

Annual Report to Parliament: *Privacy Act*

April 1, 2021 to
March 31, 2022

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Introduction

As set out in Section 2 of the *Privacy Act (PA)*, the purpose of this Act is “to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information”.

Who We Are

We exist for a single reason: to make housing affordable for everyone in Canada. We know that housing helps people stay employed, do better in school and participate more fully in society. Housing affordability and a stable housing finance system support a stronger, safer Canada where everyone can live with dignity.

We derive our authorities from the *Canada Mortgage and Housing Corporation Act (CMHC Act)* and the *National Housing Act (NHA)*. The CMHC Act established us as a Crown Corporation and sets out the various powers and functions of the Corporation.

The NHA provides us with our 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.”

Delegation of Authority

Corporately, we have approximately 2,350 employees located across Canada. The Privacy Office is our centralized authority on all privacy-related matters, including training, and overseeing compliance with the Privacy Act and the Corporation’s Privacy Program except the Access to Information and Privacy Office (ATIP Office) is responsible for processing requests under the *Privacy Act* and for correction of personal information. **The President of CMHC has delegated authority and responsibility for the Privacy Act to the Director Compliance & Governance (Delegated Privacy Officer), who will act as the contact within the Privacy Office for internal privacy issues and as the external contact person in the context of privacy queries complaints and regulatory investigations.** The Privacy Office is comprised of the Delegated Privacy Officer, a Senior Manager, a Specialist and 16 Privacy Leads. The Privacy Office is supported by an Advisor, Privacy and Data Governance. In addition, a Specialist and Senior Specialist support the Privacy Office with 50% of their time allocated to the Privacy Office.

The ATIP Office is also responsible for:

- Responding to all requests and enquiries under complaints the *Access to Information Act (ATIA)* and the PA;
- Providing training, advice and guidance to employees and senior management on Access to Information matters;
- Developing and implementing policies, procedures and guidelines in support of the ATI legislation;
- In collaboration with the Privacy Office, preparing the Annual Reports to Parliament on the administration of the ATIA and the PA.

Performance 2021-2022

Requests under the Act

During the reporting period, April 1, 2021, to March 31, 2022, we received 14 new request under the PA. A 27% increase over the previous reporting year. These requests were completed during the reporting period. Table I provides a comparison of requests received under the Act over the last three reporting periods.

Table I: Number of requests received under the Act

Fiscal Year	Outstanding	Received	Completed	Carried Forward
2019-2020	0	6	6	0
2020-2021	0	11	11	0
2021-2022	0	14	13	1

Other Requests

The Privacy Office also acted as a resource for CMHC staff and offered advice and guidance on the provisions of the legislation. The Privacy Office was consulted on issues relating to a range of privacy matters that include: consent, safeguarding, retention, limiting use, accountability, accuracy and identifying purpose of personal information (PI) as well as matters that border on the Privacy Act.

Disposition of Completed Requests

For the requests completed in 2021-2022, two requests were disclosed in part, five no records exist and six were abandoned by applicant. Table II provides a comparison of the requests' disposition under the Act.

Table II: Disposition of requests received under the Act

All Disclosed	Disclosed in Part	Exempted in Entirety	Abandoned	No Records Exist
0%	15%	0%	46%	39%

Completion Time and Extensions

For the requests completed in 2021-2022, six requests were complete between 1 to 15 days, six requests were also completed between 16 to 30 days. One was completed within 31 to 60 days. Table III illustrates the processing time taken for the PA requests.

Table III: Completion time of requests received under the Act

30 days or less	31 to 60 days	31 to 120 days	121 to 180 days	181 to 365 days	More than 365 days
46%	46%	8%	0%	0%	0%

Costs

During 2021-2022, we incurred an estimated \$345,355.00 in salary costs and no other costs to administer the PA.

Exemptions Invoked

In 2021-2022, we invoked only one exemption under the PA. The exemption was as follows:

- Section 26: Exempting personal information about individuals other than the requester (2).

COVID-19 Implications

While the global pandemic caused by COVID-19 impacted operations across government, our release trends remained stable. This is the result of our early, pre-pandemic investment in technology and business transformation that digitized our operations and included strong records retention policies, and our work culture shift to a Results Only Work Environment™ as well as employees’ ability to work remotely prior to the pandemic that helped our teams remain operational across the country.

Training and Awareness

The Privacy Office continued to proactively embed a culture of privacy awareness excellence across the company. These efforts included training and prompt updates to our Privacy Corporate Page with privacy related content.

The Privacy Office has an ongoing Monthly Privacy Leads Meeting and uses it as an opportunity to train and educate the Privacy Leads. Privacy Leads are the privacy representatives from each sector at CMHC. The training of Privacy Leads border on general privacy principles, their roles and responsibilities including how to complete Privacy Impact Assessments, how to identify a privacy incident and initial containment efforts.

The Privacy Office also deployed a mandatory training to all staff “CMHC Privacy Awareness” in 2021. The focus was to create awareness to all CMHC employees on privacy, how to manage personal information and how to report a privacy incident or non-compliance to the Privacy Act.

The Privacy Office continued to engage individuals and teams on a one-on-one basis, to provide ad hoc trainings and advise on all privacy related issues.

Policies, Guidelines, Procedures and Initiatives

Privacy Policy

The Privacy Office and CMHC continued to implement a Privacy suite of procedures, protocols and directives to enhance process and knowledge of key principles to remain in compliance with the PA. Elements of this suite include:

- Disclosure of Personal Information to Third Parties Procedure;
- Privacy Incident Management Protocol;
- Privacy Impact Assessment Procedure;
- Ethical and Responsible Use of Personal Information Directive;
- Third Party Privacy Risk Management Procedure.

Compliance and Governance

Our attention in 2021 was focused on privacy maturity and enhancements to the program to ensure our compliance with the Privacy Act. Actions included:

- Reviewed and updated our suite of privacy policies and Protocols in line with the review cycles.
- Optimized the privacy incident capturing process and integrated the privacy incident reporting process with the overall risk event process.
- Created and filled the position of Advisor, Privacy & Data Governance to provide valuable insight and support to the Privacy Office.
- We relay to the Board on a quarterly basis our assessment of all risks, including privacy.
- Enhance transparency regarding CMHC practices for collection, use and disclosure of Personal Information.
- Continued to deploy effective privacy trainings to upskill all employees.

Summary of Key Issues and Actions Taken on Complaints or Audits

No new complaints were filed against CMHC with the Privacy Commissioner during the reporting period.

Fiscal Year	Outstanding	Received	Completed	Carried Forward
2019-2020	0	2	1	1
2020-2021	0	0	0	1
2021-2022	1	0	0	0

Monitoring Compliance

We use an automated case management solution to monitor the time to process Access to Information requests. This software provides us with a secure and flexible system to manage requests for information and record project details.

The Privacy Office monitors compliance and completes a Compliance Attestation, on behalf of the Corporation, which is provided to the Board on yearly basis.

Privacy Breaches

No material privacy breaches were reported to the Office of the Privacy Commissioner and to the Treasury Board of Canada Secretariat during the reporting period.

Privacy Impact Assessments

Ten Privacy Impact Assessments (PIAs) were 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 2021-2022 fiscal year. The PIAs completed were for the following programs/activities:

- Fraud Risk Management (Luminate)
- Veranova Properties Limited
- Corporate Insurance (Opticrisk)
- DocCentre & Digital Mail Services (Xerox)
- Employee Relations Case Management System (Sodales)
- Legal Request System (Flowfit-Consoltec)
- Pei Rural and Native Housing Program
- Outsourcing Pension Plan Payments
- CMHC mandatory vaccination measures initiative
- Richmond Advisory Services

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.

Public Interest Disclosures

We did not disclose personal information during the 2021-2022 reporting period pursuant to paragraph 8(2) (m).

No data matching activities were undertaken.

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

Information Holdings

A description of institutional classes of records and personal information banks for CMHC can be found in the publication *info source 2021 - Sources of Federal Government and Employee Information – Canada Mortgage and Housing Corporation*, available on [CMHC's website](#).

Annex A – Statistical Report on the *Privacy Act*



Name of institution: Canada Mortgage and Housing Corporation

Reporting period: 01/04/2021 to 31/03/2022

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

	Number of Requests
Received during reporting period	14
Outstanding from previous reporting periods	0
• Outstanding from previous reporting period	0
• Outstanding from more than one reporting period	0
Total	14
Closed during reporting period	13
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	12
E-mail	1
Mail	0
In person	0
Phone	0
Fax	1
Total	14

Section 2: Informal Requests

2.1 Number of informal requests

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting periods	0
• Outstanding from previous reporting period	0
• Outstanding from more than one reporting period	0
Total	0
Closed during reporting period	0
Carried over to next reporting period	0

2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

2.3 Completion time of informal 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	
0	0	0	0	0	0	0	0

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 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
0	0	0	0	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
	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	1	0	0	0	0	2
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	5	0	0	0	0	0	5
Request abandoned	6	0	0	0	0	0	0	6
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	6	6	1	0	0	0	0	13

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(a)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(b)	0	22(1)(b)	0	24(b)	0
19(1)(c)	0	22(1)(c)	0	25	0
19(1)(d)	0	22(2)	0	26	2
19(1)(e)	0	22.1	0	27	0
19(1)(f)	0	22.2	0	27.1	0
20	0	22.3	0	28	0
21	0	22.4	0		
22(1)(a)(i)	0	23(a)	0		

3.3 Exclusions

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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
1	1	0	0	0	0

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper and e-record formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
638	615	8

3.5.2 Relevant pages processed by request disposition for paper and e-record formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 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	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	2	638	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	6	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	6	0	2	638	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

	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

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	Percentage of requests closed within legislated timelines (%)
13	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 Request 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
Total	0	0	0

3.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

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
Total	0

Section 6: Extensions

6.1 Reasons for extensions

Number of requests where an extension was 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	
1	0	1	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	0	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	0	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
Total	0	0	0	0
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
	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	
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	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

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
	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	
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	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

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		501-1000 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

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 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

Section 9: Complaints and Investigations Notices Received

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

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

Number of PIAs completed	Number of PIAs modified
6	0

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	26	1	0	0
Central	56	0	0	0
Total	82	1	0	0

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

Number of material privacy breaches reported to TBS	Number of material privacy breaches reported to OPC
0	0

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches
18

Section 12: Resources Related to the *Privacy Act*

12.1 Allocated Costs

Expenditures	Amount
Salaries	\$345,355
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
Total	\$345,355

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	3.260
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	3.260

Note: Enter values to three decimal places.

Annex B – Delegation Order

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 95(1) of the *Access to Information Act* and Section 73(1) 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.

Romy Bowers

President
Canada Mortgage and Housing Corporation

Date: December 21, 2021

Schedule

Access to Information Act

Position	Sections
Chief of Staff	4(2.1); 7(a); 7(b); 8(1); 9; 11(2); 11(3); 11(4); 11(5); 11(6); 12(2); 12(3); 13; 14; 15; 16; 16.5; 17; 18; 18.1; 19; 20; 21; 22; 22.1; 23; 24; 25; 26; 27(1); 27(4); 28(1); 28(2); 28(4); 29(1); 33; 35(2); 37(4); 43(1); 44(2); 52(2); 52(3); 71; 77.
Senior Manager, Briefings and ATIP	4(2.1); 7(a); 7(b); 8(1); 9; 11(2); 11(3); 11(4); 11(5); 11(6); 12(2); 12(3); 13; 14; 15; 16; 16.5; 17; 18; 18.1; 19; 20; 21; 22; 22.1; 23; 24; 25; 26; 27(1); 27(4); 28(1); 28(2); 28(4); 29(1); 33; 35(2); 37(4); 43(1); 44(2); 52(2); 52(3); 71; 77.
Senior Analyst, Access to Information and Privacy	4(2.1); 7(a); 7(b); 8(1); 9; 11(2); 11(3); 11(4); 11(5); 11(6); 12(2); 12(3); 13; 14; 15; 16; 16.5; 17; 18; 18.1; 19; 20; 21; 22; 22.1; 23; 24; 25; 26; 27(1); 27(4); 28(1); 28(2); 28(4).

Access to Information Act Regulations

Position	Sections
Chief of Staff	6(1); 7(2); 7(3); 8
Senior Manager, Briefings and ATIP	6(1); 7(2); 7(3); 8
Senior Analyst, Access to Information and Privacy	6(1); 7(2); 7(3); 8

Privacy Act

Position	Sections
Chief of Staff	8(2)(j); 8(2)(m); 8(4); 8(5); 14; 15; 16; 17(2)(b); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 37(3); 51(2)(b); 51(3); 72(1); 77
Senior Manager, Briefings and ATIP	8(2)(j); 8(2)(m); 8(4); 8(5); 14; 15; 16; 17 (2)(b); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 37(3); 51(2)(b); 51(3); 72(1); 77
Senior Analyst, Access to Information and Privacy	8(2)(j); 8(2)(m); 8(4); 8(5); 14; 15; 16; 17(2)(b); 19(1); 19(2); 20; 21; 22; 22.3; 23; 24; 25; 26; 27; 28; 31; 33(2); 35(1); 35(4); 37(3); 51(2)(b); 51(3); 72(1); 77
Chief Risk Officer	8(2)(j); 8(2)(m);8(5); 9(1); 9(4); 10;18(2);19(2); 33(2); 35(1); 36(3); 37(3); 72(1).
Director, Compliance and Governance, Delegated Privacy Officer	8(2)(j); 8(2)(m);8(5); 9(1); 9(4); 10;18(2);19(2); 33(2); 35(1); 36(3); 37(3); 72(1).
Senior Manager, Operational Risk	8(2)(j); 8(2)(m);8(5); 9(1); 9(4); 10;18(2);19(2); 33(2); 35(1); 36(3); 37(3); 72(1).
Senior Specialist, Quality Assurance	8(2)(j); 9(1); 9(4); 10; 19(2); 35(1); 36(3); 37(3); 72(1).
Specialist, Quality Assurance	8(2)(j); 9(1); 9(4); 10; 19(2); 35(1); 36(3); 37(3); 72(1).

Privacy Act Regulations

Position	Sections
Chief of Staff	7, 9; 11(2); 11(4); 13(1); 14
Senior Manager, Briefings and ATIP	7, 9; 11(2); 11(4); 13(1); 14
Director, Compliance and Governance, Delegated Privacy Officer	9; 11(2); 11(4); 13(1); 14
Senior Manager, Operational Risk	9; 11(2); 11(4); 13(1); 14
Senior Specialist, Compliance and Quality Assurance	11(2); 11(4)
Specialist, Quality Assurance	11(2); 11(4)