

ANNUAL REPORT TO PARLIAMENT

PRIVACY ACT

APRIL 1, 2016

MARCH 31, 2017

Table of Contents

1. About the Corporation

- i. Introduction
- ii. Mandate of Canada Mortgage and Housing Corporation
- iii. Administration
- iv. Training and Education
- v. Implementation of Institution-Specific Policies
- vi. Monitoring Reports
- vii. Material Privacy Breaches
- viii. Information Holdings
- ix. Reading Room

2. Report on the *Privacy Act*

- i. Requests under the Act
- ii. Other Requests
- iii. Disposition of Completed Requests
- iv. Completion Time and Extensions
- v. Exemptions Invoked
- vi. Complaints and Investigations
- vii. Disclosure under paragraph 8(2)(m) of the *Privacy Act*
- viii. Costs
- ix. Privacy Impact Assessments

Annex A : Statistical Report on the *Privacy Act*

Annex B : Delegation Order

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 2016-2017.

(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 and the Regional Business Centres in Halifax, Montréal, Toronto, Calgary and Vancouver.

The Assistant Corporate Secretary and Director, ATIP was the Access to Information and Privacy Coordinator until March 7, 2017, when the ATIP function was realigned to the Public Affairs Division. The Director of Outreach was appointed Access to Information and Privacy Coordinator at CMHC. 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 115 employees in Corporate Relations, Housing Finance and Insurance Underwriting. 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, Privacy Impact Assessments and Breach Protocols).

(v) Implementation of Institution-Specific Policies

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.

Furthermore, CMHC published its *Annual Report to Parliament on the Privacy Act* on its website for the first time.

(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:

<https://www.cmhc-schl.gc.ca/en/tran/atip/upload/info-source-2016.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) 748-2501

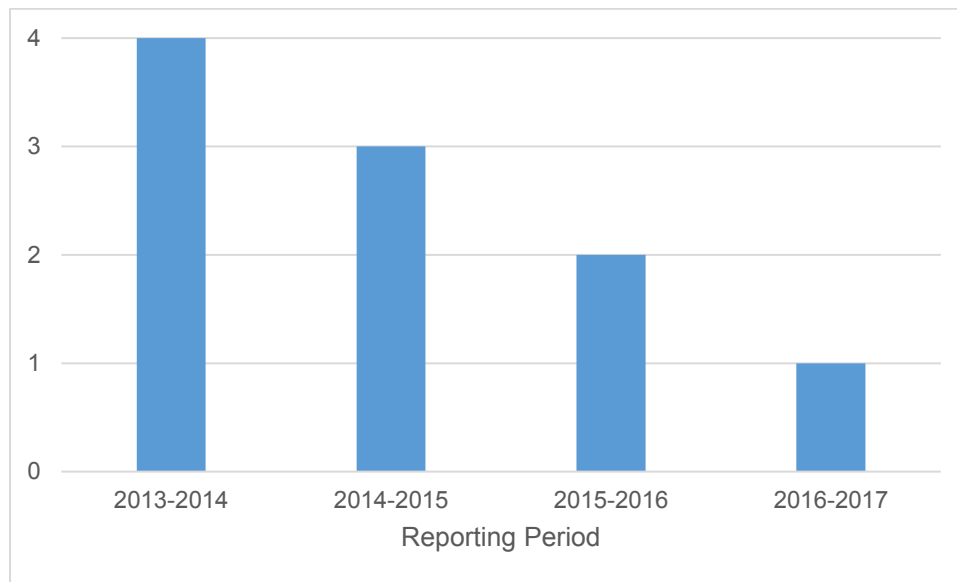
Additional reading rooms are available at each of CMHC's Regional Business Centres.

2. Report on the *Privacy Act*

(i) Requests under the Act

During the reporting period, April 1, 2016, to March 31, 2017, the ATIP Office received a total of 1 new request under the *Privacy Act*. This request was completed during the reporting period. Chart I provides a comparison of requests received under the Act over the last 4 reporting periods.

Chart I: Number of requests received under the Act



(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 the request completed in 2016-2017, the disposition was as follows:

- 1 disclosed in part

(iv) Completion Time and Extensions

The 1 request received was responded to within 16 to 30 days.

(v) Exemptions Invoked

In 2016–2017, 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 requester
- Section 27: Solicitor-client privilege

(vi) Complaints and Investigations

No complaints were received for the 2016-2017 reporting period.

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

CMHC did not disclose personal information during the 2016-2017 reporting period pursuant to paragraph 8(2)(m).

No data matching activities were undertaken.

(viii) Costs

During 2016-2017, an estimated \$3,013 in salary costs and \$1,004 in administrative costs were incurred by the ATIP Office to administer the *Privacy Act*.

(ix) Privacy Impact Assessments

In 2016-2017, CMHC did not complete any Privacy Impact Assessments.

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

Annex A: Statistical Report on the *Privacy Act*

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT



Government of Canada
Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Canada Mortgage and Housing Corporation

Reporting period: 2016-04-01 to 2017-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	1
Outstanding from previous reporting period	0
Total	1
Closed during reporting period	1
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	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	1	0	0	0	0	0	1

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT

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	1
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
Total	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	1,922	1,844	1
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	1,922	1,844	1

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT

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	1,844	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	1	1,844	0	0

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
Total	0	0	0	0	0

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

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT

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
Total	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
Total	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
Total	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
Total	0	0	0	0

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT

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
Total	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
Total	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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
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
Total	0	0	0	0	0	0	0	0

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT

6.3 Recommendations and completion time for consultations received from other organizations

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

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
Total	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
Total	0	0	0	0	0	0	0	0	0	0

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT

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
----------------------------	---

Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		\$3,013
Overtime		\$0
Goods and Services		\$1,004
• Professional services contracts	\$1,004	
• Other	\$0	
Total		\$4,017

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.02
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.02

Note: Enter values to two decimal places.

Annex B: Delegation Order

Delegation Order / Décret de délégation

<p>Order Under Section 73 of the <i>Access to Information Act</i> and Section 73 of the <i>Privacy Act</i></p> <p>Pursuant to the authority conferred upon me by Section 73 of the <i>Access to Information Act</i> and Section 73 of the <i>Privacy Act</i>, 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.</p>	<p>Arrêté en vertu de l'article 73 de la <i>Loi sur l'accès à l'information</i> et de l'article 73 de la <i>Loi sur la protection des renseignements personnels</i></p> <p>En vertu de l'autorité que me confère l'article 73 de la <i>Loi sur l'accès à l'information</i> et de l'article 73 de la <i>Loi sur la protection des renseignements personnels</i>, 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.</p>
--	--



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

Date: June 15, 2017

ANNUAL REPORT TO PARLIAMENT - PRIVACY ACT

Privacy Act

Position	Sections
Vice-President, Public Affairs	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.
Coordinator, Access to Information and Privacy and Chief Privacy Officer	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(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.

Privacy Act Regulations

Position	Sections
Vice-President, Public Affairs	9; 11(2); 11(4); 13(1); 14
Coordinator, Access to Information and Privacy and Chief Privacy Officer	9; 11(2); 11(4); 13(1); 14
Access to Information and Privacy Officer	9; 11(2); 11(4); 13(1); 14

Alternative Text and Data for Figures

Chart I: Number of requests received under the Act

Year	Request Received
2013-2014	4
2014-2015	3
2015-2016	2
2016-2017	1