

CMHC ANNUAL REPORT TO PARLIAMENT

PRIVACY ACT

APRIL 1, 2018 to MARCH 31, 2019

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1. About the Corporation

(i) Introduction

The *Privacy Act* (PA) 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 PA also gives Canadians the right to access personal information held by the government.

(ii) Preparation and Tabling of the Annual Report

The PA requires that the head of every government institution submit an annual report to Parliament on the administration of the PA during the financial year. This report describes how Canada Mortgage and Housing Corporation (CMHC) administered the PA throughout the 2018-2019 fiscal year.

(iii) Mandate of Canada Mortgage and Housing Corporation

CMHC derives its authorities from the *Canada Mortgage and Housing Corporation Act* (CMHC Act) and the *National Housing Act* (NHA). The CMHC Act established CMHC as a Crown corporation and sets 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.”

(iv) Administration

CMHC has approximately 1,900 employees located in Ottawa, the Regional Business Centres in Halifax, Montréal, Toronto, Calgary and Vancouver, as well as working elsewhere remotely.

The Access to Information and Privacy (ATIP) Office is located in Ottawa. The main activities of the ATIP Office include:

- Responding to all requests and enquiries under the *Access to Information Act* (ATIA) and the PA;
- Providing advice and guidance to employees and senior officials on Access to Information and Privacy matters;
- Delivering training and awareness on Access to Information and Privacy;
- Developing and implementing policies, procedures and guidelines in support of the ATIP legislation;
- Preparing the Annual Reports to Parliament on the administration of the ATIA and the PA; and
- Coordinating updates to the Info Source publication.

During the reporting period of April 1, 2018 to March 31, 2019, the ATIP Office was part of the Corporate Relations Office. The ATIP Office was supported by an ATIP

Coordinator and 1-2 ATIP Analysts. The Director of Corporate Relations was the Chief Privacy Officer.

The President delegated all of the responsibilities set out in the PA to the Director, Corporate Relations and to the ATIP Coordinator. The day-to-day responsibilities under the PA are delegated to the ATIP Analysts.

Organizational changes implemented in 2019-2020 that impact the ATIP Office and the Delegation Order will be reflected in the report for 2019-2020.

(v) Training and Education

During this reporting period the ATIP Office developed an online training resource for employees containing links to Treasury Board Guidelines, Policies and Directives on the application of the ATIA and the PA as well as CMHC's internal Privacy policy suite, publications, reporting requirements and FAQs.

The ATIP Office also continued efforts towards embedding a culture of ATIP excellence across CMHC. These efforts included promoting Privacy Week within CMHC in May, by posting privacy awareness ads relating to safe use of social media and technology on both CMHC TV and in CMHC's daily newsletter, Agora

(vi) Policies, Guidelines, Procedures and Initiatives

(a) Privacy Protocol for non-administrative use

During the reporting period, the ATIP Office established several privacy protocols for new initiatives with a non-administrative purpose. CMHC is responsible for ensuring that its privacy protocols include all privacy protection procedures that must be followed to manage the collection, use, or disclosure of personal information for non-administrative purposes in compliance with the [Privacy Act](#), the [Privacy Regulations](#), and the related privacy policy requirements of the Treasury Board of Canada Secretariat (TBS). An effective privacy protocol provides a clear framework that raises the level of privacy awareness in CMHC as well as with external users and recipients of personal information. It can also clarify the rights and obligations of parties to data sharing agreements involving the disclosure of personal information for a non-administrative purpose.

(b) Compliance

During the reporting period, operational compliance of the PA was Chief Risk Officer, Compliance. In 2018-2019, all major IT agreements were reviewed to ensure that proper language was provided in relation to the protection of privacy in IT activities including outsourcing arrangements.

(c) Retention and Disposition Schedule

Establishing appropriate retention periods for records is good risk management and the ATIP Office has been working with its corporate information management team to improve retention and disposition schedules through

modernization of our technology. We expect this work to be completed by end of 2019.

(vii) Monitoring Reports

The ATIP Office uses an automated case management solution to monitor the time to process Privacy requests. This software provides CMHC with a secure, flexible and user-friendly system to manage requests for information and record project details. Please note that during this reporting period, CMHC did not receive any requests for the correction of personal information.

(viii) Privacy Breaches

No material privacy breaches occurred during the reporting year.

(ix) Information Holdings

A description of institutional classes of records and personal information banks for CMHC can be found in the publication [Info Source 2018 - Sources of Federal Government and Employee Information – Canada Mortgage and Housing Corporation](#), available on [CMHC's website](#).

(x) Reading Room

The CMHC Library is a designated public reading room and is available to individuals wanting to review CMHC publications and other public materials. The CMHC Library is located at:

Canada Mortgage and Housing Corporation
700 Montreal Road
Ottawa, Ontario K1A 0P7
Telephone Number: (613) 748-2501

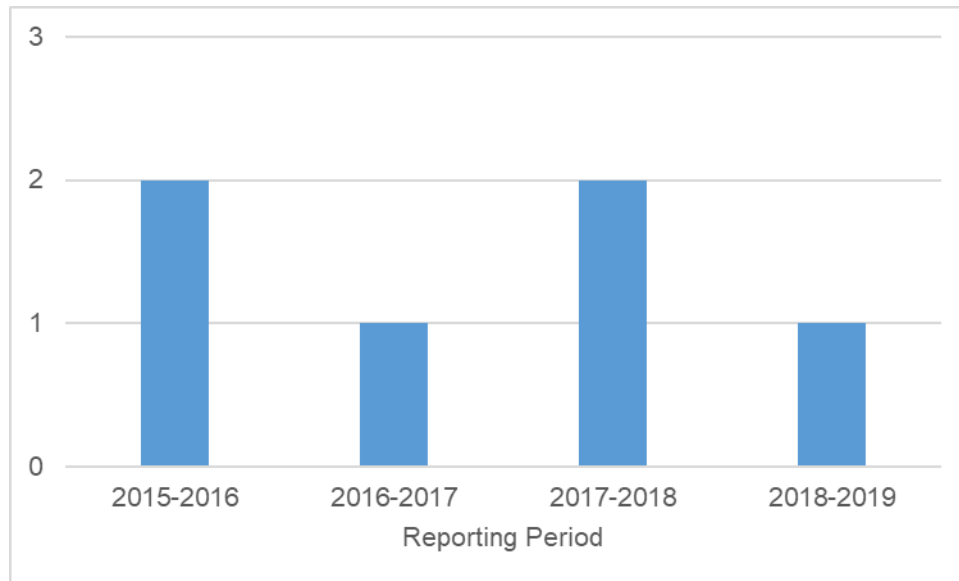
Additional reading rooms are available at each of CMHC's Regional Business Centres.

2. Report on the *Privacy Act*

(i) Requests under the Act

During the reporting period, April 1, 2018, to March 31, 2019, the ATIP Office received one new request under the PA. This request was completed during the reporting period. Chart I provides a comparison of requests received under the *Act* over the last four reporting periods.

Chart I: Number of requests received under the Act



(ii) Other Requests

The ATIP Office also acted as a resource for CMHC staff 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, employee relations 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 requests completed in 2018-2019, one disposition was disclosed in part.

(iv) Completion Time and Extensions

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

(v) Exemptions Invoked

In 2018–2019, the ATIP Office invoked one exemption under the PA. The exemption was as follows:

- Section 26: Exempting personal information about individuals other than the requester.

(vi) Complaints and Investigations

No complaints were received for the 2018-2019 reporting period.

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

CMHC did not disclose personal information during the 2018-2019 reporting period pursuant to paragraph 8(2)(m).

No data matching activities were undertaken.

(viii) Costs

During 2018-2019, an estimated \$30,171 in salary costs and \$10,672 in administrative costs were incurred by the ATIP Office to administer the PA.

(ix) Privacy Impact Assessments

A total of five Privacy Impact Assessments (PIAs) were conducted in the reporting period. These PIAs were for both new and existing programs/services and the risk analysis identified the extent to which the programs/services comply with all privacy principles and where mitigations should be implemented to protect the privacy of individuals in compliance with the PA. Of the five, two have been finalized, signed and approved and will be submitted to the Office of the Privacy Commissioner of Canada and the Information and Privacy Policy Division of the Treasury Board of Canada Secretariat in the 2019-2020 fiscal year.

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 Corporation

Reporting period: 2018-04-01 to 2019-03-31

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

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	0
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	1	0	0
Total	1	0	0

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	117	117	1
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	117	117	1

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	1	117	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	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	1	117	0	0	0	0	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

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

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 institutions

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

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
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

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	2
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Part 10: Resources Related to the Privacy Act

10.1 Costs

Expenditures	Amount
Salaries	\$30,171
Overtime	\$0
Goods and Services	\$10,672
• Professional services contracts	\$0
• Other	\$10,672
Total	\$40,843

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.15
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.15

Note: Enter values to two decimal places.

Annex B: Delegation Order

Privacy Act

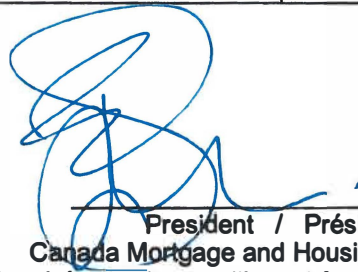
Position	Sections
Director, Corporate Relations and Chief Privacy Officer	8(2)(j); 8(2)(m); 8(4); 8(5); 9(1); 9(4); 10; 14; 15; 17(2)(b); 18(2); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 36(3); 37(3); 51(2)(b); 51(3); 72(1); 77.
Coordinator and Officer, Access to Information and Privacy	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.
Analyst, Access to Information and Privacy	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; 23; 24; 25; 26; 27; 28; 31; 33(2); 72(1).

Privacy Act Regulations

Position	Sections
Director, Corporate Relations and Chief Privacy Officer	9; 11(2); 11(4); 13(1); 14
Coordinator and Officer, Access to Information and Privacy	9; 11(2); 11(4); 13(1); 14
Analyst, Access to Information and Privacy	9; 11(2); 11(4); 13(1); 14

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

5 April 2018
Date: _____