Housing, Infrastructure and Communities Canada | Logement, Infrastructures et Collectivités Canada



2025–2026

Housing, Infrastructure and Communities Canada

Annual Report on the Administration of the *Privacy Act*

Canada

1. Introduction

Purpose of the *Privacy Act*

The *Privacy Act* establishes obligations on federal government institutions to respect the privacy rights of individuals by limiting the collection, use and disclosure of personal information. It also provides individuals with the right of access to their personal information and the right to request the correction of that information.

In accordance with section 72 of the *Privacy Act,* this annual report detailing the administration of the Act was prepared and tabled in Parliament.

This annual report describes how Housing, Infrastructure and Communities Canada (HICC) administered the *Privacy Act* from April 1, 2025, to March 31, 2026.

Mandate of Housing, Infrastructure and Communities Canada

Housing, Infrastructure and Communities Canada's policies, programs and investments help build sustainable, inclusive and climate-resilient communities while addressing challenges Canadians face every day, including access to:

- safe and affordable housing;
- modern and accessible public transit;
- climate-resilient infrastructure to protect communities in the face of climate change;
- safe and clean water; and
- inclusive cultural and recreational community spaces.

HICC does this by:

- investing in housing and infrastructure that fosters more inclusive and sustainable Canadian communities and supporting efforts to prevent and eliminate chronic homelessness;
- collaborating with all orders of government, Indigenous communities and key stakeholders to create world-class, modern public infrastructure, reliable public transit systems and affordable housing;
- working with Indigenous partners, Crown corporations, other levels of government and the private sector to address housing needs and deliver major infrastructure projects, and leveraging alternative financing and investment options to promote economic growth;
- supporting climate-ready structural and natural infrastructure projects to mitigate the impacts of natural disasters triggered by climate change and help communities adapt and build resilience; and

- conducting research and economic analysis and collecting data to identify community priorities and supporting long-term planning toward a net-zero, low-carbon and climate-resilient future.

HICC did not have any wholly owned subsidiaries at any time during the reporting period.

2. Organizational structure

How HICC is organized to fulfill its *Privacy Act* responsibilities

The Minister of Housing and Infrastructure is the head of the institution under the Act.

The Minister is supported by the Deputy Minister, Assistant Deputy Ministers, the Chief Executive Officer, Build Canada Homes, which operated as a Special Operating Agency within HICC during the reporting period, the Director General of Communications and Corporate Affairs, and the Chief Audit and Evaluation Executive. Their teams work in collaboration with the Access to Information and Privacy (ATIP) Office headed by the Director, ATIP and Executive Correspondence to ensure the legislative requirements are met.

Structure of the ATIP Office

The ATIP Office at HICC is led by the Director of ATIP and Executive Correspondence, who, at fiscal year end, reported to the Director General of Communications and Corporate Affairs.

At the end of the reporting period, the ATIP Office was comprised of 10 members: the Director, three team leaders and six ATIP analysts between the ATIP Operations and the Privacy Policy teams.

HICC follows the hybrid work model. While onsite, most employees work in the Ottawa office, with one employee working in the Montréal office. The ATIP Office did not have any consultants during fiscal year 2025–2026.

The work of the ATIP Office under the Act involves:

- processing *Privacy Act* requests and related activities;
- processing consultations received from other institutions;
- providing advice and guidance to employees and senior officials on privacy-related matters;
- developing privacy-related instruments to ensure sound privacy management practices and clearly defined responsibilities throughout the Department;
- developing and delivering training to departmental employees; and

- representing HICC in engagements with the Treasury Board of Canada Secretariat (TBS), the Office of the Privacy Commissioner of Canada and other government institutions regarding the application of the ATIP legislation.

There was no new or pre-existing service agreement under section 73.1 of the *Privacy Act* to which HICC was party during this reporting period.

3. Delegation order

The delegation order in effect at the end of this reporting period was signed in January 2025. Under this order, full authority to exercise the powers, duties and functions for all sections of the Act was delegated to all Assistant Deputy Ministers, the Chief Audit and Evaluation Executive, the Director of ATIP and Executive Correspondence, and the vacant Manager of ATIP position. Some authority was delegated to the ATIP team leaders.

A copy of the signed and dated delegation order can be found in Annex A of this report.

4. Performance overview 2025–2026

The *Statistical Report on the Privacy Act* is prepared by government institutions to assist TBS in analyzing trends and exercising oversight. The analysis in this section compares data found in HICC's *2025–2026 Statistical Report on the Privacy Act* with data from the three previous fiscal years to produce a four-year trend analysis.

Percentage of requests responded to within legislated timelines

One of the key measures of HICC ATIP's performance is the number of requests closed within legislated timelines. In 2025–2026, HICC closed all 14 privacy requests within the statutory timelines achieving a compliance rate of 100%. This marks the fourth consecutive fiscal year in which HICC has maintained a perfect compliance record. These results demonstrate the organization's continued commitment to timely responses and exemplary performance in meeting its obligations under privacy legislation. Table 1 compares the number of requests closed within legislated timelines for the past four fiscal years.

Table 1: Number and percentage of requests responded to within legislated timelines

Requests responded to within legislated timelines	2022–2023	2023–2024	2024–2025	2025–2026
Number of requests closed	2	27	22	14
Number of requests closed within legislated timelines	2	27	22	14
Percentage of requests closed within legislated timelines	100%	100%	100%	100%

Number of completed requests broken down by completion times

Section 14 of the *Privacy Act* requires institutions to provide a response to the requester within 30 days of receipt of the request or to notify the requester that an extension is required. Of the 14 requests completed during the reporting period, 10 (71.4%) were completed within one to 30 days, and four requests (28.6%) were completed within 31 to 60 days. For a comparison of processing times over the past four fiscal years, please refer to Table 2 below.

Table 2: Number of completed requests broken down by completion times

Processing time	Number of requests			
	2022–2023	2023–2024	2024–2025	2025–2026
1 to 30 days	2	23	15	10
31 to 60 days	0	4	7	4
61 to 120 days	0	0	0	0

Overview of active requests broken down by specific fiscal year in which they were received

At the end of the fiscal year, no active requests received in 2025–2026 were carried forward into 2026–2027 and the one request from the previous fiscal year was closed within this reporting period. HICC consistently strives to meet the legislated timelines by concentrating efforts to expedite the retrieval of records and effectively coordinate consultations with stakeholders.

Overview of active complaints broken down by fiscal year in which they were received

In 2025–2026, HICC did not receive any new complaints and had no active complaints with the Office of the Privacy Commissioner of Canada at the end of the reporting period.

Reasons for extensions

The Act recognizes that some requests may require more than 30 days to process. Therefore, section 15 of the Act allows institutions to extend the time limit by a maximum of 30 days. In 2025–2026, three extensions were taken under 15(a)(i) and one extension was taken under 15(a)(ii) of the Act. Table 3 shows the reasons for extensions over the past four fiscal years.

Table 3: Information on reasons for extensions

Reasons for extensions	2022–2023	2023–2024	2024–2025	2025–2026
Interference with operations 15(a)(i)	0	4	7	3
Consultations 15(a)(ii)	0	4	0	1
Translation or conversion 15(b)	0	0	0	0

Consultations from other government institutions and organizations

When other institutions and organizations retrieve information that concerns or originates from HICC in response to *Privacy Act* requests, they may consult the HICC ATIP Office for recommendations on release. Other government institutions are defined as federal institutions subject to the Act. Other organizations include the governments of provinces, territories and municipalities, and of other countries.

In 2025–2026, HICC did not receive any consultation requests.

Percentage of completed requests for which records were all disclosed and disclosed in part

During the reporting period, HICC disclosed in part four privacy requests (29%) and disclosed in full three requests (21%). No records existed for four requests (29%) and the remaining three requests (21%) were abandoned by the requester. Table 4 compares the percentage of requests all disclosed and disclosed in part for the past four fiscal years.

Table 4: Percentage of completed requests all disclosed and disclosed in part

Completed requests	2022–2023	2023–2024	2024–2025	2025–2026
Percentage of requests all disclosed	0 (0%)	7 (26%)	3 (14%)	3 (21%)
Percentage of requests disclosed in part	1 (50%)	18 (67%)	15 (68%)	4 (29%)
Total	**1 (50%)**	**25 (93%)**	**18 (82%)**	**7 (50%)**

Other performance information

Informal requests

An informal request is defined as a request for personal information made to the HICC ATIP Office that is either not made or not processed under the Act. Informal requests include formal requests that were discontinued in favour of providing information informally. HICC processed 18 informal requests for previously released personal information and disclosed 1,033 pages, compared to no requests in the previous fiscal year.

5. Training and awareness

Institution-specific training was offered in a variety of formats to best suit the needs of employees across the Department. Employees are encouraged to complete the Canada School of Public Service (CSPS) course titled “Access to Information and Privacy Fundamentals” prior to

attending any HICC internal training sessions. This CSPS course is on HICC's mandatory training list, and it must be completed within six months of the start date of employment with HICC, and/or when beginning a supervisor, manager or executive role. As set out in the Directive on Personal Information Requests and Correction of Personal Information and in accordance with HICC's policy, the mandatory training requirements are monitored directly by the employee's manager and by the Corporate Learning Team.

During 2025–2026, the HICC training course "Processing ATIP Requests" was added to the mandatory training list for all HICC employees. All new employees are required to complete the course upon joining the Department, and all employees must renew their training every three years to ensure continued awareness of access to information obligations and consistent application of ATIP requirements across the organization.

The ATIP Office offered and delivered "Processing ATIP Requests" and the institution-specific privacy training in both official languages three times per year to all HICC employees and customized group sessions, as requested, to maintain consistent and up-to-date approaches to privacy functions across the Department.

During 2025–2026, six sessions of the 60-minute "Processing ATIP Requests" were delivered by the ATIP Office to 549 employees. The ATIP Office also hosted an "ATIP training for executives" with 17 attendees. Both courses contained a privacy component.

As part of HICC's internal Privacy Policy, all employees must attend privacy training every three years. In 2025–2026, six sessions of the 60-minute institution-specific privacy training were delivered to a total of 523 employees. These sessions covered and ensured employees were aware of policies, procedures and legal responsibilities under the *Privacy Act*.

The high attendance rates at HICC are attributed to the mandatory nature of the training, continued advertising of the trainings through department-wide calendar invitations and the ease of attending the training virtually.

In addition to the general ATIP training, ad hoc privacy training was provided to 55 employees across two sessions on Microsoft Teams. These training sessions were tailored to meet the specific content needs of attendees. Ad hoc training on privacy considerations for the use of videorecording and transcription was also delivered throughout the fiscal year to a total of 72 employees across 26 sessions.

The ATIP Office maintains an internal webpage which includes resources on the HICC Privacy Policy, the HICC Directive on Privacy Practices, principles of privacy protection, privacy breach management and frequently asked questions.

The ATIP Office publishes articles related to privacy in the internal departmental newsletter. This reporting period, the ATIP Office published articles regarding the implications of artificial

intelligence (AI) on privacy, and how to handle privacy breaches. These articles included key considerations and best practices to protect privacy when using AI in the workplace, and the TBS requirements regarding the handling and reporting of privacy breaches.

The ATIP Office ensures that all employees are informed of any updates to privacy policies and directives related to the administration of the Act through regular internal newsletter articles, updating our internal-facing ATIP INFRAnet page and engaging with employees who have functional or delegated responsibilities under the Act to provide targeted guidance and advice as needed.

Lastly, employees in the ATIP Office who have functional and delegated responsibilities under the Act and its associated Regulations regularly participate in training and information sessions offered by TBS and the ATIP community to keep up to date on policies and procedures related to the administration of the Act and ensuring they participate in ongoing in-depth training.

6. Policies, guidelines and procedures

During the 2025–2026 fiscal year, the ATIP Office developed guides for the use of the new request processing software to support analysts as they adapted to the new workflow used by the system. These guides included useful details covering the entire lifespan of a request including file opening, record retrieval, triaging, correspondence, consultations, record processing and closing. Additional guides were developed to support the generation of weekly reports for management and for custom reports.

The ATIP Office also transitioned its privacy policy file management system to SharePoint, resulting in a more streamlined and efficient process.

The ATIP Office continued to update privacy policies, guidelines and procedures, and ensured alignment with TBS updates made during this reporting period. Specifically, HICC's Directive on Privacy Practices was updated in October 2025 in response to the revisions to the TBS Directive on Privacy Practices.

HICC Privacy Policy and Directive on Privacy Practices include plans and guidance on how to address privacy breaches at HICC. The Directive includes definitions, containment measures, notification requirements, details about privacy breach investigations reporting, and record keeping requirements. These instruments support a consistent and effective approach to privacy protection and are reviewed periodically to ensure they remain current and aligned with legislative and operational requirements.

The ATIP Office continues to collaborate with HICC Procurement Services and the branches responsible for rolling out new initiatives to ensure appropriate privacy protections are included in contracts, agreements and arrangements. In response to the Treasury Board Secretariat's revisions to the Policy on Privacy Protection and the Directive on Privacy Practices,

HICC Procurement Services updated its processes to align with the new TBS direction. Contracts involving personal information are flagged to the ATIP Office at the earliest stage possible to assist in mitigating privacy risks for new initiatives and ensuring that relevant privacy clauses are included in contracts.

HICC did not have any new collections or new consistent uses of Social Insurance Numbers that began during this reporting period.

7. Initiatives and projects to improve privacy

HICC implemented initiatives to improve access to personal information and privacy within the institution, including technological improvements to modernize the delivery of services and facilitate the processing of requests.

HICC transitioned to a new request processing software for the start of fiscal year 2025–2026. This software continues to improve the overall efficiency of ATIP Operations, reduce the administrative burden on the ATIP Office and improve overall processing times. It also features an electronic document review functionality which is used to quickly filter, sort and de-duplicate documents, including emails and other file types.

The ATIP Office continues to use its generic inbox for the Privacy Policy Team to improve the efficiency and effectiveness of operations. This has streamlined the triage of privacy policy inquires away from the ATIP Operations inbox and ensures inquiries can be actioned more quickly and securely by the Privacy Policy Team.

Collaboration between the ATIP Office and the Data Science Team allowed for privacy considerations to be integrated into departmental AI projects, including the establishment of an AI governance platform.

HICC continues to utilize its Privacy Policy to outline privacy considerations on the use of video recording and transcription on MS Teams. This ensures that employees are aware of their obligations under the Act prior to the collection of personal information. HICC Information Technology (IT) Services periodically reviews and removes access permissions for employees who have the video recording and transcription feature enabled on Microsoft Teams (when no longer needed).

The HICC ATIP Office takes privacy breaches very seriously. Training and guidance on how to mitigate and manage privacy breaches is available to all employees via the HICC Directive on Privacy Practices, as well as during formal training courses. Following a confirmed privacy breach, it is HICC's practice to recommend that all employees involved in the breach attend a privacy training course to better understand their role in protecting personal information and preventing future breaches. The ATIP Office tracks and analyses the types of privacy breaches

that have occurred in our institution to find trends and implement targeted solutions to prevent similar breaches.

The ATIP Office works in collaboration with Information Management (IM) on an ongoing email cleanup campaign across the Department, which encourages staff to take time to review their email inbox on a regular basis and sort out the emails of business value from the transitory information. The IM landing page is available for employees to review policies and directives related to email management and access tools to help maintain a tidy inbox. This helps to ensure that personal information of a transitory nature is not kept longer than necessary.

HICC is committed to privacy practices that advance Indigenous reconciliation, including removing barriers to personal information for Indigenous requesters by responding to requests in a timely manner, providing interim responses for large volume requests, processing a large variety of document formats, keeping open lines of communication with requesters and applying limited exemptions to the records. In alignment with the Access to Information and Privacy Implementation Notice 2023-01: Advancing Reconciliation with Indigenous Peoples by Providing Culturally Appropriate Services, HICC included the recommended courses in the learning and development plans for the entire ATIP team, and the training is mandatory for all new members of the ATIP Office.

8. Summary of key issues and actions taken on complaints

No complaints were received or concluded during the reporting period.

9. Material privacy breaches

A privacy breach is defined by TBS as the improper or unauthorized access to creation, collection, use, disclosure, retention or disposal of personal information. A material privacy breach is defined by TBS as a privacy breach that could reasonably be expected to create a real risk of significant harm to an individual.

During the reporting period, no material privacy breaches were reported to TBS and the Office of the Privacy Commissioner.

10. Privacy impact assessments

Privacy impact assessments (PIAs) are risk management tools to determine whether privacy risks are present in new or existing departmental programs, initiatives or projects that collect, use and retain personal information. PIAs promote transparency and accountability and contribute to continued public confidence in the way the Government manages personal information. HICC conducts PIAs to develop an informed assessment of the privacy risks associated with new initiatives and to inform recommendations to mitigate any identified privacy risks to an acceptable level.

During the reporting period, five new PIAs were completed and no PIAs were substantially modified.

A PIA on the Security Screening Portal was completed, a software solution developed and used by Innovation, Science and Economic Development to streamline the security screening process. The portal replaces the existing system used to transmit security screening documentation to the Canadian Security Intelligence Service.

A PIA on the Accessibility Hub (the Hub) was completed, which advocates for accessibility and provides employees with disabilities and their managers with support, guidance and resources related to accessibility and the duty to accommodate. The Hub has also helped accelerate the implementation of HICC's Accessibility Plan by collaborating closely with partners across the Department to become accessible by default and inclusive by design, in order to realize a barrier-free Canada by 2040.

A PIA was completed on the Automation of HICC Organizational Charts, which supports the creation and maintenance of organizational charts that outline reporting relationships and departmental roles. Historically, HICC created organizational charts manually. To enhance efficiency, HICC is now implementing OrgChart, an automation software that integrates with the Government of Canada's standardized human resource management system, MyGCHR. This integration will enable HICC to generate real-time, dynamic organizational charts.

A PIA was completed on the HybridApp, a personal attestation tool that allows employees to share their weekly in-office presence with their manager. The application was created to help managers monitor the minimum onsite requirements of employees as outlined in the HICC hybrid work requirements and in alignment with the Treasury Board of Canada Secretariat Direction on prescribed presence in the workplace.

A PIA was completed on LinkedIn Recruiter, a tool used to support talent acquisition within HICC. The platform assists recruitment efforts by helping identify individuals with the skills, expertise, and experience required to fill hard-to-fill or specialized positions, while also supporting initiatives to address employment equity gaps.

All HICC PIA summaries are available online here: Privacy Impact Assessment Summaries.

11. Public interest disclosures

Paragraph 8(2)(m) permits the disclosure of personal information where, in the opinion of the head of the institution, the public interest in disclosure clearly outweighs any invasion of privacy that could result from the disclosure, or the disclosure would clearly benefit the individual to whom the information relates. No disclosure was made under paragraph 8(2)(m) of the *Privacy Act* during the reporting period.

12. Monitoring compliance

HICC makes every effort to meet statutory deadlines and actively monitors the time taken to process requests. Monitoring begins as soon as a request is received by the ATIP Office, entered into the case management system and assigned to an ATIP analyst. Deadlines are tracked and monitored electronically, highlighting files nearing completion or targeted deadlines. The analysts and management monitor the time taken to process personal information requests on an ongoing basis. Statistics on the active caseload are provided to, and analyzed by, the Director of ATIP and Executive Correspondence on a weekly basis. Any required action is taken as a result of this analysis to ensure timely access to documents requested.

Instrumental to ensuring HICC's compliance with the legislation, the ATIP Office maintained positive working relationships with the employees tasked with the retrieval of records by engaging in early discussions of requests, providing guidance and following up as needed.

Annexes

Annex A: *Privacy Act* Delegation Order

Annex A

Privacy Act Delegation Order

Access to Information Act **and** ***Privacy Act*** **Delegation Order /Arrêté de délégation en vertu de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels***

The Deputy Minister of Housing, Infrastructure and Communities, pursuant to section 95(1) of the *Access to Information Act* and section 73(1) 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 Deputy Minister as the head of Housing, Infrastructure and Communities Canada under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

En vertu de l'article 95(1) de la *Loi sur l'accès à l'information* et de l'article 73(1) de la *Loi sur la protection des renseignements personnels*, le sous-ministre de Logement, Infrastructures et Collectivités 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 Logement, Infrastructures et Collectivités Canada, investi par les dispositions de la Loi ou de son règlement mentionnées en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

Schedule / Annexe

Position / Poste	*Access to Information Act* and Regulations / *Loi sur l'accès à l'information* et Règlement	*Privacy Act* and Regulations / *Loi sur la protection des renseignements personnels* et Règlement
Assistant Deputy Ministers / Sous-ministres adjoint(e)s	Full authority / Autorité absolue	Full authority/ Autorité absolue
Chief Audit and Evaluation Executive / Dirigeant(e) principal(e) de la vérification et de l'évaluation	Full authority / Autorité absolue	Full authority / Autorité absolue
Director, ATIP and Executive Correspondence/ Directeur (trice) de l'AIPRP et de la correspondance de la haute direction	Full authority / Autorité absolue	Full authority / Autorité absolue
Manager, ATIP (PM-06)/ Gestionnaire de l'AIPRP (PM-06)	Full authority / Autorité absolue	Full authority / Autorité absolue
ATIP Team Leader (PM-05) / Chef d'équipe de l'AIPRP (PM-05)	*Access to Information Act* / *Loi sur l'accès à l'information* • 4(2.1), 7, 8(1), 9, 11(2) Access to Information Regulations / Règlement sur l'accès à l'information • 6(1), 8	*Privacy Act/ Loi sur la protection des renseignements personnels* • 14, 15 Privacy Regulations / Règlement sur la protection des renseignements personnels • 9

Paul Halucha
Deputy Minister of Housing, Infrastructure and Communities
Sous-ministre de Logement, Infrastructures et Collectivités

January 7, 2025
Date