

CMHC ANNUAL REPORT TO PARLIAMENT

PRIVACY ACT

APRIL 1, 2019 to MARCH 31, 2020

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(i) Introduction

The *Privacy Act* protects the privacy of all Canadian citizens and permanent residents of Canada regarding personal information held by a government institution against unauthorized use and disclosure. The *Privacy Act* also gives Canadians the right to access personal information held by the government.

Preparation and Tabling of the Annual Report

Subsections 72(1) and 72(2) of the *Privacy Act* require that the head of every government institution submit an annual report to Parliament on the administration of the *Privacy Act*. The report must be tabled in both the Senate and the House of Commons on any of the first 15 sitting days on which that house is sitting after September 1 of the year in which the report is prepared. This report describes how Canada Mortgage and Housing Corporation (CMHC) administered the *Privacy Act* in 2019-2020.

Mandate of Canada Mortgage and Housing Corporation

We exist for a single reason: to make housing affordable for everyone in Canada. We know that housing helps people stay employed, do better in school and participate more fully in society. Housing affordability and a stable housing finance system support a stronger, safer Canada where everyone can live with dignity.

CMHC derives its authorities from the *Canada Mortgage and Housing Corporation Act* (CMHC Act) and the *National Housing Act* (NHA). The CMHC Act establishes CMHC as a Crown corporation and sets out the various powers and functions of the company.

Section 3 of the NHA stipulates our mandate which is to “promote housing affordability and choice, to facilitate access to, and competition and efficiency in the provision of housing finance, to protect the availability of adequate funding for housing at low cost, and generally to contribute to the well-being of the housing sector in the national economy.”

(ii) Organizational Structure

We have approximately 2,110 employees and have offices located in Ottawa, Halifax, Montréal, Toronto, Calgary and Vancouver.

During the 2019-2020 reporting year, the Office of the Chief Risk Officer became accountable for providing centralized leadership for Privacy through a “Privacy Office”. The Privacy Office is CMHC’s central authority on all privacy-related matters, including training, and is accountable for overseeing compliance with the *Privacy Act* and the company’s Privacy Program. Its primary objectives are the protection of personal information under the control of the company, decreasing privacy risk exposures and maintaining client and public trust and confidence in our ability to protect their privacy.

The Privacy Office is comprised of a Privacy Officer and a Delegated Privacy Officer, both with delegated authority under the *Privacy Act*, as well as two Senior Privacy Analysts.

The Access to Information and Privacy (ATIP) Office is responsible for handling privacy requests under the *Privacy Act* and complaints filed with the Privacy Commissioner. Two Senior ATIP Analysts report to the Senior Manager, Briefings and ATIP, and a coordinator provides part-time administrative support.

(iii) Delegation Order

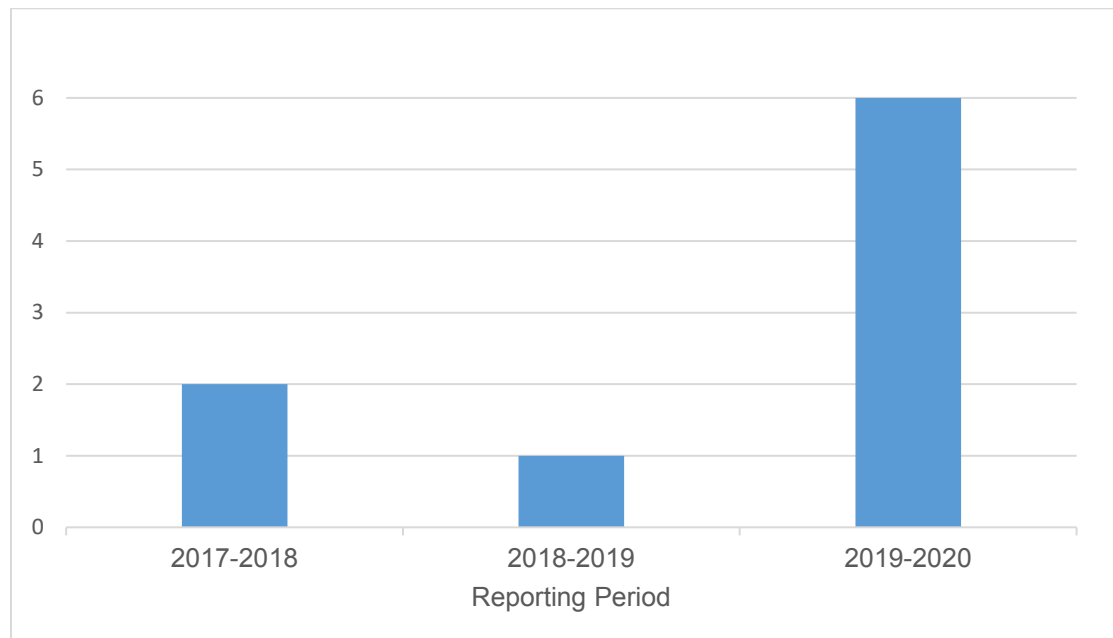
Please refer to Annex A for the Delegation Order.

(iv) Performance 2019-2020

Requests under the Act

During the reporting period, April 1, 2019, to March 31, 2020, we received six new request under the *Privacy Act*, which we completed during the reporting period. Chart 1 provides a comparison of requests received under the Act over the last three reporting periods.

Chart 1: Number of requests received under the *Privacy Act*



Other Requests

The Privacy Office acted as a resource for CMHC staff and offered advice and guidance on the provisions of the legislation. Staff consulted the Privacy Office on issues relating to a range of privacy matters, such as human resource and employee relations and the sharing of information with other government agencies.

Disposition of Completed Requests

One request was disclosed in its entirety; the other five were partly disclosed.

Completion Time and Extensions

Of the requests received, we responded to one request within 15 days; three between 16-30 days; and two within 61-120 days.

Costs

During 2019-2020, we incurred \$325,148 in costs to administer the *Privacy Act*.

Exemptions Invoked

In 2019-2020, we invoked one exemption under the *Privacy Act* in accordance with section 26 to exempt personal information about individuals other than the requester.

Statistical Report

The detailed Statistical Report on the *Privacy Act* is at Annex B

(v) Training and Education

The Privacy Office focused its efforts on embedding a culture of privacy awareness across the company. We promoted Privacy Week in May, and posted privacy awareness ads about the safe use of social media and technology on both CMHC TV and in CMHC's intranet main page, *Agora*.

The Privacy Office held several privacy awareness training sessions across the company to educate employees on privacy requirements and the role everyone plays in protecting privacy.

We conducted two Privacy Impact Assessment (PIA) training sessions that covered when a PIA is required and how to complete CMHC's PIA template. In addition, the Privacy Office trained privacy representatives for each sector on general privacy principles and their privacy roles and responsibilities, including how to complete PIAs.

The table below summarizes the training sessions provided to employees during the reporting period.

Type of training	Number of sessions	Number of employees
Privacy Awareness	3	176
Privacy Impact Assessment	2	52
Privacy Leads / Privacy Impact Assessment	1	16
Total	6	244

The Privacy Office is actively pursuing initiatives to increase visibility, creating awareness tools to provide instructions for staff on how to respond to internal and external requests for access, use and disclosure of personal information.

(vi) Policies, Guidelines, Procedures and Initiatives

(a) Privacy Protocol

During the reporting period, the Privacy Office established two privacy protocols related to the disposition and archiving of documents using RecordPoint as well as for Social Media Monitoring. CMHC is responsible for ensuring that its privacy protocols include all privacy protection procedures that must be followed to manage the collection, use, or disclosure of personal information in order to satisfy the Corporation's obligations under the *Privacy Act*, the *Privacy Regulations*, and the related privacy policy requirements of the Treasury Board of Canada Secretariat (TBS). An effective privacy protocol provides a clear framework that raises the level of privacy awareness at CMHC, with external users and recipients of personal information. It can also clarify the rights and obligations of parties to data sharing agreements involving the disclosure of personal information.

(b) Compliance and Governance

We made significant progress in 2019-2020 to enhance the management of privacy risk and to ensure compliance with the *Privacy Act*:

- We adopted a new governance model to establish clear roles and responsibilities for the Privacy Office and the privacy leads within each sector;
- We implemented a formalized comprehensive Privacy Program including policies, processes, tools (PIAs) and training/awareness;
- We conducted a generally accepted accounting principles (GAAP) analysis to assess the company's privacy maturity and enhancements are continually being made and tracked through formal Management Action Plans which ensure progress within in a timely manner; and
- We reported on all risks, including privacy, to the Board of Directors on a quarterly basis.

(c) Retention and Disposition Schedule

Establishing appropriate retention periods for records is good risk management and both the ATIP Office and the Privacy Office worked with the corporate information management team to improve retention and disposition schedules through modernization of our technology. We completed this work at the end of 2019.

(vii) Summary of Key Issues and Actions Taken on Complaints or Audits

Two new complaints were filed against CMHC with the Privacy Commissioner during the reporting period. Both complaints allege "deemed refusal." Investigations are ongoing.

(viii) Monitoring Compliance

The ATIP Office uses an automated case management solution to monitor processing times for requests and to manage information securely.

The Privacy Office monitors compliance with the Act and completes a Compliance Attestation, on behalf of the company, and provides it to the Board of Directors on yearly basis.

(ix) Privacy Breaches

No material privacy breaches were reported to the Office of the Privacy Commissioner and to the Treasury Board of Canada Secretariat during the reporting period.

(x) Privacy Impact Assessments

We submitted four Privacy Impact Assessments (PIAs) to the Office of the Privacy Commissioner of Canada and the Information and Privacy Policy Division of the Treasury Board of Canada Secretariat in 2019-2020.

These PIAs were for both new and existing programs and services and the risk analysis identified the extent to which these programs and services comply with all privacy principles and where mitigations should be implemented to protect the privacy of individuals in compliance with the *Privacy Act*.

(xi) Public Interest Disclosures

CMHC did not disclose personal information during the 2019-2020 reporting period pursuant to paragraph 8(2)(m).

No data matching activities were undertaken.

The detailed Statistical Report is at Annex B of this report.

(xii) Information Holdings

A description of institutional classes of records and personal information banks for CMHC can be found in the publication [Info Source 2019 - Sources of Federal Government and Employee Information – Canada Mortgage and Housing Corporation](#), available on [CMHC's website](#).

Annex A –Delegation Order

Delegation Order / Décret de délégation

Order Under Section 73 of the *Access to Information Act* and Section 73 of the *Privacy Act*

Pursuant to the authority conferred upon me by Section 73 of the *Access to Information Act* and Section 73 of the *Privacy Act*, I designate the persons holding the positions set out in the attached Schedule, including any person designated in writing to act in the place of the holder of such position, to exercise the powers, duties and perform the functions of the President as the head of a government institution under the Acts as set out in the Schedule opposite each position.

Arrêté en vertu de l'article 73 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*

En vertu de l'autorité que me confère l'article 73 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, les personnes occupant des postes mentionnés à l'annexe ci-joint, y compris une personne désignée par écrit pour agir à la place du titulaire de tel poste, sont autorisées à exercer les pouvoirs et les fonctions ainsi qu'à assumer les attributions qui m'ont été confiées en ma qualité de responsable d'une institution fédérale aux termes des Lois, et énoncés dans l'annexe à l'égard de chaque poste.



President / Président
Canada Mortgage and Housing Corporation
Société canadienne d'hypothèques et de logement

Date: July 9, 2011

Privacy Act

Position	Sections
Chief of Staff	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 14; 15; 17(2)(b); 18(2); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 36(3); 37(3); 51(2)(b); 51(3); 72(1); 77.
Senior Manager, Access to Information and Privacy	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 14; 15; 17(2)(b); 18(2); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 36(3); 37(3); 51(2)(b); 51(3); 72(1); 77.
Director, Compliance and Governance / Privacy Officer	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 19(1); 19(2); 20; 21; 22; 23; 24; 25; 26; 27; 28; 33(2); 35(1); 35(4); 36(3); 37(3); 51(2)(b); 51(3); 72(1); 77.
Senior Specialist, Privacy / Delegated Privacy Officer	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 19(1); 19(2); 20; 21; 22; 23; 24; 25; 26; 27; 28; 33(2); 35(1); 35(4); 36(3); 37(3); 51(2)(b); 51(3); 72(1); 77.
Analyst, Access to Information and Privacy	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 14; 15; 17(2)(b); 18(2); 19(1); 19(2); 20; 21; 22; 23; 24; 25; 26; 27; 28; 31; 33(2); 72(1).

Privacy Act Regulations

Position	Sections
Chief of Staff	7, 9; 11(2); 11(4); 13(1); 14
Senior Manager, Access to Information and Privacy	7, 9; 11(2); 11(4); 13(1); 14
Director, Compliance and Governance / Privacy Officer	7; 9
Senior Specialist, Privacy / Delegated Privacy Officer	7; 9
Analyst, Access to Information and Privacy	7, 9; 11(2); 11(4); 13(1); 14

Annex B – Statistical Report on the *Privacy Act*



Statistical Report on the *Privacy Act*

Name of institution: Canada Mortgage and Housing Corporation

Reporting period: 2019-04-01 to 2020-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	6
Outstanding from previous reporting period	0
Total	6
Closed during reporting period	6
Carried over to next reporting period	0

Section 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	1	0	0	0	0	0	0	1
Disclosed in part	0	3	0	2	0	0	0	5
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	1	3	0	2	0	0	0	6

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	5
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

2.3 Exclusions

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

2.4 Format of information released

Paper	Electronic	Other
2	4	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
3581	2982	6

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	1	12	0	0	0	0	0	0	0	0
Disclosed in part	1	1	3	735	0	0	1	2234	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2	13	3	735	0	0	1	2234	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	4
Percentage of requests closed within legislated timelines (%)	66.7

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
2	2	0	0	0

2.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	0	1	1
16 to 30 days	0	1	1
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	2	2

2.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Section 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Section 4: Requests for Correction of Personal Information and Notations

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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

Number of requests where an extension was taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
2	0	2	0	0	0	0	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	2	0	0	0	0	0	0
31 days or greater								0
Total	0	2	0	0	0	0	0	0

Section 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

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

6.2 Recommendations and completion time for consultations received from other Government of Canada 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	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	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
Total	0	0	0	0	0	0	0	0

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	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	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
Total	0	0	0	0	0	0	0	0

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer 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
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Fewer 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
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
2	0	0	0	2

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed	6
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	81	18	0	0

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

Section 11: Resources Related to the *Privacy Act*

11.1 Costs

Expenditures		Amount
Salaries		\$212,676
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$212,676

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	2.08
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	2.08

Note: Enter values to two decimal places.