

CANADA 
INFRASTRUCTURE BANK

**ANNUAL REPORT TO PARLIAMENT
ON THE *PRIVACY ACT***

APRIL 1, 2018 TO MARCH 31, 2019

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1. Introduction

The purpose of the *Privacy Act* is to protect the privacy of individuals by controlling the way in which federal government institutions collect, use, store, disclose and dispose of personal information. The *Privacy Act* also gives individuals a right of access to personal information about themselves held by a government institution.

Section 72 of the *Privacy Act* requires that the head of every government institution submit an annual report to Parliament on the administration of the *Privacy Act* during the financial year. This report describes how the Canada Infrastructure Bank (“CIB”) administered the *Privacy Act* throughout fiscal year 2018-2019. It covers the reporting period from April 1, 2018 to March 31, 2019 (the “**Reporting Period**”).

2. Mandate of the Canada Infrastructure Bank

The CIB was established in June 2017 as a federal Crown corporation accountable to Parliament. The CIB reports to Parliament through the Minister of Infrastructure and Communities (the designated Minister).

The *Canada Infrastructure Bank Act* sets out CIB’s purpose as follows:

The purpose of the Bank is to invest, and seek to attract investment from private sector investors and institutional investors, in infrastructure projects in Canada or partly in Canada that will generate revenue and that will be in the public interest by, for example, supporting conditions that foster economic growth or by contributing to the sustainability of infrastructure in Canada.

The key functions of the organization are described in the *Canada Infrastructure Bank Act* and relate to acting as a centre of expertise by structuring proposals, negotiating infrastructure investments and attracting private capital; advising government on infrastructure projects; and collecting and disseminating data on the state of infrastructure in Canada to better inform infrastructure investment decisions.

Its mission is to work collaboratively with federal, provincial, territorial, municipal and Indigenous government partners and private and institutional investors to identify projects that meet its mandate, and advise government partners on projects where private sector investors are making significant investments in revenue-generating infrastructure projects. This is done by:

- Engaging public and private sector partners early in the planning and design process;
- Exploring new and innovative approaches to project finance and delivery; and
- Identifying projects where revenue-based business models and significant risk transfer to the private sector is appropriate.

Innovative financing available through the CIB provides an optional tool for government sponsors to further the reach of government support directed to public infrastructure and advance models where users or beneficiaries contribute to funding the project, where it makes sense to do so.

Parliament has authorized \$35 billion over 11 years (to fiscal year-end 2027-28) and the requisite authorities to participate in complex infrastructure deals in new and innovative ways. Over the 11 years, CIB will make at least \$5 billion in investments in projects that are in the public interest in each of the three priority areas: public transit; trade and transportation; and green infrastructure. It can also invest in other areas of infrastructure if they are supported by government policy, and pursue investments in projects across the country.

3. Organizational Structure

The administration of the *Privacy Act* within the CIB is managed by the Legal team, which is responsible for the general counsel and corporate secretary functions of the CIB in addition to leading the corporation's compliance functions as they relate to the laws that apply to its activities. Some of the main activities of the Legal team in respect of access to information and privacy ("**ATIP**") include:

- Responding to all requests and enquiries under the *Access to Information Act* and the *Privacy Act*;
- Providing advice and guidance to employees and officers on ATIP matters;
- Delivering training and awareness on ATIP;
- Developing and implementing policies, procedures and guidelines in support of ATIP legislation; and
- Preparing the Annual Reports to Parliament on the administration of the *Access to Information Act* and the *Privacy Act*.

The role of CIB's ATIP Coordinator is assigned to the General Counsel and Corporate Secretary who is an officer of CIB and reports directly to the Chief Financial Officer and Chief Administrative Officer. The ATIP Coordinator is supported by one full time Deputy Corporate Secretary, with assistance from additional temporary resources as needed. While the CIB was completing its start-up phase, external legal counsel and staff at the CIB Transition Office provided support in the administration of the *Privacy Act*.

4. Delegation Order

For the purposes of section 3 of the *Privacy Act*, the President and CEO of CIB is designated as the "Head" of the institution.

Pursuant to section 73 of the *Privacy Act*, the President and CEO's authority has been delegated to enable the CIB to meet its legislated requirements. The President and CEO has delegated all of his powers and duties under the *Privacy Act* to the General Counsel and Corporate Secretary, who is also the ATIP Coordinator for the CIB. The ATIP Coordinator is the point of contact on issues involving the collection of personal information and privacy.

A copy of the Delegation Order, dated December 19, 2018, is attached as Annex A.

5. Highlights of the Statistical Report

CIB did not receive any requests for personal information under the *Privacy Act* during the Reporting Period. This figure coincides with the historical trend. Since the CIB was established in June 2017, the CIB has not received any requests for personal information under the *Privacy Act*. Moreover, CIB has never conveyed personal information to federal investigative agencies pursuant to the provisions of the *Privacy Act*.

No costs were incurred for the administration of the *Privacy Act*.

Attached as Annex B is a copy of the Statistical Report on the *Privacy Act* that was submitted to the Treasury Board of Canada.

6. Training and Awareness

CIB did not undertake any formal training initiatives during the Reporting Period. However, due to the size of the corporation (roughly 31 employees) relative to its operational demands, the ATIP Coordinator is able to offer 1:1 or small group training and guidance in both official languages as the need arises.

7. Policy, Guidelines, Procedures and Initiatives

During the Reporting Period, CIB's Board of Directors approved *the Code of Conduct for Employees*, which sets out the values and behaviours that CIB expects of its employees and consultants to enhance public confidence in the integrity and accountability of the CIB in pursuing its mandate. CIB promotes the *Code of Conduct for Employees* through various types of awareness communications and training to all employees. The *Code of Conduct for Employees*, together with the *Conflict of Interest Policy for Employees* and the Values and Ethics Code for the Public Sector, forms an integral part of CIB's ethical framework.

CIB also posted an updated privacy notice, which describes the guiding principles applied by CIB to the collection, use, disclosure, retention and disposal of and access to personal information on its website – www.cib-bic.ca.

CIB did not implement any other formal policies, guidelines, procedures or initiatives during the Reporting Period. CIB is establishing policies and procedures, which are expected to be fully developed and implemented before the end of fiscal year 2019-2020 and will comply with the policies regarding privacy practices and privacy protection of the Treasury Board of Canada Secretariat.

8. Summary of Key Issues and Actions Taken on Complaints or Audits

CIB did not receive any complaints under the *Privacy Act*, nor were any privacy audits or investigations conducted against CIB during the Reporting Period.

9. Time Monitoring to Process Requests

CIB did not conduct any monitoring of the time to process privacy requests and requests for the correction of personal information during the Reporting Period.

10. Material Privacy Breaches

No material privacy breaches occurred or were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the Reporting Period.

11. Privacy Impact Assessments

A privacy impact assessment is a formal tool used to identify and mitigate privacy risks for new or modified programs, services or initiatives in an effort to heighten compliance with the *Privacy Act*.

CIB did not initiate any privacy impact assessments and no assessments were submitted to the Treasury Board of Canada Secretariat and the Office of the Privacy Commissioner during the Reporting Period.

12. Public Interest Disclosures

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent. CIB did not make any disclosures of personal information pursuant to subsection 8(2)(m) of the *Privacy Act* during the Reporting Period.

**Subject / Objet : Delegation order under the *Access to Information Act* and the *Privacy Act*
/ Arrêté de déléation en vertu de la *Loi sur l'accès à l'information* et la *Loi sur la protection
des renseignements personnels***

Delegation Order

The President and Chief Executive Officer of the Canada Infrastructure Bank, pursuant to section 73 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the President and Chief Executive Officer as the head of the Canada Infrastructure Bank, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

Dated, at the City of Toronto, this 19th day
of December, 2018



Pierre Lavallée
President and Chief Executive Officer / Président-directeur général

Arrêté de déléation

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*, le Président-directeur général de la Banque de l'Infrastructure du Canada délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions dont il est, en qualité de responsable de la Banque de l'Infrastructure du Canada, investi par les dispositions de la Loi ou de son règlement mentionnées dans l'annexe en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

Fait à la ville de Toronto, le 19e jour de
décembre 2018

Schedule / Annexe		
Position / Poste	<i>Access to Information Act and Regulations / Loi sur l'accès à l'information et Règlement</i>	<i>Privacy Act and Regulations / Loi sur la protection des renseignements personnels et Règlement</i>
General Counsel and Corporate Secretary / Avocat général et secrétaire de la Société	Full authority / Autorité absolue	Full authority / Autorité absolue



Pierre Lavallée
President and Chief Executive Officer / Président-directeur général



Statistical Report on the *Privacy Act*

Name of institution: Canada Infrastructure Bank

Reporting period: 2018-04-01 to 2019-03-31

Part 1: Requests Under the *Privacy Act*

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

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	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
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	0	0	0	0	0	0	0	0

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	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	28	0
21	0	22.3	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

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
Total	0	0	0

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	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	0	0	0

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	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	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	0	0	0	0	0	0	0	0	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 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
0	0	0	0	0

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	0	0	0
16 to 30 days	0	0	0
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	0	0

2.7 Requests for translation

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

Part 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

Part 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

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	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	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
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

Part 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
Pending at the end of the 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							
	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	Total
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

Part 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

Part 8: Complaints and Investigations Notices Received

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

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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Part 10: Resources Related to the Privacy Act

10.1 Costs

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

10.2 Human Resources

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

Note: Enter values to two decimal places.