



NATIONAL CAPITAL COMMISSION
COMMISSION DE LA CAPITALE NATIONALE

Annual Report to Parliament

PRIVACY ACT

APRIL 1, 2024 TO MARCH 31, 2025

Canada



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INTRODUCTION

The *Privacy Act* gives Canadian citizens and people present in Canada the right to have access to information about them that is held by the federal government. It also protects against unauthorized disclosure of that personal information. In addition, it strictly controls how the government will collect, use, store, disclose, and dispose of any personal information. This annual report to Parliament was prepared and shall be tabled in accordance with section 72 of the *Privacy Act*.

The National Capital Commission (NCC) is a Crown corporation that was created by Parliament in 1959 as the steward of federal lands and buildings in the National Capital Region. The corporation is responsible for planning, as well as taking part in the development, conservation and improvement of the National Capital Region. The NCC is governed by a national board of directors. The NCC reports to Parliament through the minister of Government Transformation, Public Works and Procurement.

The *National Capital Act* defines the NCC's mandate. The NCC fulfills its mandate through the following areas of activity:

- setting the long-term planning direction for federal lands in the National Capital Region;
- regulating the use and development of federal lands in the National Capital Region;
- managing, conserving and protecting NCC assets (including Gatineau Park, the Greenbelt, urban parks, real property, and other assets such as bridges, pathways and parkways); and
- maintaining heritage sites in the National Capital Region, such as the official residences and commemorative sites.

ORGANIZATIONAL STRUCTURE

The Access to Information and Privacy (ATIP) Office is part of the NCC's Public, Legal and Corporate Affairs Branch (PLCA). It is responsible for the administration of the *Access to Information Act* and the *Privacy Act* for the corporation. The senior manager of ATIP acts as the institutional coordinator and is assisted by four ATIP analysts and one part-time consultant.

The ATIP Office ensures that the NCC meets its legislated obligations in replying to requests with support from a network of ATIP branch representatives in each of the corporation's program areas.

The NCC was not party to any service agreements pursuant to section 73.1 of the *Privacy Act*.

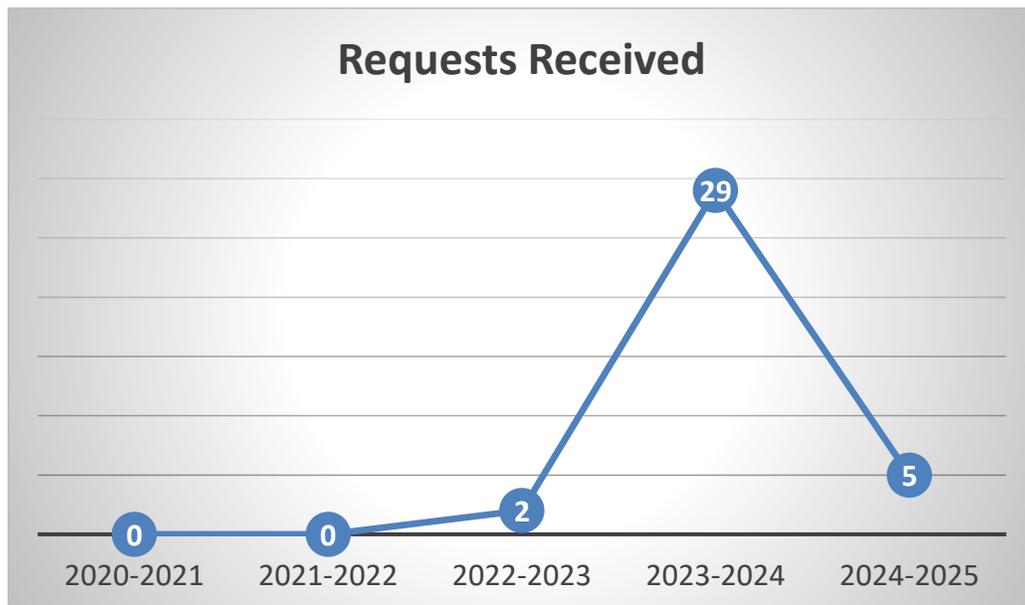
STATISTICS

The following statistics describe the administration of the *Privacy Act* within the NCC for the period of April 1, 2024, to March 31, 2025, as detailed in the attached Appendix A.

Requests Processed Under the *Privacy Act*

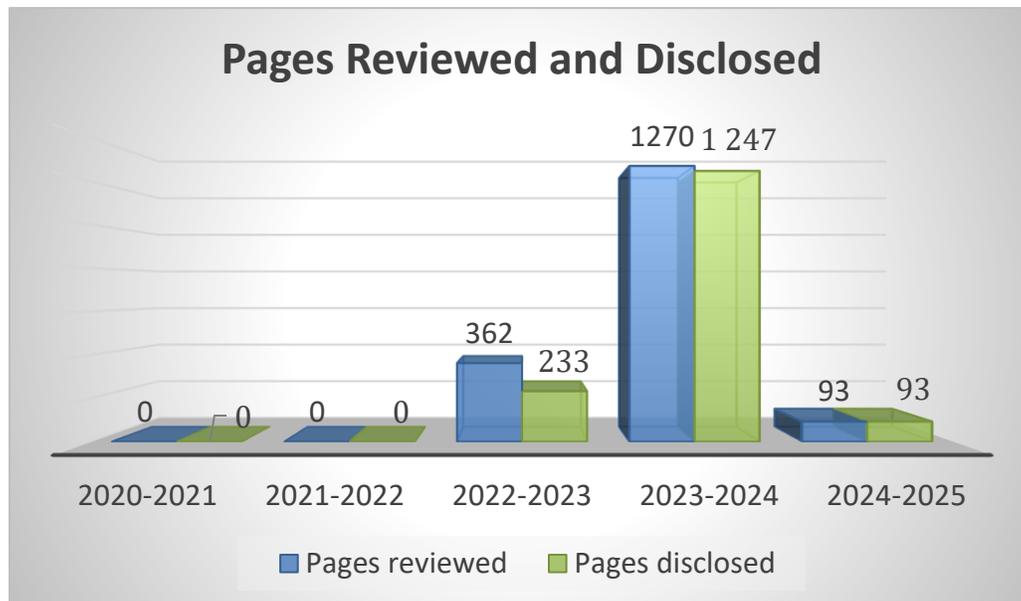
There were no outstanding requests from previous reporting periods. During the reporting period, the NCC received five requests, and these were all closed before the end of the fiscal year and no extension was invoked for any of the requests. No requests were carried forward to the next fiscal year.

Since the 2020–2021 fiscal year, the NCC has received 36 *Privacy Act* requests. The number of pages reviewed and pages disclosed have varied significantly in the past fiscal years. There is no trend or event that explains this fluctuation.





The NCC responded to all requests within the legislated timeframe, being 100% compliant. The records were provided electronically for three requests, and the requests were all closed within 30 days of being received. One request was abandoned by the applicant while no records existed for another.



Consultations completed for other institutions

This is not applicable as no requests were processed.

Exemptions Invoked

It was necessary to invoke exemptions and release only part of the records for one of the five privacy requests that were closed. Exemptions were invoked to protect information about individuals other than the requester.

INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

An audit was completed to assess the adequacy and effectiveness of the NCC's management control framework for the collection, use, retention and disposal of personal information in fiscal year 2023–2024. The ATIP office accepted all the recommendations. The main recommendations included an update of the privacy breach process, clarifying roles and responsibilities regarding the management of privacy impact assessments, improving the delivery of training to NCC staff and updating privacy notices to ensure proper consent is obtained when collecting personal information. All the recommendations were implemented with the development of appropriate tools, guidelines and policies.

The NCC has evaluated the different options to change its ATIP processing system, as it will no longer be supported by the vendor after June 2026. The choice of the replacement system will be finalized in the first quarter of fiscal year 2025–2026.

INSTITUTIONAL POLICIES AND PROCEDURES

The NCC has several Corporate Administrative Policies and Procedures (CAPPs). Specifically, the CAPP on privacy helps to ensure that the NCC fulfills its obligations under the *Privacy Act*.

This policy provides guidance to employees with respect to the application of the *Privacy Act*, and outlines the responsibilities of the Executive Management Committee, senior managers, branch representatives, managers and employees. The update of this 2019 policy was completed during the reporting period.

DELEGATION OF AUTHORITY

The chairperson of the NCC is designated as head of the institution by virtue of the "*Privacy Act* Heads of Government Institutions Designation Order (SI/83-114, as amended)." The chairperson is responsible for administering the *Privacy Act*.

The chairperson has delegated the authority under the *Privacy Act* to key officials within the organization in accordance with subsection 73(1) of the *Privacy Act*.

The chief executive officer, the vice-president of the PLCA Branch and the senior manager of ATIP have complete delegated authority. The ATIP analysts have limited delegation for the application of specific exemptions.

A copy of the delegation order, signed on December 19, 2024, is attached for reference (see Appendix B).

EDUCATION AND TRAINING

ATIP awareness/information sessions are offered in both official languages to NCC employees at large. The Canada School of Public Service Access to Information and Privacy online course is mandatory and was completed by 109 new employees, representing a 100% completion rate. Training modules were developed for specific areas, including privacy breaches and the requirements for privacy risk assessments. These modules will be delivered to employees in the next fiscal year.

ATIP staff with functional responsibilities are encouraged to participate in Treasury Board Secretariat Privacy (TBS) training, but the main methods of delivery are informal briefings and one-on-one training on the *Privacy Act*, its regulations and TBS directives. They also normally participate in TBS community meetings and special events on specific subjects.

COMPLAINTS AND INVESTIGATIONS

No complaints were received during the reporting period. No outstanding complaints remained from the current or previous reporting periods.

PRIVACY IMPACT ASSESSMENT

One privacy impact assessment (PIA) was completed for the [Presence in the Workplace](#) program during the reporting period. In alignment with the Treasury Board Secretariat's *Directive on Prescribed Presence in the Workplace* and to support workspace optimization efforts, the NCC has implemented a new workplace booking tool, which may also be used to monitor employee attendance onsite. A PIA was conducted to evaluate and mitigate privacy risks associated with the process of verifying employee attendance.

Summaries of the PIAs conducted by the NCC are posted on the institution's website at the following address: ncc-ccn.gc.ca/privacy-at-the-ncc.

MONITORING OF COMPLIANCE

The ATIP staff and the ATIP coordinator regularly monitored the time taken to process active privacy requests and met weekly to review all active requests. No consultations were necessary to process the requests received. No trend can be established to make the personal information available through other means than through formal requests. Each request is assessed on a case-by-case basis by the ATIP analysts to determine if consultations with other institutions are necessary.

The NCC includes in its contracts generic provisions related to the collection, use, control, retention, and communication of personal information, as well as audit rights to enable the NCC to verify compliance with these provisions.

PRIVACY BREACHES

No material privacy breaches were reported to the Privacy Commissioner or to the Treasury Board Secretariat for the current reporting period.

PUBLIC INTEREST DISCLOSURES

No personal information was disclosed under paragraph 8(2)(m) for the current reporting period.

COSTS TO ADMINISTER THE *PRIVACY ACT*

Costs associated with the administration of the *Privacy Act* are related to processing requests and providing advice and guidance on matters pertaining to the collection, use, disclosure, retention and disposal of personal information. A total of 0.744 full-time equivalents were used to administer the *Privacy Act* throughout the NCC. Salaries and administration costs amounted to \$98,090.

APPENDIX A



Statistical Report on the *Privacy Act*

Name of institution: National Capital Commission

Reporting period: 2024-04-01 to 2025-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		5
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		5
Closed during reporting period		5
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	4
E-mail	1
Mail	0
In person	0
Phone	0
Fax	0
Total	5

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	1
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	3	0	0	0	0

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
93	93	4

3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset 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	2	5	0	0	0	0	0	0	0	0
Disclosed in part	1	88	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	1	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	4	93	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

3.5.7 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	5
Percentage of requests closed within legislated timelines (%)	100

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

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	10	1	1	8
Central	0	0	0	0
Total	10	1	1	8

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	1
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Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries		\$54 107
Overtime		\$2 442
Goods and Services		\$41 541
• Professional services contracts	\$41 037	
• Other	\$504	
Total		\$98 090

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0,500
Part-time and casual employees	0,000
Regional staff	0,000
Consultants and agency personnel	0,244
Students	0,000
Total	0,744



Supplemental Statistical Report on the *Access to Information Act* and the *Privacy Act*

Name of institution: National Capital Commission

Reporting period: 2024-04-01 to 2025-03-31

Section 1: Requests Carried Over and Active Complaints Under the *Access to Information Act*

1.1 Requests carried over to next reporting period, broken down by reporting period received

Reporting Period Requests Carried Over Were Received	Requests Carried Over that are <i>Within</i> Legislated Timelines as of March 31, 2025	Requests Carried Over that are <i>Beyond</i> Legislated Timelines as of March 31, 2025	Total
Received in 2024-25	13	8	21
Received in 2023-24	1	19	20
Received in 2022-23	0	1	1
Received in 2021-22	0	0	0
Received in 2020-21	0	9	9
Received in 2019-20	0	2	2
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16 or earlier	0	0	0
Total	14	39	53

1.2 Active complaints with the Information Commissioner of Canada, broken down by reporting period received

Reporting Period Active Complaints Were Received by Institution	Number of Active Complaints
Received in 2024-25	2
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16 or earlier	0
Total	2

Section 2: Requests Carried Over and Active Complaints Under the *Privacy Act***2.1 Requests carried over to next reporting period, broken down by reporting period received**

Reporting Period Requests Carried Over Were Received	Requests Carried Over that are <i>Within</i> Legislated Timelines as of March 31, 2025	Requests Carried Over that are <i>Beyond</i> Legislated Timelines as of March 31, 2025	Total
Received in 2024-25	0	0	0
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16 or earlier	0	0	0
Total	0	0	0

2.2 Active complaints with the Privacy Commissioner of Canada, broken down by reporting period received

Reporting Period Active Complaints Were Received by Institution	Number of Active Complaints
Received in 2024-25	0
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16 or earlier	0
Total	0

Section 3: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in 2024-25?	No
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Section 4: Universal Access under the Privacy Act

How many requests were received from foreign nationals outside of Canada in 2024-25?	0
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APPENDIX B

Delegation Order / Arrêté de délégation

***Access to Information Act and Privacy Act /
Loi sur l'accès à l'information et de la Loi sur la Protection des renseignements personnels***

In accordance with Section 73 of the *Access to Information Act* and of the *Privacy Act*, the Chairperson of the National Capital Commission hereby delegates authority granted for the provisions of these *Acts* as indicated below. Any prior Delegation Orders are hereby revoked.

Conformément à l'article 73 de la *Loi sur l'accès à l'information* et de la *Loi sur la Protection des renseignements personnels*, le président de la Commission de la capitale nationale délègue, par le présent, l'autorité prévue dans les articles de ces *Lois*, ci-dessous mentionnés. Tous les arrêtés préalablement en vigueur sont révoqués.

Position/Poste	Provisions of the <i>Access to Information Act</i> / Articles de la <i>Loi sur l'accès à l'information</i>	Provisions of the <i>Privacy Act</i> / Articles de la <i>Loi sur la Protection des renseignements personnels</i>
Chief Executive Officer / Premier dirigeant	Full authority/Autorité absolue	Full authority/Autorité absolue
Vice President, Public, Legal and Corporate Affairs /Vice-président, Affaires publiques, juridiques et d'entreprise	Full authority/Autorité absolue	Full authority/Autorité absolue
Chief, Access to Information and Privacy (ATIP) / Chef, Accès à l'information et la protection des renseignements personnels (AIPRP)	Full authority/Autorité absolue	Full authority/Autorité absolue
Senior Analyst, ATIP / Analyste principal, AIPRP (RE-05)	Act / Loi: 4(2.1), 7, 8(1), 9, 10, 11(2), 24(1), 25, 26, 27(1), (4), 33, 44(2), 35(2)(b) Regulations / Règlements: 6(1)	15, 17(2)(b), 26, 33(2)
Analyst, ATIP / Analyste, AIPRP (RE-04)	Act / Loi: 8(1), 9, 27(1), (4), 33, 35(2)(b) Regulations / Règlements: 6(1)	15, 17(2)(b), 33(2)
Director AREE and Chief Audit Executive / Directeur ARÉE et dirigeante de l'audit interne	10(2), 16.5	22.3

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 Maryse Gaudreault
 Chairperson/Présidente

2024-déc.-19

 Date