

ANNUAL REPORT ON THE ADMINISTRATION OF THE

PRIVACY ACT

FOR THE PERIOD
APRIL 1, 2022 TO MARCH 31, 2023

Privacy Act

Pursuant to section 72 of the *Privacy Act* (the Act), Farm Credit Canada (FCC) has prepared for submission to Parliament the Annual Report on the administration of this Act for the reporting period of 2022-2023.

Introduction

FCC is a financially self-sustaining federal commercial Crown corporation reporting to Canadians and Parliament through the Minister of Agriculture and Agri-Food. FCC was established through an act of Parliament, the Farm Credit Canada Act. FCC provides financing and other services to about 102,000 customers. FCC's more than 2,300 employees operate from 103 offices located primarily in rural Canada, with the corporate office located in Regina, Saskatchewan.

Purpose of the Privacy Act

The purpose of the Act is to protect the privacy of individuals with respect to their personal information held by federal government institutions. It also provides individuals with a right of access to their personal information.

Mandate of FCC

FCC's mandate is to enhance rural Canada by providing specialized and personalized business and financial services and products to farming operations, including family farms, and to those businesses in rural Canada, including small and medium-sized businesses, that are business related to farming. The primary focus of the activities of the corporation shall be on farming operations, including family farms.

Organizational Structure

The Privacy & Access to Information team is part of the Law and Corporate Secretary division. This division reports to the Vice-President, Law & Corporate Secretary, who was delegated authority and responsibility by the Head (Chair of the Board) for the administration of the Act. A copy of the Delegation Order is included following this report.

A restructuring of the division took place during the fourth quarter of the reporting period resulting in an increase in approved full-time positions from three to six, and the creation of a Manager position reporting to a Senior Director. The three new positions will be accounted for in the 2023-2024 Annual Report.

Performance 2022-2023

In the fiscal year 2022-2023, FCC has not received any formal requests for information under the *Privacy Act*. None of the formal requests were carried over from the previous reporting period. No formal requests were carried over to the next reporting period.

In addition to formal requests for access to personal information, FCC routinely processes informal requests for personal information as part of our ongoing engagement with FCC customers. Notwithstanding the informality around the initiation of such requests, FCC has processed them in accordance with the spirit of the Act.

FCC received eleven informal requests which were processed in the spirit of the *Privacy Act* in 2021-2022. Four of these informal requests were completed in 2022-2023 within 1-30 days, four were completed between 31 and 60 days, and one was completed between 61 to 120 days. Two informal requests were carried over to the next reporting period.

No consultation requests were received under the *Privacy Act*.

In accordance with the Canada Revenue Agency's (CRA) authorities under the *Income Tax Act*, FCC granted the CRA access to its records five times.

FCC does not have any open complaints related to the *Privacy Act*.

FCC continued to meet its obligations under the Act in the context of COVID-19 measures.

FCC's 2022-2023 Statistical Report on the *Privacy Act* is attached.

Training and Awareness

FCC builds awareness and compliance to the *Privacy Act* into all areas of the company's operations, including online services. Training of Privacy and Access to Information team staff, as well as communications and training for all staff and management, continues to be a priority. For example, in 2022-2023 FCC launched new online privacy fundamentals e-learning for its employees. In addition, 10 virtual team-specific training sessions focused on access and privacy were provided throughout the year.

Additionally, policies and procedures for handling personal information as well as organizational communications relating to FCC's privacy compliance obligations to reinforce awareness, have been provided to employees through a variety of channels throughout the 2022-23 fiscal year.

Policies, Guidelines, Procedures, and Initiatives

FCC works to continuously improve its privacy and information practices and policies. The 2022-23 fiscal year afforded an opportunity to update organizational policies, procedures and guidelines including enhancements to address the work-from-home and hybrid work experience of personnel resulting from the pandemic.

FCC launched a review of the Privacy Policy, and supporting instruments, including: a procedure related to Completing Form 8353 Records Inventory, Consent to Use of Personal Information procedure, Protecting Personal Information Used in Reporting Analytics procedure, Retaining Information procedure, Sending Personal Confidential Information procedure, and Storing FCC information procedure. Also, FCC developed standards for the Management of Expressed Consent, and Storage of Digital Records, and supporting instruments this fiscal year.

Complaints and Appeals

No complaints have been filed with the Office of the Privacy Commissioner of Canada.

Monitoring Compliance

No tracking of the time spent processing applications was conducted during the reporting period.

Material Privacy Breaches

Of the privacy incidents reported to FCC's Privacy and Access Office, for the period April 1, 2022 to March 31, 2023, none were assessed as a material privacy breach. As a result, no material privacy breaches have been reported to the Office of the Privacy Commissioner of Canada or the Treasury Board of Canada Secretariat.

Privacy Impact Assessments

One Privacy Impact Assessment was completed in 2022-2023

DocuSign PIA: This PIA was completed internally in the 2021-22 fiscal year. Final submissions to the OPC took place in 2022-23 fiscal year. This PIA was completed for the system FCC uses to electronically sign documents.

<https://www.fcc-fac.ca/en/about-fcc/governance/transparency/info-source.html>

ZScaler PI: This PIA was sent to TBS March 2023, and later approved in August 2023. This PIA was completed for the system FCC uses as a technological product to support our daily workings.

Public Interest Disclosures

There were no disclosures of information under paragraph 8(2)(m) of the Act during the reporting period.

Privacy Act

Designation Order

I, JANE HALFORD, Board Chair of Farm Credit Canada “FCC”, hereby revoke all previous designations relating to the exercise of powers and performance of duties and functions as the head of a government institution under the *Privacy Act* (the “Act”), and by this Order hereby designate the person holding the position of Vice-President and Corporate Secretary, currently MEGAN DOLO as Chief Privacy Officer (and in that person’s absence, the person holding the position of Senior Legal Counsel and Privacy Officer, currently JOSH MacFADDEN), to exercise the powers and perform the duties and functions as the head of a government institution under section 73 the *Act*.

Dated this 19 day of July, 2020.

A handwritten signature in black ink, appearing to read 'Jane Halford', written in a cursive style.

JANE HALFORD, FCC Board Chair

Statistical Report on the *Privacy Act*

Name of institution: Farm Credit Canada (FCC)

Reporting period: 2022-04-01 to 2023-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period		0
• Carried over within legislated timeline	0	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		11
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		11
Closed during reporting period		9
Carried over to next reporting period		2

2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	10
Mail	1
In person	0
Phone	0
Fax	0
Total	11

2.3 Completion time of informal requests

Completion Time							
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
0	4	4	1	0	0	0	9

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
7	378	2	379	0	0	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.1 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

3.2 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	27.1	0
21	0	22.3	0	28	0
		22.4	0		

3.3 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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	0	0	0	0	0

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper and e-record formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	0

3.5.2 Relevant pages processed by request disposition for paper and e-record formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
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

3.5.3 Relevant minutes processed and disclosed for audio formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

3.5.7 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

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

3.7 Deemed refusals

3.7.1 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
0	0	0	0	0

3.7.2 Request 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 timeline 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

3.8 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 4: 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 5: 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 6: Extensions

6.1 Reasons for extensions

Number of extensions 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 ConfidenceSection (Section 70)	External	Internal	
0	0	0	0	0	0	0	0	0

6.2 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 ConfidenceSection (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

Section 7: Consultations Received From Other Institutions and Organizations

7.1 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 within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

7.2 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	
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
Total	0	0	0	0	0	0	0	0

7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

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	
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
Total	0	0	0	0	0	0	0	0

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		100-500 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

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 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 9: Complaints and Investigations Notices Received

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

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

Number of PIAs completed	1
Number of PIAs modified	0

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	15	0	0	0
Central	0	0	0	0
Total	15	0	0	0

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

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

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	120
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Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures	Amount
Salaries	\$196,103
Overtime	\$0
Goods and Services	\$25,425
• Professional services contracts	\$25,425
• Other	\$0
Total	\$221,528

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	2.000
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	3.000
Students	0.000
Total	5.000

Note: Enter values to three decimal places.



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