

Annual Report

Privacy

2023-2024



Statistics
Canada

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Introduction

The *Privacy Act* gives Canadian citizens and people living in Canada the right to access their personal information being held by federal government institutions. The Act also protects against unauthorized disclosure of that personal information, and it strictly controls how the government collects, uses, stores, discloses, and disposes of any personal information.

The Annual Report on the *Administration of the Privacy Act* is prepared and submitted, in accordance with section 72 of the Act, and it covers the period from April 1, 2023, to March 31, 2024. The report is tabled in Parliament.

Statistics Canada's mandate is to produce data that helps Canadians better understand their country – its population, resources, economy, environment, society and culture. The agency is legislated to serve this function for Canada and each of the provinces and territories. The agency must also conduct the Census of Population and the Census of Agriculture every five years, providing a detailed picture of Canadian society.

Statistics Canada did not have any non-operational subsidiaries during the reporting period.

Administration of the *Privacy Act*

The *Privacy Act*, which concerns itself with personal information, stipulates that government institutions can collect personal information only if it relates to the operation of programs or activities of these institutions. In the case of Statistics Canada, the *Statistics Act* provides the authority to collect personal information. In addition, institutions are required to protect the collected information from disclosure. The Director of the Office of Privacy Management and Information Coordination administers the Access to Information and Privacy legislations within Statistics Canada and is also the Access to Information and Privacy (ATIP) Coordinator and Chief Privacy Officer for the Agency.

Organizational Structure of Statistics Canada

Statistics Canada's mandate derives primarily from the *Statistics Act*. The Act requires that the Agency collect, compile, analyze and publish statistical information on the economic, social, and general conditions of the country and its citizens. The Act also requires that Statistics Canada coordinate the national statistical system, in particular, to avoid duplication in the information collected by government. To this end, the Chief Statistician may enter into joint data collection or sharing agreements with provincial and territorial statistical agencies, as well as with federal, provincial and territorial government departments, pursuant to provisions of the Act.

The *Statistics Act* specifically requires Statistics Canada to conduct a Census of Population and a Census of Agriculture every five years as it did in 2021. The Act also gives the Agency substantial powers to request information through surveys of Canadian businesses and households. Under the Act, the Chief Statistician determines whether a survey will be mandatory or voluntary. Statistics Canada has generally made voluntary household data collection other than the Census of Population and the Labour Force Survey, as the latter produces key economic data. The Census of Agriculture and most other business surveys are mandatory. Refusal to participate in a mandatory survey is subject to legal penalties.

By law, Statistics Canada can also access administrative records, including personal and business tax data, credit information, customs declarations, and birth and death records. Such records are critical sources of statistical information that enable the Agency to reduce the reporting burden on businesses and individual respondents. Statistics Canada is considered a leader among the world's statistical agencies in reducing reporting burden by using administrative data.

Statistics Canada is ensuring that privacy protection methods and protocols continue to evolve as new data sources with varying levels of sensitivity emerge. The Necessity and Proportionality framework was implemented to ensure increasing transparency in the data acquisition process, to provide stronger justification (necessity) for data acquisition, and to be more explicit about the efforts used to gather data in a manner that is both efficient and proportional to its necessity and sensitivity. This includes ensuring that necessity (requirement for data or information) is well-defined; applying the scientific approach and a series of checkpoints on sensitivity, ethics and proportionality (quality, sample size, content and risk mitigation); considering alternative methods; and requiring a privacy impact assessment and communication throughout the process to ensure transparency.

Statistics Canada adopted a Responsible Privacy approach to honour the commitment made to Canadians to protect their personal information. These mechanisms help Statistics Canada to fulfill this commitment while ensuring that Canadians have all the key information on Canada's economy, society and environment that they require to function effectively as citizens and decision-makers in a rapidly evolving world.

The Access to Information and Privacy (ATIP) Office operates within an allocation of 3.54 persons/year. One ATIP Manager, two Senior ATIP analysts, and one ATIP analyst worked full time on the processing of requests. As the backlog was completed prior to the start of the fiscal year and the workload stabilized, departing employees were not replaced and the ATIP office is currently made up of one ATIP Manager, one ATIP analyst and one junior ATIP analyst. No consultants were hired during the reporting period. Statistics Canada was not a party to any agreements under section 73.1 of the *Privacy Act* during the reporting period.

Delegation Order

The delegation order exercises the powers and functions of the Minister as the head of a government institution, pursuant to section 73 of the *Privacy Act*. The current detailed list of authorities under the *Privacy Act* has been formally delegated by the Minister of Innovation, Science and Economic Development as of May 18, 2021, (Appendix A) and provides full delegated authority to the Director and Assistant Director of the Office of Privacy Management and Information Coordination.

Performance 2023-2024

The Agency received 52 new requests in 2023-2024 and 3 requests were carried over from the previous reporting period. During this period, 54 requests were completed, and 1 request was carried forward to the next reporting period.

For 4 requests, information was disclosed completely and for 21 requests, information was partially

Disposition of requests completed	
All disclosed	4
Disclosed in part	21
Nothing disclosed (exempt)	0
Does not exist	12
Abandoned	17
Total	54



disclosed, having redactions applied to protect personal information pertaining to other individuals. There were no (0) requests exempted/excluded, for 12 requests the information did not exist, and 17 requests were abandoned as applicants did not respond to requests for additional information or chose to withdraw them entirely. The public is the largest privacy client group for Statistics Canada.

In addition to requests from the public, the Agency receives requests from current and former federal public servants regarding personal or staff relations issues. Statistics Canada responds to a number of requests for personal information through its pension search program. This program provides members of the public with information from their own census records, and from the 1940 National Registration records, to support their applications for pensions, citizenship, passports and other services when other administrative records, such as birth certificates, are required but no longer exist or were never issued. Regulations permit duly authorized representatives to act on behalf of a minor or an incompetent person to administer their affairs or estate. To do so, the trustees and estate administrators seek personal information from the census or from 1940 national registration records of deceased individuals, minors, or dependent adults. In the case of the deceased, the administrator of the estate may exercise these rights, but only for the purposes of estate administration.

For the 2023-2024 fiscal year, 1 request was made from an individual looking to obtain their 2021 Census of Population questionnaire.

Responding to privacy requests involved reviewing more than 20,817 pages, of which 7,669 pages were released. Twenty-four (24) requestors received information electronically and one (1) requestor received the information in paper format.

Fiscal Year	Requests Received	Requests Completed	Number of Pages Processed	Number of Pages Released
2023/2024	52	54	20,817	7,669
2022/2023	48	178	34,685	10,451
2021/2022	161	65	1,744	1,416
2020/2021	86	138	4,076	2,983
2019/2020	283	210	5,586	3,364

Other requests

During this period, Statistics Canada did not receive any *Privacy Act* consultation requests from other departments.

Disposition of completed requests

The disposition of the 54 requests completed in 2023-2024 was as follows:

- 4 were fully disclosed (7.4%)
- 21 were disclosed in part (38.9%)



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- 0 were exempted/excluded (0%)
- 12 did not exist (22.2%)
- 17 were abandoned by applicants (31.5%)

Completion time and extensions

Of the fifty-four (54) requests received and completed in FY 2023-2024, 52 requests were processed and completed within the time period prescribed in the *Privacy Act*, and 1 request was carried over to the next fiscal year. Several factors contributed to the timely response, including training sessions with senior leaders and liaison officers, as well as the reduction in the backlog of requests allowing analysts to focus on the new requests that were received in this timeframe. Extensions were taken for 5 requests.

The 54 requests completed in 2023-2024 were processed in the following time frames:

- 36 within 1 to 15 days (66.7%)
- 13 within 16 to 30 days (24%)
- 4 within 31 to 60 days (7.4%)
- 1 within 61 to 120 days (1.9%)

Complaints and investigations

Six new complaints were filed against Statistics Canada with the Office of the Privacy Commissioner (OPC). Nine complaints were closed with the following findings:

- One complaint was deemed Well-Founded, as Statistics Canada did not respond within the prescribed timeframe.
- Four complaints were discontinued.
- Two complaints were closed via Early Resolution process.
- Two complaints were deemed Not-Well Founded.

Two complaints were carried over to the next fiscal year, including one complaint that was received in 2021.

The statistical report provides aggregate data on the application of the *Privacy Act*. This information is made public annually and is included with the annual report (Appendix B).

Implementation: Privacy

The *Privacy Act* has a substantial impact on Statistics Canada, but the impact cannot be measured only by the number of requests processed. Although society seeks a broader range of detailed information, it also demands more accountability on the part of government about the collection of personal information and the purposes served by the information.

The Agency has a strong track record of respecting the privacy of Canadians and has taken a number of initiatives to address the privacy concerns of Canadians.

Statistics Canada has internal directives that reflect the basic principles found in the *Privacy Act*. The Agency's Directive on Informing Survey Respondents requires that all respondents be informed of the expected use of the statistics produced from the survey results, the authority under which the survey is taken, their obligation to respond, the confidentiality protection given to all information collected under the *Statistics Act*, and any data-sharing arrangements pursuant to provisions of the *Statistics Act*.

Statistics Canada also developed the Directive on Microdata Linkage to respond to concerns of both respondents and privacy advocates on the potential of matching an individual's information gathered from a variety of sources.

These two directives not only support compliance with the letter and the spirit of the *Privacy Act*, but also demonstrate the Agency's commitment to the protection and appropriate use of the personal information under its control, while still meeting its mandate.

The Agency has also developed and implemented a Necessity and Proportionality framework that ensures that any collection of personal information for its statistical programs is duly justified.

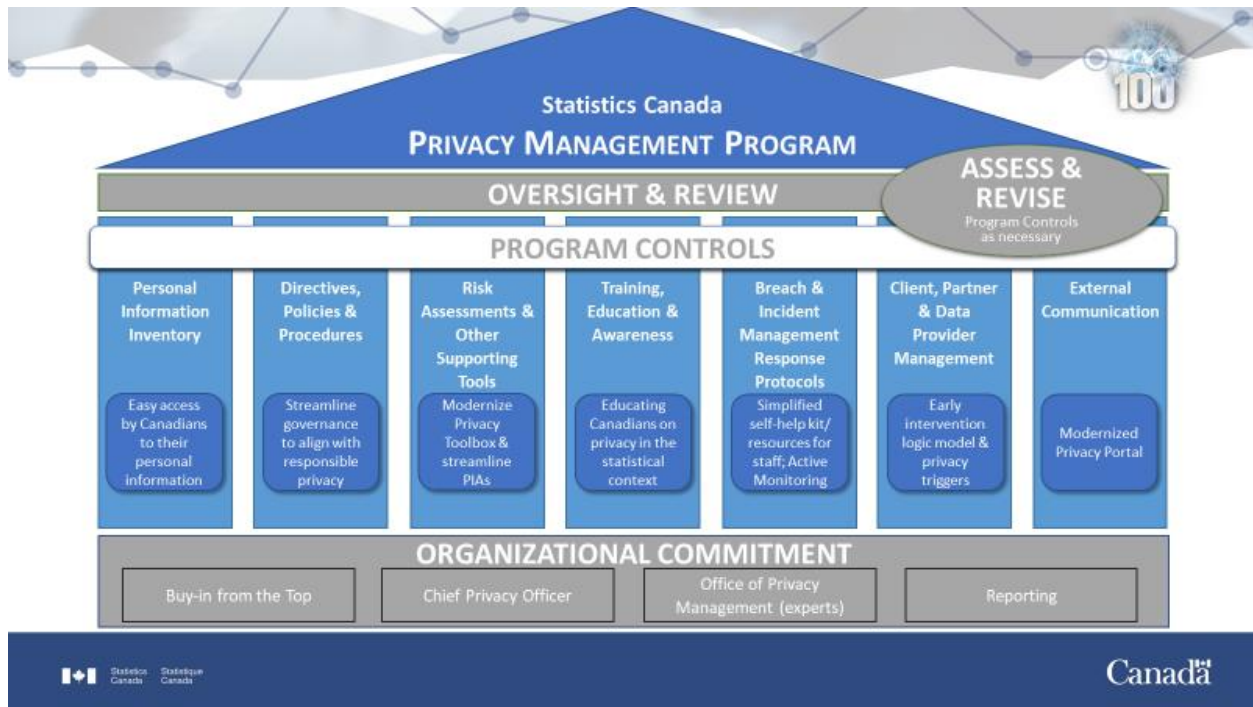
As we chart new paths and methods of collecting data, respecting and protecting the rightful privacy of Canadians sit at the heart of everything we do. Statistics Canada's Trust Centre underlines how we meet Canadians' information needs while keeping their data safe and private.

Statistics Canada continues to work diligently to ensure that the confidentiality it has committed to in law and in principle, is upheld. This includes ensuring that privacy remains at the forefront of all our activities.

Statistics Canada's very mandate requires that it produce information that helps Canadians better understand their country – its population, resources, economy, environment, society and culture. To achieve this, the Agency must collect a considerable amount of personal information directly from Canadians through surveys, or indirectly from private and public organizations. Parliament has given Statistics Canada this mandate to better serve Canadians, but with such authority comes great responsibility. Statistics Canada continually adjusts to new realities and adapts existing mechanisms or develops new ones to protect Canadians' privacy and ensure that their data will not be misused. The Agency must demonstrate and provide assurances to Canadians that it can be trusted with their information.

As Statistics Canada continues to modernize, it is committing to Responsible Privacy. Responsible Privacy is instrumental in honouring our promise to diligently collect, use, disclose and protect Canadians' personal information. It ensures that we indefatigably strive to go beyond what is required and encompasses innovative privacy checks and balances that ensure due diligence when handling personal information. It requires that privacy be imprinted in all our activities.

To foster the Responsible Privacy approach and meet the demands of a digital world in the 21st century, senior management at Statistics Canada has committed to a formalized Privacy Management Program (PMP). Statistics Canada's Privacy Management Programs ensures that the Agency is equipped to manage and protect any personal information in its custody and control. It provides transparency and accountability through a structured framework designed to ensure the protection of personal information and compliance with laws and regulations.



While many of its components were already part of the Agency's regular activities, the PMP instills a systematic and strategic approach that reinforces our commitment to Canadians regarding their personal information.

Costs

During 2023-2024, the ATIP Office incurred an estimated \$164,803 in salary costs and \$703 in administrative costs to administer the *Privacy Act*.

Training and Awareness

In 2023-2024, the Access to Information and Privacy (ATIP) Office expanded its formal training program for all staff across the Agency. Informal one-on-one training was made available, until such time as the formal training was implemented. The informal training assists staff in understanding their obligations under the Act, as well as informs them about policies and directives related to personal information at Statistics Canada. In 2023-2024, the ATIP Office continued to offer training on procedures to new liaison officers. There was very little turnover among the liaisons, who maintained their good relationship and open lines of communication with the ATIP Office.

Statistics Canada's Office of Privacy Management and Information Coordination offers courses on a variety of subjects related to the *Statistics Act* and the *Privacy Act* as well as supporting policies and directives. These include sessions on "Privacy Impact Assessment" and "Privacy and Confidentiality", with

a focus on personal information collected about employees of Statistics Canada, clients or the public, and appropriate use of such personal information.

Statistics Canada also requires employees to complete computer-based courses on confidentiality. A mandatory course for new employees offers a brief overview of confidentiality, illustrating its importance at the Agency.

Additionally, the Office of Privacy Management and Information Coordination (OPMIC) sponsored a Data Privacy Day in January 2024, which highlighted the activities and services provided by the Privacy Management Team. The OPMIC noted that there was a high level of engagement with strong feedback received. Bilateral meetings between the OPC and StatCan are occurring on a regular basis, where StatCan programs and activities are discussed.

Policies, Guidelines and Procedures

The ATIP Office has a variety of tools in place to ensure that ATIP sector contacts are well informed about their roles and responsibilities for coordinating privacy requests. These tools include a concise checklist outlining steps to follow when providing responsive records for privacy requests, and a responsible contact from the ATIP team throughout the process. There are also a variety of directives and policies provided by the Treasury Board Secretariat, about the protection of personal information. Personal and confidential information is protected by the *Privacy Act* and the *Statistics Act* and will only be disclosed as permitted by these Acts.

During the reporting period, updates to administrative procedures were made to facilitate the retrieval of human resource documents for ATIP. Given that requests for human resource documents are typically less intricate and more recurrent, new administrative procedures expedited access to these documents, thereby enhancing the efficiency of the retrieval process and response rates for requesters.

Statistics Canada developed and published a privacy framework that identifies the full scope of privacy controls within the operations of Statistics Canada as a collection of approved practices, procedures and governance related to privacy. This includes the identification of the Director, Office of Privacy Management and Information Coordination, as the Chief Privacy Officer (CPO) for Statistics Canada, as designated by the Chief Statistician. The CPO provides leadership on matters related to privacy, develops business strategies and processes that ensure that privacy is considered and accounted for in business decision, and ensures the safeguarding of the information through administrative policy instruments and best practices.

As the functional authority on statistical methods within the Government of Canada, StatCan has provided extensive inputs to the Treasury Board Secretariat (TBS) regarding the Privacy Implementation Notice on De-identification. TBS and StatCan have begun partnering on a multi-year initiative to develop a Framework on de-identification for the Government of Canada, which will include standards, guidance, and tools that will enable institutions to appropriately leverage de-identification as a privacy preserving technique.

Given its unique position in the federal government in collecting personal information solely for statistical and research purposes, Statistics Canada has determined that the privacy issues associated with its statistical activities undertaken under the authority of the *Statistics Act* could be addressed by means of a [Generic Privacy Impact Assessment \(PIA\)](#).

Although the Generic PIA is comprehensive and reflects most of Statistics Canada's operations, in the instance of extraordinary activities, specific PIAs are conducted with input from the Office of the Privacy Commissioner (OPC). Statistics Canada prepares supplements to the Generic PIA for all new and significantly redesigned surveys and statistical programs involving the collection, use or disclosure of personal information that raise unique or additional privacy, confidentiality or security risks that have not been addressed in the Generic PIA.

Initiatives and Projects to Improve Privacy

The ATIP Office uses the ATIP Online Reporting Tool to receive and respond to requests submitted electronically. During this reporting period, the Online Reporting Tool was updated to allow for release packages to be sent securely to requesters who created a profile. This method allows for documents to be sent securely, with larger packages being sent than can normally be accommodated via email.

The agency has decided to acquire the ATIPXpress software and is anticipating having the software beginning in the 2025-2026 fiscal year. Once the software has been implemented, the retrieval process will be streamlined and the amount of time it takes to process a request should be reduced.

Summary of Key Issues and Actions Taken on Complaints

Of the six complaints the Agency received, only one was deemed "Well-Founded", which was the result of the Agency not responding within the prescribed timeframe. The other complaints covered a range of concerns, and there was no single issue that indicated a systemic issue. Five of the complaints were submitted by two individuals.

Material Privacy Breaches

The Privacy and Information Breach Protocol provides clear identification of the various roles and responsibilities in the event of a breach. It includes the requirement to complete an enhanced process which incorporates the elements in the Treasury Board Secretariat's guidelines on how to respond to a privacy breach. The template has been approved by the Agency's senior management. At a minimum, the incident report will contain the following information:

- a description of the incident (who, what, when, where, why, how)
- the actions already taken and planned for the future
- a description of the risks/impacts
- any other information that might be helpful in locating any lost item(s) or in assessing the consequences of loss or compromise
- recommendations for mitigating or eliminating the risk of the event recurring in future
- information on whether the individuals or organizations whose information was breached were informed of the incident
- indication if the individuals, Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat will be informed of the incident and if not, a rationale for not informing them.

Best practices to eliminate or reduce future recurrences that are identified during an investigation must be communicated to other employees to prevent a recurrence of the breach.

Breaches are coordinated by a centralized group in the Privacy Management team to ensure that all programs impacted by the breach provide input.

There were 15 privacy breaches at Statistics Canada during the reporting period, and of these breaches, none were material in nature. A total of 6,513 people were affected by these 15 breaches.

Amongst the 6,456 people affected, 5,840 were the result of 1 incident related to a Webinar email invitation sent to external partners in CC rather than BCC, and 415 were the result of the government-wide Brookfield Global Relocation Services (BGRS) and SIRVA breach.

Privacy Impact Assessments

The Statistics Canada Directive on Conducting Privacy Impact Assessments (PIAs) specifies the roles and responsibilities of its senior managers and privacy specialists regarding the collection, use and disclosure of personal information. This directive applies to all statistical and non-statistical programs that engage in the collection, use or disclosure of personal information.

Statistics Canada's Generic PIA covers all aspects of the Agency's statistical programs that collect, use and disseminate information in support of the mandate under the *Statistics Act*. The Generic PIA addresses the ten privacy principles and includes a threat and risk assessment for various collection and access modes.

Supplements to the Generic PIA are produced for new and significantly redesigned collections, uses or disclosures of personal information that raise unique or additional privacy, confidentiality, or security risks. The Generic PIA and its supplements are posted on the Statistics Canada website: [Generic privacy impact assessment](#).

When it relates to the administration of the institution other PIAs are conducted for new or redesigned administrative programs and services that involve the collection, use and disclosure of personal information that are not addressed in the Generic PIA. Summaries of completed privacy impact assessments can be found on the Statistics Canada website: [Privacy impact assessments](#).

In the current reporting period, 21 privacy assessments, including three PIA, 14 supplements, and four amendments or addendums were approved and submitted to the Office of the Privacy Commissioner and the Treasury Board Secretariat. The following are brief descriptions:

Talent Bank Project

A privacy impact assessment was conducted to determine if there were any privacy, confidentiality or security issues associated with the Talent Bank project. The Talent Bank compiles information about Statistics Canada's employees' education, skills and learning interests. This information contributes to better decision-making about how to manage programs and policies to meet business objectives and engage employees to perform at their highest level. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Enterprise Service Management Solution

A privacy impact assessment for the Enterprise Service Management Solution was conducted to determine if there were any privacy, confidentiality, or security issues with this initiative and, if so, to make recommendations for their resolution or mitigation. The new solution integrates all the functions of service delivery formerly available through the outgoing systems and serves as a unique service request system for IT as well as a service request management system for internal service delivery areas. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

NetSupport

A privacy impact assessment was conducted to determine if there were any privacy, confidentiality and security issues associated with using NetSupport for Statistics Canada's Quality Control Monitoring Program, and if so, to make recommendations for their resolution or mitigation. To fulfill its mandate, the agency must maintain high standards for quality control and conduct effective performance management. The NetSupport software is a third-party application that addresses the need for visual observation during monitoring sessions of telephone interviews. The software enables supervisors to evaluate in real-time data collection clerks' skills, ensure data quality and identify areas for improvement in the interviewing process. The assessment of NetSupport did not identify any privacy risks that cannot be managed using existing safeguards.

Canadian Correctional Services Survey

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the expansion of the Canadian Correctional Services Survey (CCSS). This administrative data survey collects microdata on adults and youth electronically from correctional services programs in Canada and is being expanded to cover all provincial and territorial correctional services, as well as federal correctional services. The CCSS provides information to the justice community and the public on the nature and extent of crime and victimization and the administration of criminal and civil justice in Canada. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Early Learning and Child Care Arrangements – Children with Long-term Conditions and Disabilities

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Survey of Early Learning and Child Care Arrangements – Children with Long-term Conditions or Disabilities. This new voluntary survey aims to gather information from parents and guardians of children with one or more long-term condition or disability, aged 0 to 5, living in the provinces. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Collection of Police-reported Indigenous and Racialized Identity Data through the Uniform Crime Reporting Survey

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the expansion of the Uniform Crime Reporting Survey to collect information on the Indigenous and racialized identity of persons accused and victims of criminal incidents. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Canadian Agricultural Partnership Survey

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Canadian Agricultural Partnership Survey. This voluntary business survey is used to produce statistical information on agricultural organizations receiving funding through the cost-shared program of the Canadian Agricultural Partnership (CAP) initiative with the Agriculture and Agri-Food Canada, as well as to demonstrate outcomes and impacts of the program on the participants, their businesses, and the overall agriculture sector. Due to the need for more disaggregated data on the characteristics of employees of Canadian agricultural organizations that have participated in the CAP to address potential inequalities and disparities that may disproportionately affect underrepresented population groups, a section was added to the 2023 CAPS requesting aggregate sociodemographic information about the organization's workers (owners and employees). The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

2023 National Cannabis Survey

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the 2023 National Cannabis Survey. This voluntary household survey collects information on cannabis use behaviours, use of different cannabis products, money spent on cannabis products, change in consumption habits due to legalization, symptoms of impaired control over cannabis use, and cannabis use while driving. The 2023 cycle will additionally collect information on cannabis purchasing behaviours from both the legal and illegal markets and growing cannabis at home. This includes information about participation in illegal activities and sociodemographic content including indigenous identity, population group, sexual orientation, and long-term conditions (disability). The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Oral Health Statistics Program

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Oral Health Statistics Program. In response to Budget 2023, Statistics Canada established the Oral Health Statistics Program to collect data on oral health and access to dental care in Canada through an integrated comprehensive strategy focusing on two core activities: new oral health surveys and administrative data acquisitions and integration. This data strategy aims to collect data to assess and produce information on Canadians' self-reported oral health status, track changes in oral health care needs and oral health outcomes. The data strategy also enables Health Canada to track the performance of the interim Canada Dental Benefit (CDB) and the Canadian Dental Care Plan (CDCP), the impact of the CDB and CDCP on the Canadian dental infrastructure as well as self-reported measures

of the oral health of Canadians. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Survey Series on People and their Communities – Participation and Experiences in Community Sports – Wave 4

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the 4th wave of the Survey Series on People and their Communities – Participation and Experiences in Community Sports. This voluntary household survey collects information about the lived experiences of specific sub-populations in Canada, such as racialized groups and immigrants. Each survey collection in the series (Wave) contains questionnaire content that changes based on emerging data needs, with an overall aim of providing insights on intersections such as those between racialized identity and immigrant status with various social topics with specific data gaps related to the level of granularity of the data. Wave 4 collects new content about the respondents' participation in sport, with a focus on immigrants' and racialized peoples' experiences with unfair treatment, racism and discrimination as a victim or witness in sports and involvement in non-athletic roles in sport, combined with sociodemographic and other information collected from prior survey series waves. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Survey Series on People and their Communities – Social Cohesion and Experiences of Discrimination – Wave 5

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the 5th wave of the Survey Series on People and their Communities – Participation and Experiences in Community Sports. This voluntary household survey collects information about the lived experiences of specific sub-populations in Canada, such as racialized groups and immigrants. Each survey collection in the series (Wave) contains questionnaire content that changes based on emerging data needs, with an overall aim of providing insights on intersections such as those between racialized identity and immigrant status with various social topics with specific data gaps related to the level of granularity of the data. Wave 5 collects new content about respondents' feelings towards others and their experiences with unfair treatment, racism and discrimination, combined with sociodemographic and other information collected from prior survey series waves. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Human Rights Tribunal Project

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Human Rights Tribunal Project. Statistics Canada is conducting a pilot project to acquire administrative data on human rights tribunal cases in Canadian jurisdictions on a voluntary basis. The project aims to generate information on the impacts of filing a human rights complaint on complainants, up to, and following, resolution of the matter. More specifically, the project will aim to provide information on the characteristics of complainants of discrimination and harassment. It will also outline the outcomes of the complaints across social markers, which includes health, criminal justice system involvement, income, and other demographics (relationship status, employment status, etc.). The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Survey on Health Care Access and Experiences – Primary and Specialist Care

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Survey on Health Care Access and Experiences – Primary and Specialist Care. This new voluntary survey collects information on respondents' use of primary and specialist health care as well as issues related to access, including wait times, experiences of discrimination, barriers to care, unmet needs and their impacts on the individual. Results aim to inform the delivery of health care services, and to develop and improve programs and policies. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Intensive Rehabilitative Custody Supervision Project

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Intensive Rehabilitative Custody Supervision (IRCS) Project. Statistics Canada will acquire information from provincial/territorial correctional services programs in Canada on youth who participate IRCS programs in order to identify criminal justice system recontacts and perform outcome studies for the IRCS population. Understanding the impact of the IRCS programs is crucial for developing and altering programs to reduce recidivism and support youth rehabilitation. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Survey on Financing and Growth of Small and Medium Enterprises

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Survey on Financing and Growth of Small and Medium Enterprises (SFGSME). The 2023 SFGSME will ask new questions about the sociodemographic characteristics of both the primary decision maker and ownership of the enterprise. All sociodemographic questions include the response options "Prefer not to say" and "Don't know". The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

2024 Census Test

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the 2024 Census Test. The objectives of the Census Test which involves a sample of dwellings across the country are to determine whether new or revised questions under consideration for the 2026 Census of Population can be easily understood and correctly answered, to assess public reaction to these questions by testing them on a smaller scale basis, and to evaluate behaviour of staff when using new systems and procedures. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Canadian Survey on the Provision of Child Care Services

A supplement to the Generic PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with the Canadian Survey on the Provision of Child Care Services. This

voluntary survey collects information on the provision of childcare services in Canada for children ages 12 and under at the national, provincial, and territorial levels. Information about staffing levels and training, services provided, enrollment and daily fees is collected from licensed and unlicensed home-based and centre-based childcare providers. Starting with the 2024 survey cycle, four new sociodemographic questions pertaining to only home-based childcare operators will be asked. Respondents have the option to select the response “Prefer not to answer” or “Don’t know”, or to simply skip the demographic question. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Employee Wellness Surveys and Pulse Check Surveys – Systems Update

An amendment to the Employee Wellness Surveys and Pulse Check Surveys PIA was conducted to determine if there were any privacy, confidentiality or security issues associated with a systems update. Surveys are administered to employees of Statistics Canada to support the Human Resources Business Intelligence, Wellness and Transformation Division’s mandate to cultivating employee well-being. The change in systems resulted in a reduction of the number of employees with a need to access the data and increases the number of Pulse Check Surveys that can be conducted, and their timeliness in informing measures that enhance employee wellness in a rapidly evolving work environment. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Education and Labour Market Longitudinal Platform

An addendum to the Supplement to Statistics Canada’s Generic PIA related to the Education and Labour Market Longitudinal Platform (ELMLP) was conducted to determine if there were any privacy, confidentiality or security issues associated with the addition of datasets that pertain to elementary through to secondary school populations. The ELMLP is a platform of securely integrable and anonymized postsecondary education and apprenticeship datasets. The addition of the datasets aims to expand the scope of the platform and show how early education can affect trajectories of students all the way through to the workforce. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Survey on Mental Health and Stressful Events, Cycle 2

An addendum to the Supplement to Statistics Canada’s Generic PIA related to the Survey on Mental Health and Stressful Events was conducted to determine if there were any privacy, confidentiality or security issues associated with the addition of new questions to Cycle 2 of the survey. The new questions aim assess a wider range of potential risk factors for experiencing stressful events and to better characterize potential consequences of stressful events on mental health and participation in the labour force. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Canadian Covid-19 Antibody and Health Survey – Longitudinal Follow up to Cycle 2

An addendum to the Supplement to the Privacy Impact Assessment for the Canadian COVID-19 Antibody and Health Survey was conducted to determine if there were any privacy, confidentiality or security issues associated with the 2023 longitudinal follow-up questionnaire. For this voluntary follow-up survey, the respondents from cycle 2 who voluntarily provided a valid email address for follow-up will be contacted and asked to participate. The follow-up introduces new questions to determine the recency of COVID-19 infections, severity of symptoms, support for symptom management, and respondents' reliance on disability benefits or worker's compensation. The assessment did not identify any privacy risks that cannot be managed using existing safeguards.

Microdata Linkage

As outlined in Statistics Canada's Directive on Microdata Linkage, linkages of different records pertaining to the same individual are carried out only for statistical purposes and only in cases where the public good is clearly evident. One of the primary objectives of these linkages is to produce statistical information that facilitates a better understanding of Canadian society, the economy, and the environment.

All microdata linkage proposals must satisfy a prescribed review process as outlined in the directive. In addition to demonstrating the public benefit, each submission must provide details of the output. The public dissemination of any information resulting from microdata linkage, like all other statistical information, is only at an aggregate level which protects the confidentiality of the information of individuals.

In 2023-2024, there were 28 approved microdata linkages that involved personal information. A summary of these microdata linkages is found in Appendix C.

Public Interest Disclosures

No disclosures were made under paragraph 8(2)(m) of the *Privacy Act* during the reporting period.

Monitoring Compliance

At Statistics Canada, the ATIP Office processes and monitors requests by registering them in a comprehensive system known as Privasoft – Access Pro Case Management. An acknowledgement of the request is sent to the client and a retrieval form is forwarded to the relevant program area, Office of Primary Interest (OPI), for responsive records. If the OPI and/or the ATIP Office need to clarify the request, the ATIP Office contacts the client. Statistics Canada is currently working to procure a new software solution that will assist in modernizing and improving the processing of requests received by the Agency. The procurement process is being led by the Treasury Board of Canada Secretariat on behalf of the Government of Canada.



The retrieval form provided to the OPI was created by the ATIP Office at Statistics Canada and is based upon the Policy on Access to Information and the Directive on Access to Information Requests from the Treasury Board Secretariat of Canada. The form includes the text of the request, the name and phone number of the ATIP Officer, and the date by which records are required (normally 5 to 10 days). The form includes a checklist, which the OPIs complete to confirm that they have conducted a thorough search, and a recommendation schedule for identifying sensitive information and the specific nature of the injury that could be caused by release. The individual providing the records is asked to identify any records which may be sensitive in nature (e.g., legal issues, Cabinet confidences, personal information, company information, advice to the Minister), which may require consultations, and/or which may generate media interest. The Director General, or appropriate delegate, of the program area sign-off the form.

The ATIP Office assists the program areas with administrative procedures related to the retrieval of records. Once the documents are received from the OPI, the ATIP Office ensures a retrieval form is duly completed by the program executive. The OPI and program executives are reminded of the importance of responding to ATIP requests in a timely and comprehensive manner. The performance of OPIs to respond to requests for records is reported to senior management in a monthly dashboard, to ensure that any issues are identified and addressed.

When reviewing responsive records, if there are documents that were created by or pertain to another department, we only consult under the *Privacy Act* if we have reason to believe that redactions would be applied. Under the *Privacy Act* we seek to limit consultations as much as possible, to retain the confidentiality of the requester. For Privacy requests received this fiscal year, our only consultations have been to the Department of Justice where there was an active court case.

The information requested under the *Privacy Act* can typically be provided within the 30-day time period. Census information can be requested under the Act, or through the Census and Pension Search Centre. The volume of requests received by the organization is not onerous enough to necessitate creating an alternate method of availability.