



2015-2016 Annual Report on the  
*Privacy Act*

# Table of Contents

1. Report on the *Privacy Act*
  - 1.1 Introduction
  - 1.2 Corporate Overview
  - 1.3 Establishment of the ATIP Program
  - 1.4 Delegation Orders
  - 1.5 Statistical Report
  - 1.6 Completion Time and Extensions
  - 1.7 Education and Training
  - 1.8 Policies, Guidelines, Procedures, and Initiatives
  - 1.9 Complaints, Investigations and Federal Court Cases
  - 1.10 Privacy Breaches
  - 1.11 Privacy Impact Assessments
  - 1.12 Disclosures Under Paragraph 8(2)(m) of the *Privacy Act*

## Appendices

Appendix A: Statistical Report on the *Privacy Act*

# 1. Report on the *Privacy Act*

## 1.1 Introduction

The *Privacy Act* provides Canadian citizens, permanent residents of Canada and all individuals present in Canada with the right of access to, and the right to request the correction of personal information about themselves that is under the control of a government institution. The right of access also extends to the personal opinions and views that have been expressed about the individual by other individuals, including the names of those other individuals where they appear with the views and opinions that they have expressed.

The *Privacy Act* also provides the legal framework for the collection, use, disclosure, accuracy, retention, protection and disposition of personal information which is under the control of government institutions subject to the *Privacy Act*.

This Annual Report, to be tabled in Parliament in accordance with section 72 of the *Privacy Act*, summarizes the activities of the Windsor-Detroit Bridge Authority (WDBA) as they relate to the administration of the *Privacy Act* for the period extending from April 1, 2015 to March 31, 2016.

## 1.2 Corporate Overview

WDBA is a non-agent parent Crown Corporation established by Letters Patent pursuant to s.29 (1) of the *International Bridges and Tunnels Act*. It is a Schedule III, Part I parent Crown Corporation under Part X of the *Financial Administration Act* (the FAA).

WDBA is accountable to Parliament through the Minister of Infrastructure and Communities. As a Crown corporation, it is subject to the Crown corporation governance regime established under Part X of the FAA and a range of other applicable statutes.

Under the terms of its Letters Patent and the Crossing Agreement, WDBA is responsible for constructing and operating the Detroit River International Crossing, through one or more public-private partnership (P3) agreements. (In May 2015, the Prime Minister of Canada and the Governor of the State of Michigan named the bridge and project, the Gordie Howe International Bridge.)

## 1.3 Establishment of the Access to Information and Privacy Program

The Access to Information and Privacy program was formally established during the reporting period, and the Chief Financial Administrative Officer (CFAO) coordinated most of the activities pertaining to the administration of the *Access to Information Act* and *Privacy Act*, with the assistance of two staff members and one outside resource. Fiscal year 2016-2017 will be used to consolidate the program and develop in-house expertise on the interpretation and application of the two *Acts*.

## 1.4 Delegation Orders

Section 73 of the *Privacy Act* provides that “*The head of a government institution may, by order, designate one or more officers or employees of that institution to exercise or perform any of the powers, duties or functions of the head of the institution under this Act that are specified in the order.*”

The WDBA had no delegation order for the reporting period, as the powers and responsibilities under the *Access to Information Act* were retained exclusively by the head of the institution, the President and CEO.

## 1.5 Statistical Report

The statistical reports prepared by government institutions provide aggregate data on the application of the *Privacy Act*.

WDBA received one request for access to personal information under the *Privacy Act* during the reporting period. The processing of that request was still ongoing as of March 31, 2016, and it was carried over to fiscal year 2016-2017.

Requests Under the <i>Privacy Act</i>	
Number of requests (2015-2016)	
Type	Number of Requests
Received during reporting period	1
Outstanding from previous reporting period	0
<b>Total</b>	<b>1</b>
Closed during reporting period	0
Carried over to next reporting period	1

WDBA’s 2015-2016 statistical report on the *Privacy Act* is provided in Appendix B.

## 1.6 Completion Time and Extensions

WDBA received one request for access to personal information under the *Privacy Act* during the reporting period. A time extension was applied and, as the processing of that request was still ongoing as of March 31, 2016, it was carried over to fiscal year 2016-2017.

## 1.7 Education and Training

During the fall of 2015 briefings as well as training and awareness sessions were held with the help of an external resource:

- The three employees responsible for the administration of the ATIP Acts attended a comprehensive three-day training session, which covered the processing of requests for access to personal information and the processing of requests for the correction of personal information, and the interpretation and application of the exemption and exclusion provisions. The training also covered the development of a privacy management framework, the registration of personal information banks with the Treasury Board of Canada Secretariat, the conduct of privacy impact assessments, the establishment of an ATIP office as well as the obligations of WDBA as they relate to the Info Source publication, the production of statistical reports for the Treasury Board of Canada Secretariat and the annual reports to Parliament;
- A three-hour briefing was provided to the CEO and WDBA Executives to highlight their roles and responsibilities under both *Acts*. It also touched on issues of specific interest to them, such as the application of the *ATI Act* to the minutes of their meetings and the records that they create, including the status of their personal notes as defined by the Courts;
- A series of awareness sessions provided the other employees of the WDBA with a high level review of the requirements of the *ATI Act*, with an emphasis on their roles and responsibilities as they relate to the search and retrieval of records and personal information that are the subject of an access request and the formulation of recommendations on the disclosure of information. Other topics covered included the creation of records and information, the management and protection of personal information as well as the interaction between the *Privacy Act*, the *ATI Act*, information management and information security.

## 1.8 Policies, Guidelines, Procedures and Initiatives

An external resource assisted WDBA in identifying the policies and procedures that should be put in place so WDBA can fulfill its statutory obligations under the *Privacy Act* and the Treasury Board of Canada policies and directives on privacy protection, and a detailed plan was developed to have those policy instruments written and implemented during fiscal year 2016-2017.

## 1.9 Complaints, Investigations and Federal Court Cases

No complaints were made against the WDBA under the *Privacy Act* during fiscal year 2015-2016, and no audits or investigations were conducted at the WDBA by the Office of the Privacy Commissioner of Canada. There are no Court cases to report in relation to the *Privacy Act*.

## 1.10 Privacy Breaches

WDBA does not have any privacy breaches to report for fiscal year 2015-2016. That said, a Privacy Breach Policy will be developed during fiscal year 2016-2017 to respond to privacy breaches that may occur in the future.

## 1.11 Privacy Impact Assessments

The privacy impact assessment (PIA) is the component of risk management that aims to ensure compliance with the requirements of the *Privacy Act* and that the privacy rights of individuals are adequately protected by:

- The application of sound risk management principles;
- The implementation of cost-effective security measures; and,
- Ensuring that all activities involving the creation, collection, use, disclosure/sharing, retention, protection and disposition of personal information are properly assessed and that the potential risks associated with those activities are properly addressed or mitigated.

The WDBA did not conduct any PIA during fiscal year 2015-2016, but plans are in place to have a core PIA conducted during fiscal year 2016-2017. Other PIAs will also be conducted as required.

### 1.12 Disclosures Under Paragraph 8(2)(m) of the *Privacy Act*

Paragraph 8(2)(m) allows for the disclosure of personal information when the public interest clearly outweighs any invasion of privacy or when the disclosure would benefit the individual to whom the personal information relates. There were no disclosures pursuant to paragraph 8(2)(m) in 2015-2016.

# Appendix A



Government of Canada / Gouvernement du Canada

## Statistical Report on the *Privacy Act*

Name of institution: Windsor-Detroit Bridge Authority

Reporting period: 2015-04-01 to 2016-03-31

### Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	1
Outstanding from previous reporting period	0
<b>Total</b>	1
Closed during reporting period	0
Carried over to next reporting period	1

### 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	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
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
<b>Total</b>	0	0	0	0	0	0	0	0

## 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	0
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	0	0	0
<b>Total</b>	0	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	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0



<b>Total</b>	0	0	0
--------------	---	---	---

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

<b>Disposition</b>	<b>Less Than 100 Pages Processed</b>		<b>101-500 Pages Processed</b>		<b>501-1000 Pages Processed</b>		<b>1001-5000 Pages Processed</b>		<b>More Than 5000 Pages Processed</b>	
	<b>Number of Requests</b>	<b>Pages Disclosed</b>	<b>Number of Requests</b>	<b>Pages Disclosed</b>	<b>Number of Requests</b>	<b>Pages Disclosed</b>	<b>Number of Requests</b>	<b>Pages Disclosed</b>	<b>Number of Requests</b>	<b>Pages Disclosed</b>
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	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
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

## 2.5.3 Other complexities

<b>Disposition</b>	<b>Consultation Required</b>	<b>Legal Advice Sought</b>	<b>Interwoven Information</b>	<b>Other</b>	<b>Total</b>
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>	0	0	0	0	0

## 2.6 Deemed refusals

### 2.6.1 Reasons for not meeting statutory deadline

<b>Number of Requests Closed Past the Statutory Deadline</b>	<b>Principal Reason</b>			
	<b>Workload</b>	<b>External Consultation</b>	<b>Internal Consultation</b>	<b>Other</b>

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
<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



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

## Part 10: Resources Related to the *Privacy Act*

### 10.1 Costs

Expenditures	Amount
Salaries	\$2,135
Overtime	\$0
Goods and Services	\$3,390
• Professional services contracts	\$3,390
• Other	\$0
<b>Total</b>	<b>\$5,525</b>

## 10.2 Human Resources

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

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