

Canada Mortgage and Housing Corporation

**ANNUAL REPORT TO PARLIAMENT**

***PRIVACY ACT***

**APRIL 1, 2015**

**MARCH 31, 2016**

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## **1. About the Corporation**

### **(i) Introduction**

The *Privacy Act* protects the privacy of all Canadian citizens and permanent residents of Canada regarding personal information held by a government institution against unauthorized use and disclosure. The *Privacy Act* also gives Canadians the right to access personal information held by the government.

Section 72 of the *Privacy Act* requires that the head of every government institution submit an annual report to Parliament on the administration of the *Act* during the financial year. This report describes how Canada Mortgage and Housing Corporation (CMHC) administered the *Privacy Act* throughout fiscal year 2015-2016.

### **(ii) Mandate of Canada Mortgage and Housing Corporation (CMHC)**

Canada Mortgage and Housing Corporation derives its authorities from the *Canada Mortgage and Housing Corporation (CMHC) Act* and the *National Housing Act* (NHA). The *CMHC Act* established CMHC as a Crown corporation and set out the various powers and functions of the Corporation.

The NHA provides CMHC with its mandate which, pursuant to section 3, is to “promote housing affordability and choice, to facilitate access to, and competition and efficiency in the provision of housing finance, to protect the availability of adequate funding for housing at low cost, and generally to contribute to the well-being of the housing sector in the national economy.”

### **(iii) Administration**

The *Access to Information and Privacy* (ATIP) Office, located at CMHC's National Office in Ottawa, processes all formal requests under the *Access to Information Act* and the *Privacy Act*. The Corporation has approximately 1,900 employees on staff located at National Office, the Regional Business Centres in Halifax, Montréal, Toronto, Calgary and Vancouver, and in the field offices.

The Assistant Corporate Secretary and Director, ATIP is the *Access to Information and Privacy* Coordinator. The day to day responsibilities under the Acts are delegated to the ATIP Officer which supports this function.

### **(iv) Training and Education**

During this reporting period the ATIP Office provided 3 English and 1 French customized training sessions to a total of 70 employees in Insurance Servicing, First Nation Housing and Human Resource Business Partnership. The training served to inform and, for many, enhance employee awareness of CMHC's access and privacy governance structure and accountability for access and privacy. It also provided information on existing Treasury Board Guidelines, Policies and Directives on the application of the *Access to Information Act* and the *Privacy Act* as well as CMHC's Policy Suite on Privacy (Privacy Framework, PIA and Breach Protocols).

**(v) Implementation of Institution-Specific Policies**

In fiscal year 2015-2016, CMHC's ATIP Office developed a training plan on Privacy and Privacy Awareness on a risk-based approach. The primary goal of the training is to enhance the knowledge, skills and perspective of all employees. Through regular awareness and refresher training sessions, the ATIP office aims to ensure that staff and managers understand their roles and responsibilities with respect to access to information and privacy.

During the reporting period, in compliance with Treasury Board of Canada Secretariat's "Info Source Decentralized Publishing Requirements", CMHC self-published, in both official languages, an updated *Info Source* Chapter on the Canada Mortgage and Housing Corporation website.

**(vi) Monitoring Reports**

The ATIP Office uses an automated case management solution to monitor the time to process the *Privacy* requests. This software provides CMHC with a flexible and easy-to-use system to manage requests for information and record project details in a secure environment.

**(vii) Privacy Breaches**

No material privacy breaches occurred during the reporting year.

**(viii) Information Holdings**

A description of institutional classes of records and personal information banks for CMHC can be found in the publication *Info Source - Sources of Federal Government and Employee Information – Canada Mortgage and Housing Corporation*, situated on CMHC's website at:

[http://www.cmhc.ca/en/corp/about/upload/Info\\_Source\\_2015\\_EN\\_w\\_ACC.pdf](http://www.cmhc.ca/en/corp/about/upload/Info_Source_2015_EN_w_ACC.pdf)

**(ix) Reading Room**

The Legal Library has been designated as a public reading room and is available to individuals wanting to review CMHC publications and other public materials. The Legal Library is located at National Office at:

Canada Mortgage and Housing Corporation  
700 Montreal Road  
Ottawa, Ontario K1A 0P7  
Telephone Number: (613) 748-2367

Additional reading rooms are available at each of CMHC's Regional Business Centres.

## **2. Report on the *Privacy Act***

### **(i) Requests under the Act**

During the reporting period, April 1, 2015 to March 31, 2016, the ATIP Office received a total of 2 new requests under the *Privacy Act*. Both requests were completed during the reporting period.

### **(ii) Other Requests**

The ATIP Office also acted as a resource for CMHC officials and offered advice and guidance on the provisions of the legislation. The ATIP Office was consulted and provided opinions on issues relating to a range of privacy matters, such as human resource issues and the sharing of information with other government agencies.

In addition, numerous e-mails and telephone calls from applicants were redirected to informal routes in order to obtain the information requested.

### **(iii) Disposition of Completed Requests**

For both requests completed in 2015-2016, the disposition was as follows:

- 1 disclosed in part
- 1 abandoned

### **(iv) Completion Time and Extensions**

Of the 2 requests completed in 2015-2016, 1 was responded to within 42 days with a 30 day extension and the other was abandoned after 28 days.

### **(v) Exemptions Invoked**

In 2015–2016, the ATIP Office invoked only 2 exemptions pursuant to specific sections of the *Privacy Act*. The exemption was as follows:

- Section 26: Exempting personal information about individuals other than the requestor
- Section 27: Solicitor-client privilege

### **(vi) Complaints and Investigations**

No complaints were received for the 2015-2016 reporting period.

### **(vii) Disclosure under 8(2)(m) of the *Privacy Act***

CMHC did not disclose personal information during the 2015-2016 reporting period pursuant to paragraph 8(2)(m).

No data matching activities were undertaken.

**(viii) Costs**

During 2015-2016, an estimated \$8,637 in salary costs and \$1,852 in administrative costs were incurred by the ATIP Office to administer the *Privacy Act*.

**(ix) Privacy Impact Assessments**

In 2015-2016, CMHC initiated five (5) PIAs to ensure that it meets its obligations under the *Privacy Act* and the Treasury Board of Canada Secretariat's (TBS) policies, directives, standards and guidelines regarding privacy, information management and security; as well as the factors set out by the Office of the Privacy Commissioner of Canada (OPC) in *Expectations: A Guide for Submitting Privacy Impact Assessments*. As of March 31, 2016, these PIAs were in various stages of approval. In addition, risk management strategies were being developed for implementation so as to ensure risks were mitigated as quickly and efficiently as possible.

- **Lender File Review and Operational Compliance Program**

The Lender File Review and Operational Compliance Program is responsible to conduct reviews for assessing the accuracy of insured mortgage loan information in applications. Under the authority of the *National Housing Act* (NHA), *CMHC's Approved Lender Designation Policies*, the *emili Automated Approval Agreement* and the *Office of the Superintendent of Financial Institutions (OSFI) B-21 Guidelines*, the Program collects personal information submitted by lenders via *emili*; and uses that information to verify that the lender submitted accurate information via *emili* at the time of loan approval and had sufficient documentation on file to substantiate the data submitted. A PIA was undertaken to assess and mitigate any privacy risks associated with this program.

- **Housing Internship Initiative for First Nations and Inuit Youth**

The Housing Internship Initiative for First Nations and Inuit Youth (HIIFNIY) provides funding to First Nation Band Councils, Tribal Councils, Inuit communities or business organizations in order to provide housing-related work experience with on-the-job training to out of school and unemployed Aboriginal youth between the ages of 15 – 30, living on reserve or in Inuit communities. The program is part of the Youth Employment Strategy (YES); a horizontal initiative involving eleven federal departments and agencies, which CMHC is one. Employment and Social Development Canada (ESDC) is the lead department of the YES initiative and has set out terms and conditions to establish a horizontal framework of standard criteria for making contributions and reporting under the YES. A PIA was undertaken to assess any privacy risks associated with the collection of personal information under this initiative.

- **Pension Administration**

The CMHC Pension Plan provides its members and beneficiaries with pension benefits in accordance with the provisions of the CMHC Pension Plan Rules. This is accomplished through efficient administration of the Plan and prudent investment of the Pension Fund to maximize returns while safeguarding assets. In 2015, CMHC entered into an agreement with a third party supplier for the administration of its employee pension benefits. A PIA was undertaken to assess the privacy risks associated with this transfer of administration of pension benefits to a third party provider.

- **Payroll Administration**

In 2015, CMHC entered into an agreement with a third party provider for the administration of its employee payroll. A PIA was undertaken to assess the privacy risks of having the third party provider undertake these services including an assessment of the personal information practices of the provider and the adequacy of protection in the contractual arrangements.

- **Employee Benefits Administration**

In 2015, CMHC entered into an arrangement with a third party provider for the administration of its employee benefits. A PIA was undertaken to assess the privacy risks of having the third party provider undertake these services including an assessment of the personal information practices of the provider and the adequacy of protection in the contractual arrangements.

The detailed Statistical Report is at Annex "A" of this report.

**Annex A : Statistical Report on the *Privacy Act***



**Statistical Report on the *Privacy Act***Name of institution: Canada Mortgage and Housing CorporationReporting period: 2015-04-01 to 2016-03-31**Part 1: Requests Under the *Privacy Act***

	Number of Requests
Received during reporting period	2
Outstanding from previous reporting period	0
<b>Total</b>	<b>2</b>
Closed during reporting period	2
Carried over to next reporting period	0

**Part 2: Requests Closed During the Reporting Period****2.1 Disposition and completion time**

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	1	0	0	0	0	0	1
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
<b>Total</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>

TBS/SCT 350-63 (Rev. 2014/03)

## 2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	2
19(1)(f)	0	22.1	0	27	1
20	0	22.2	0	28	0
21	0	22.3	0		

## 2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

## 2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	1
<b>Total</b>	0	0	1

## 2.5 Complexity

### 2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	2017	1628	1
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	452	0	1
Neither confirmed nor denied	0	0	0
<b>Total</b>	2469	1628	2

## 2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	1	1628	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	1	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1628</b>	<b>0</b>	<b>0</b>

## 2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 2.6 Deemed refusals

## 2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

**2.6.2 Number of days past deadline**

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
<b>Total</b>	0	0	0

**2.7 Requests for translation**

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

**Part 3: Disclosures Under Subsections 8(2) and 8(5)**

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

**Part 4: Requests for Correction of Personal Information and Notations**

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
<b>Total</b>	0

## Part 5: Extensions

### 5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
<b>Total</b>	0	0	0	0

### 5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
<b>Total</b>	0	0	0	0

## Part 6: Consultations Received From Other Institutions and Organizations

### 6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

## 6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0	0

## 6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0	0

## Part 7: Completion Time of Consultations on Cabinet Confidences

### 7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

## 7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

## Part 8: Complaints and Investigations Notices Received

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

## Part 9: Privacy Impact Assessments (PIAs)

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

## 10.1 Costs

Expenditures	Amount
Salaries	\$8,637
Overtime	\$0
Goods and Services	\$1,852
• Professional services contracts	\$0
• Other	\$1,852
<b>Total</b>	<b>\$10,489</b>

**10.2 Human Resources**

<b>Resources</b>	<b>Person Years Dedicated to Privacy Activities</b>
Full-time employees	0.05
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
<b>Total</b>	<b>0.05</b>

**Note:** Enter values to two decimal places.



**Annex B : Delegation Order**

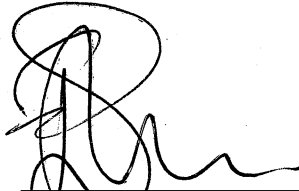
Delegation Order / Décret de délégation

Order Under Section 73 of the *Access to Information Act* and Section 73 of the *Privacy Act*

Pursuant to the authority conferred upon me by Section 73 of the *Access to Information Act* and Section 73 of the *Privacy Act*, I designate the persons holding the positions set out in the attached Schedule, including any person designated in writing to act in the place of the holder of such position, to exercise the powers, duties and perform the functions of the President as the head of a government institution under the Acts as set out in the Schedule opposite each position.

Arrêté en vertu de l'article 73 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*

En vertu de l'autorité que me confère l'article 73 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, les personnes occupant des postes mentionnés à l'annexe ci-joint, y compris une personne désignée par écrit pour agir à la place du titulaire de tel poste, sont autorisées à exercer les pouvoirs et les fonctions ainsi qu'à assumer les attributions qui m'ont été confiés en ma qualité de responsable d'une institution fédérale aux termes des Lois, et énoncés dans l'annexe à l'égard de chaque poste.



\_\_\_\_\_  
President / Président  
Canada Mortgage and Housing Corporation  
Société canadienne d'hypothèques et de logement

1 JUNE 2015  
\_\_\_\_\_  
Date:

***Privacy Act***

<b>Position</b>	<b>Sections</b>
Senior Vice-President, General Counsel and Corporate Secretary	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 14; 15; 17(2)(b); 18(2); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 36(3); 37(3); 51(2)(b); 51(3); 72(1); 77.
Access to Information and Privacy Coordinator (Assistant Corporate Secretary and Director, ATIP)	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 14; 15; 17(2)(b); 18(2); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 36(3); 37(3); 51(2)(b); 51(3); 72(1); 77.
Access to Information and Privacy Officer	8(2)(j); 8(4); 9(1); 9(4); 10; 14; 15; 17(2)(b); 18(2); 19(2); 26; 33(2); 72(1).

***Privacy Act Regulations***

<b>Position</b>	<b>Sections</b>
Senior Vice-President, General Counsel and Corporate Secretary	9; 11(2); 11(4); 13(1); 14
Access to Information and Privacy Coordinator (Assistant Corporate Secretary and Director, ATIP)	9; 11(2); 11(4); 13(1); 14
Access to Information and Privacy Officer	9; 11(2); 11(4)