

ANNUAL REPORT ON THE ADMINISTRATION OF THE

# PRIVACY ACT

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FOR THE PERIOD  
APRIL 1, 2023, TO MARCH 31, 2024

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# 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 2023-24.

## Privacy Act

The Act protects the privacy of individuals with respect to their personal information. The Act governs the federal government's collection, retention, use and disclosure of that information. It also provides individuals with a right of access to their personal information.

## Introduction and mandate of FCC

FCC is a federal 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 non-financing services to about 103,032 customers across the country. FCC's more than 2,500 employees operate from 104 offices located primarily in rural Canada, with the head office located in Regina, Saskatchewan.

FCC's mandate is to support agriculture and agri-food and our aspiration is to help the industry succeed as a global leader in food security and sustainable food production by driving innovation and being a catalyst for value creation in the ecosystem. In addition to delivering on our core business, we fulfil our mandate by: advancing innovation and opportunities for under-represented groups in Canadian agriculture and agri-food; delivering products to make intergenerational transfers easier and help young and new farmers entering the industry; and partnering with customers and industry to work toward achieving climate and sustainability goals.

## Organizational structure

The Privacy and Access to Information team is part of FCC's Law and Corporate Secretary division. At March 31, 2024, this division reported to the Chief Financial Officer through the Vice-President, Law and Corporate Secretary. A copy of the Delegation Order signed by the head of the institution (Chair of the Board) in effect at the end of the reporting period is included in this report.

The Privacy and Access team is comprised of four full-time positions, in addition to a Manager position reporting to a Senior Director. The four positions include a Technician, two Specialists and a Senior Specialist. During the last reporting period, FCC engaged with two consultants to assist with the build out and enhancement of FCC's Privacy program.

FCC was not party to an agreement, as described under Section 73.1 of the Act, during the reporting period.

## Performance 2023-24

In the fiscal year 2023-24, FCC received seven formal requests for information under the Act, with one request being carried into the next reporting period. All requests were completed within legislated timeframes. Of the completed requests, 33.33% of requests were "all disclosed," 50% were "disclosed in part" and 21.77% were "abandoned."

FCC completed four formal requests within 16-30 days and two within 31-60 days.

FCC received eight informal requests, which were processed in the spirit of the Privacy Act. Of those eight requests, four were completed within 0-15 days, one within 16-30 days, two within 31-60 days, and one within 61-120 days.

No consultation requests were received under the Privacy Act.

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

FCC's 2023-24 Statistical Report on the Privacy Act can be found within this report.

## 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.

The Privacy and Access to Information team performed three divisional-specific training events

related to both privacy and access to information last reporting period. In addition, the Privacy and Access to Information team participated in a broader corporate online training campaign on information risk. The team was involved in the creation of content within topics such as:

- Create, collect and classify
- Store, use and share
- Disposing of information
- Reporting privacy incidents

### **Policies, guidelines, procedures and initiatives to improve privacy**

During the reporting period, FCC launched a Privacy program initiative with a goal of building or enhancing all elements of a solid Privacy program for a government institution governed by the Privacy Act: a risk-based approach, and addressing gaps identified in the operations of FCC as part of the review and mapping of the legal obligations emanating from the Act, Regulations and Treasury Board Secretariat Instruments. A roadmap and project plan to March 31, 2025, has been developed and approved by FCC senior management. At March 31, 2024, the initiative is underway.

Among the deliverables (completed or ongoing) identified in the roadmap: a Program Privacy policy was developed and approved; Program procedures are under development; an Assessing Privacy Risks and Impacts guide; development and rollout of a new privacy impact assessment (PIA) Triage Request form; development and rollout of PIA templates; building of a Personal Information (PI) inventory; and consequential creation/revision of personal information banks (PIBs).

Additional initiatives to assist FCC with further maturing the Access to Information and Privacy (ATIP) program include onboarding with the ATIP software called Amanda, working with Canada Revenue Agency (CRA) to create a new portal where CRA requests can be transmitted securely (still in progress), and onboarding to ATIP Online.

### **Complaints and appeals**

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

### **Monitoring compliance**

FCC monitors the time taken to process the Act requests through the Amanda software via a time take and time allowed dashboard for every request. This is monitored by each Privacy and Access to Information Specialist.

FCC does not monitor frequently requested types of personal information as FCC customers have access to their personal information within the FCC Online Services portal. Outside of that avenue, there is no frequently requested personal information; most requests are specific to the customer's unique circumstances. The Manager of the Privacy and Access to Information program reviews and approves all Privacy Requests prior to release. The FCC standard Professional Services Agreement and General Contracts include a clause advising FCC is governed by the Privacy Act, and further elaborates the information contained within the contract may, if required, be disclosed under the authority of the Access to Information Act and Privacy Act. The agreement and contracts are signed by service providers external to FCC, and the head, or delegate, of the business unit within FCC.

### **Material Privacy breaches**

Of the privacy incidents reported to FCC's Privacy and Access to Information team for the period April 1, 2023, to March 31, 2024, 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**

There were no PIAs completed during the reporting period.

### **Public interest disclosures**

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

**Farm Credit Canada – Delegation of powers, duties and functions**

- I. Delegation of Authority: Delegation of powers, duties and functions of the Head of the institution pursuant to section 73(1) of the Privacy Act and Regulations.

Privacy Act		CEO	VP, Law & CS	Senior Director, ERCP	Manager, Privacy & Access to Information Program
8(2)(j)	Disclosure for research purposes	X	X	X	X
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X	X	X	
8(4)	Copies of requests under 8(2)(a) to be retained	X	X	X	X
8(5)	Notice of disclosure under 8(2)(m)	X	X	X	
9(1)	Record of disclosures to be retained	X	X	X	X
9(4)	Consistent uses	X	X	X	
10	Personal information to be included in personal information banks	X	X	X	X
14	Notice where access requested	X	X	X	X
15	Extension of time limits	X	X	X	X
16	Where access is refused	X	X	X	X

Privacy Act		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
17(2)(b)	Language of access	X	X	X	X
17(3)(b)	Access to personal information in alternative format	X	X	X	X
18(2)	Exemption (exempt bank) – Disclosure may be refused	X	X	X	X
19(1)	Exemption – Personal information obtained in confidence	X	X	X	X
19(2)	Exemption – Where authorized to disclose	X	X	X	X
20	Exemption – Federal-provincial affairs	X	X	X	X
21	Exemption – International affairs and defence	X	X	X	X
22	Exemption – Law enforcement and investigation	X	X	X	X
21	Exemption – Advice, etc.	X	X	X	X
22	Exemption – Testing procedures, tests and audits	X	X	X	X
22.3	Exemption – Public Servants Disclosure Protection Act	X	X	X	X

Privacy Act		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
23	Exemption – Security clearances	X	X	X	X
24	Exemption – Individual's sentenced for an offence	X	X	X	X
25	Exemption – Safety of individuals	X	X	X	X
26	Exemption – Information about another individual	X	X	X	X
27	Exemption – Protected information – solicitors, advocates and notaries	X	X	X	X
27.1	Exemption – Protected information – patents and trade-marks	X	X	X	X
28	Exemption – Medical record	X	X	X	X
33(2)	Right to make representation	X	X		
35(4)	Access to be given	X	X		
51(2)(b)	Special rules for hearings	X	X		
72(1) (4)	Report to Parliament	X	X	X	

Privacy Regulations		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
9	Reasonable facilities and time provided to examine personal information	X	X	X	X
11(2)	Notification that correction to personal information has been made	X	X	X	X
11(4)	Notification that correction to personal information has been refused	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requestor	X	X	X	
14	Disclosure of personal information relating to physical or mental health may be made to a requestor in the presence of a qualified medical practitioner or psychologist	X	X	X	

- I. Designation – ATIP Coordinator: The Manager, Privacy & Access to Information Program is designated Access to Information and Privacy Coordinator for the purpose of administering the day-to-day activities of the Privacy Act.
- II. Designation – Chief Privacy Officer: The Vice-President, Law & Corporate Secretary is designated Chief Privacy Officer for the purpose of developing, implementing and reporting on FCC's Privacy & Access to Information Program.
- IV. All current delegations of authority and designations executed by the Chairperson of the

Board of Directors of FCC in the capacity of the Head of the corporation are replaced by this Delegation of powers, duties and functions.



Jane Halford  
Chairperson of the Board of Directors

Date July 12, 2023



Government  
of Canada      Gouvernement  
du Canada

## Statistical Report on the Privacy Act

Name of institution: Farm Credit Canada (FCC)

Reporting period: 2023/04/01 to 2024/03/31

### Section 1: Requests Under the Privacy Act

Reporting period:

#### 1.1 Number of requests received

		Number of Requests
Received during reporting period		7
Outstanding from previous reporting periods:		0
▪ Outstanding from previous reporting period	0	
▪ Outstanding from more than one reporting period	0	
Total		7
Closed during reporting period		6
Carried over to next reporting period		1
▪ Carried over within legislated timeline	1	
▪ Carried over beyond legislated timeline	0	

#### 1.2 Channels of requests

Source	Number of Requests
Online	1
Email	5
Mail	1
In person	0
Phone	0
Fax	0
Total	7

## Section 2: Informal requests

### 2.1 Number of informal requests

	Number of Requests
Received during reporting period	8
Outstanding from previous reporting periods	1
▪ Outstanding from previous reporting period	1
▪ Outstanding from more than one reporting period	0
<b>Total</b>	<b>9</b>
Closed during reporting period	8
Carried over to next reporting period	1

### 2.2 Channels of informal requests

Source	Number of Requests
Online	0
Email	8
Mail	0
In person	0
Phone	0
Fax	0
<b>Total</b>	<b>8</b>

### 2.3 Completion time of informal requests

Completion Time							
0 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
4	1	2	1	0	0	0	8

### 2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1,000 Pages Released		1,001-5,000 Pages Released		More Than 5,000 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	62	1	302	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
	0 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	2	0	0	0	0	0	2
Disclosed in part	0	1	2	0	0	0	0	3
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	1	0	0	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	4	2	0	0	0	0	6

#### 3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
22(2)	0	22(1)(e)(i)	0	23(a)	0
22(1)(e)(ii)	0	22(1)(e)(iii)	0	23(b)	0
22(1)(e)(iv)	0	22(1)(e)(v)	0	24(a)	0
22(1)(e)(vi)	0	22(1)(b)	0	24(b)	0
22(1)(e)(vii)	0	22(1)(c)	0	25	0
22(1)(e)(viii)	0	22(2)	0	26	3
22(1)(f)	0	22.1	0	27	0
30	0	22.2	0	27.1	0
31	0	22.3	0	28	0
		22.4	0		

#### 3.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
22(1)(a)	0	22(1)	0	22(1)(c)	0
22(1)(b)	0	22(1)(e)	0	22(1)(d)	0
22.1	0	22(1)(b)	0	22(1)(f)	0
		22(1)(c)	0	22.1	0

#### 3.4 Format of information released

Paper	Electronic				Other
	E-record	Dataset	Video	Audio	
2	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
596	534	6

##### 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		501-1,000 Pages Processed		1,001-5,000 Pages Processed		More Than 5,000 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	1	1	1	166	0	0	0	0	0	0
Disclosed in part	3	55	1	374	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	56	2	540	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	Interagency Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	1	0	0	0	1
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	1	0	0	0	1

## 3.6 Closed requests

### 3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	6
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 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 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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

**3.8 Requests for translation**

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

**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
<b>Total</b>	<b>0</b>

## 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 Confidence Section (Section 70)	External	Internal	
2	2	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 Confidence Section (Section 70)	External	Internal	
1 to 15 days	2	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	2	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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
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
	0 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	0
Disclose in part	0	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

### 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
	0 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	0
Disclose in part	0	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 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		501-1,000 Pages Processed		1,001-5,000 Pages Processed		More than 5,000 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 Privacy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 Pages Processed		501-1,000 Pages Processed		1,001-5,000 Pages Processed		More than 5,000 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	0
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 DPC	0

### 11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	68
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## Section 12: Resources Related to the Privacy Act

### 12.1 Allocated Costs

Expenditures	Amount
Salaries	\$25,016
Overtime	\$0
Goods and Services	\$885
▪ Professional services contracts	\$885
▪ Other	\$0
<b>Total</b>	<b>\$25,881</b>

### 12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.380
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.440
Students	0.000
<b>Total</b>	<b>0.820</b>

Note: Enter values to three decimal places.



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