurance Number.

## **4. Privacy Impact Assessment Objectives**

- To assess whether the use of the Social Insurance Number as a file identifier for the administration of the public service, Canadian Forces and the Royal Canadian Mounted Police pension plans complies with the requirements of the *Privacy Act* and associated Treasury Board Secretariat privacy policies.
- To resolve any privacy issues that may be of potential public concern (i.e. public service employees, members of the Canadian Forces and Royal Canadian Mounted Police and individuals performing the administration of the three federal pension plans).

## **5. Use and Sharing of the Social Insurance Number – Current Business Process**

This Privacy Impact Assessment involved an analysis of the current business process involving the use and sharing of the Social Insurance Number as a file identifier between Public Works and Government Services Canada, the Department of National Defence and the Royal Canadian Mounted Police for the purpose of the administration of the three federal pension plans. The analysis revealed that the activities involving the use and sharing of the Social Insurance Number revolves around the authentication of employees / members for the purpose of confirming number of years of pensionable service amongst the three federal pension plan. In the case of the public service and the Canadian Forces pension plans, it is also needed to confirm participation to the Supplementary Death Benefit plan.

## **6. Privacy Impact Assessment Findings and Risk Summary**

This Privacy Impact Assessment identified four areas of risk with respect to privacy requirements for the use of the Social Insurance Number as a file identifier for the administration of the public service, the Canadian Forces and Royal Canadian Mounted Police pension plans. Of the four areas of risk, two have been assessed as high-level risks and two as medium-level risks. The areas of risk identified as the following:

- the lack of policy authority for the use of the Social Insurance Number for pension administration (**high-level risk**);
- the lack of formally approved data sharing agreements between the parties, to ensure that the collection, use and sharing of personal information (Social Insurance Number included) between the pension plans, comply with the *Privacy Act* and associated Treasury Board Secretariat privacy policies (**high-level risk**);
- the need to revise Privacy notices on current forms and online applications to inform individuals of the purpose of the collection of the Social Insurance Number in accordance with the requirements of the *Privacy Act* and the Treasury Board Secretariat Directive on the *Social Insurance Number* (**medium-level risk**);
- the need to update all relevant departmental Personal Information Banks to reflect the collection, use and disclosure of the Social Insurance Number among the pension plans (**medium-level risk**).

## 7. Action Plan – Risk Mitigation

- The Treasury Board Secretariat on behalf of Public Works and Government Services Canada, the Department of National Defence and the Royal Canadian Mounted Police has received policy authority to use of the Social Insurance Number as a file identifier for the administration of the three federal pension plans.
- A Data Sharing Agreement between Public Works and Government Services Canada, the Department of National Defence and the Royal Canadian Mounted Police has been drafted. Public Works and Government Services Canada is the lead and will coordinate the finalization of the agreement.
- As a result of receiving policy authority to use the Social Insurance Number, all three organizations will proceed to revise and update their privacy notices on current forms and online applications to inform individuals of the purpose of the collection of the Social Insurance Number in accordance with the requirements of the *Privacy Act* and the Treasury Board Secretariat *Directive on the Social Insurance Number*. All three

organizations will also update and harmonize their Personal Information Banks to reflect the collection, use and disclosure of the Social Insurance Number among the pension plans.

- As an additional point, **the Directive on Privacy Impact Assessment** requires that a summary of the Privacy Impact Assessment be made available to the public, preferably on the Department's website. Because this Privacy Impact Assessment pertains to employees of the public service and members of the Canadian Forces and the Royal Canadian Mounted Police, the summary of the Privacy Impact Assessment will also be posted on Public Works and Government Services Canada, the Department of National Defence and the Royal Canadian Mounted Police websites.

## 8. Security Management

No issues were identified. All users have the necessary clearance to access protected information.

**Date modified:**

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