

Personal Information Banks

Procedures Document

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Table of Contents

1. What are Personal Information Banks?	2
1.1 Three Types of PIBs	2
1.2 Classes of Personal Information	3
2. PIBs & Privacy Impact Assessments	3
3. Development of PIBs	4
4. Approval of PIBs	4
5. Modifying Existing PIBs	5
6. Terminating a PIB	5
7. Using Standard PIBs	5
8. Oversight.....	6
9. Questions and Feedback.....	6
Appendix A: PIB Fields	7
*Please refer to the Personal Information Bank Submission Form on the TBS Forms Page frequently to remain up-to-date.....	7
Appendix B: PIB Codes	9
Appendix C: Submitting Privacy Impact Assessments	11

1. What are Personal Information Banks?

A personal information bank (PIB) is a descriptive outline of personal information related to a government program or activity. All institutions subject to the *Privacy Act* must ensure the personal information under their control is described in a PIB if that personal information:

- has been used, is being used, or is available for use for an administrative purpose; or
- is organized or intended to be retrieved by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual.

PIBs are compiled and published on an institution's Info Source web page for openness and transparency and to support the individual's right of access to their personal information.

What is an "administrative purpose"?

The *Privacy Act* defines administrative purpose as "the use of [personal] information in a decision-making process that directly affects that individual."

1.1 Three Types of PIBs

Institution-Specific PIBs describe personal information about members of the public as well as current and former federal employees collected and used to administer a program or activity specific to a government institution. These PIBs are created and maintained by individual federal government institutions. The majority of PIBs fall into this category. Each institution-specific PIB must have at least one corresponding institution-specific Class of Record, which includes a description of all records and information maintained by the government institution and of the various document types that store the information.

Central PIBs describe personal information about members of the public as well as current and former federal employees that may be found in all or several government institutions and are maintained by a central federal institution, such as the Public Service Commission of Canada, Public Services and Procurement Canada, or the Treasury Board of Canada Secretariat (TBS). An example of a central PIB is TBS' Performance Management Program for Employees Bank (TBS PCE 754) which applies to all employees of the core public administration. Each central PIB has a corresponding institution-specific Class of Record.

Standard PIBs describe information about members of the public as well as current and former federal employees contained in records created, collected and maintained by most government institutions in support of common internal services (e.g., Employee Personnel Records, Access to Information Act and Privacy Act Requests, Public Communications). TBS is responsible for creating and updating standard PIBs. When a standard PIB does not sufficiently capture an institution's program or activity, an institution-specific or central PIB must be created or modified. Each standard PIB is associated with a related standard Class of Record.

*Please see [Appendix B](#) of this document for specific PIB codes.

1.2 Classes of Personal Information

There are occasions when an institution finds itself holding personal information that is not intended to be used for an administrative purpose or retrievable by a personal identifier. For example, information being collected incidentally; the institution is not actively soliciting it but receives it and must account for it. Examples include personal information in unsolicited correspondence, comments left on departmental websites, and the like.

Given that the *Privacy Act* requires institutions to document all personal information under their control, “classes of personal information” were created to account for personal information collected for non-administrative purposes. Classes of personal information are defined in [paragraph 11\(1\)\(b\)](#) of the *Privacy Act* and should be used instead of PIBs in these circumstances.

An example of a Class of Personal Information

Mailing Lists

This class of personal information contains the names and addresses of individuals who are on a mailing list to receive specific information or publications on departmental programs and activities. The lists are used by the [institution name] to distribute information and to respond to requests by individuals. The lists are updated on a continuing basis and are maintained for a minimum of two years.

2. PIBs & Privacy Impact Assessments

Section 4.1.7 of the *Directive on Privacy Practices* requires that the head of the institution (or the s.10 delegate) ensures the development process for new or substantially modified PIBs is aligned with the process for the development and approval of a privacy impact assessment (PIA) or privacy protocol. This means that when PIBs are submitted to TBS for approval and registration, **they must be accompanied by a completed PIA or privacy protocol.**

When is a PIA “complete”?

A PIA is complete when all privacy risks have been identified, a mitigation strategy has been proposed and implemented, and the final document has received institutional approval.

Sections C.2.2.9 through C.2.2.17 of the *Standard on Privacy Impact Assessment*, outlines the requirements for PIAs including the sharing and public reporting of the PIA.

Note that many sections of the PIA can be repurposed for use in developing a PIB .

3. Development of PIBs

Sections C.2.2.1 and C.2.2.2 of the *Standard on Privacy Impact Assessment* requires that PIBs be created or substantially modified before programs or activities begin creating, collecting or handling personal information. Ideally, the Office of Primary Interest (OPI) will involve departmental privacy officials or its Legal Services Unit for guidance and advice whenever new programs or activities are undertaken which involve personal information.

Whenever personal information is collected and used for an administrative purpose, it must be accounted for in a PIB.

New PIBs must be registered with TBS, which is responsible for assigning registration numbers. Institutions must contact TBS to receive a registration number for standard PIBs.

Once a PIB is registered or substantial modifications are approved by TBS, it must be published on the institution's *Info Source* webpage, as per the [*Info Source* Online Publishing Requirements](#).

All PIBs should be approved and registered prior to publication, in accordance with subsection 71(4) of the *Privacy Act* and Appendix C of the *Directive on Privacy Practices*.

4. Approval of PIBs

Subsections 71 (3) and (4) of the *Privacy Act* stipulate that:

(3) [...] the designated Minister shall cause to be kept under review the utilization of existing personal information banks and proposals for the creation of new banks and shall make such recommendations as he considers appropriate to the heads of the appropriate government institutions with regard to personal information banks that, in the opinion of the designated Minister, are under-utilized or the existence of which can be terminated.

(4) [...] no new personal information bank shall be established and no existing personal information banks shall be substantially modified without approval of the designated Minister or otherwise than in accordance with any term or condition on which such approval is given.

TBS approval is sought by sending a copy of the PIB(s) and PIA(s) from the institution's official responsible for s.10 of the *Privacy Act*, to [the Privacy and Responsible Data Division](#). Changes may be required by TBS should the new or substantially modified PIB not match the information provided in the PIA. In this case, the institution will be required to resubmit the PIB once the changes have been resolved. Once the PIB has been approved by TBS and, if needed, a registration number has been issued, the PIB must be published on the institution's *Info Source* webpage as per the [publishing requirements](#).

Note that while all PIBs must be published on an *Info Source* webpage in both official languages simultaneously, TBS will accept PIBs in either official language for the approval and registration process.

5. Modifying Existing PIBs

To ensure that *Info Source* adequately reflects personal information under the control of institutions, PIBs must be updated whenever programs or activities change their privacy practices (all practices related to the creation, collection, retention, accuracy, correction, use, disclosure, or disposal of personal information). Program areas should engage their departmental privacy officials when such changes are considered so that PIBs may be amended accordingly. This stands true for consistent uses where the original purpose and the proposed purpose are so closely related that an individual would expect the information would be used for the proposed purpose, even if the use is not spelled out.

Note that [subsection 9\(4\)](#) of the *Privacy Act* requires that the Office of the Privacy Commissioner be informed of all new consistent uses of personal information.

An institution's official responsible for s.10 of the *Privacy Act* must send a copy of the old PIB and the newly revised PIB, with the changes highlighted, to [the Privacy and Responsible Data Division](#) for approval.

6. Terminating a PIB

If an institution no longer has under its control personal information as described in a PIB, the PIB is no longer required and should be terminated. This occurs when programs or activities are ended, suspended, or transferred to another institution. In any case, an institution's official responsible for s.10 of the *Privacy Act*, ATIP coordinator, or senior official responsible for privacy must contact [the Privacy and Responsible Data Division](#) to inform TBS that the PIB (cite the PIB number and TBS registration number) is no longer required.

To facilitate the right of access and as a courtesy for *Info Source* users, the institution should include in their publication a note describing the status of the records formerly found in the PIB. For example, the Disposition Authorization may require that the institution keep the records for a set amount of time, prior to destroying them, sending them to Library and Archives Canada, or transferring them to another institution. This note should stay on the *Info Source* webpage for at least one year after the PIB termination.

7. Using Standard PIBs

Nearly 50 standard PIBs have been created by TBS to describe personal information that may be found in records created, collected, and maintained by most federal government institutions to support common internal services.

If an institution is collecting/using the personal information described in a standard PIB, the institution may adopt it for use. However, institutions should confirm from time to time that they are not collecting or using personal information beyond that which is described in the standard PIB. If that is the case, an institution-specific PIB must be created.

An e-mail from the institution's official responsible for s.10 of the *Privacy Act* to [the Privacy and Responsible Data Division](#) is required to register against a standard PIB. Once registered, the institution must include the title of the standard PIB on its *Info Source* webpage.

8. Oversight

PIBs only support the right of access in so far as they are complete, accurate, and up to date. Subsection 71(1) of the *Privacy Act* requires the designated Minister (the President of the Treasury Board) to review how PIBs are “maintained and managed to ensure compliance with the provisions of this Act and regulations relating to access by individuals to personal information contained therein.” As such, PIBs will be reviewed to ensure they are of sufficient quality to be useful, and consistent with quantity reported to TBS.

9. Questions and Feedback

All questions concerning this document and any aspect of the PIB development, approval, and registration process should be directed to [the Privacy and Responsible Data Division](#).

Appendix A: PIB Fields

*Please refer to the [Personal Information Bank Submission Form](#) on the TBS Forms [Page](#) frequently to remain up-to-date

Appendix B: PIB Codes

Code	Description
Institution-Specific	
PPU: Public Bank	Institution-Specific Public Banks describe personal information about members of the general public that is contained in the records of a specific government institution.
PPE: Particular Bank	Institution-Specific Particular Banks describe personal information about current and former Government of Canada employees that is contained in the records of a specific government institution.
Central	
PCE: Central Bank	Central Banks describe personal information about current and former Government of Canada employees from all or several government institutions and are maintained by central government departments and agencies such as the Public Service Commission of Canada, Public Services and Procurement Canada, or the Treasury Board of Canada Secretariat.
PCU: Public Central Bank	Public Central Banks describe personal information about members of the general public from all or several government institutions and are maintained by central government departments and agencies such as the Public Service Commission of Canada, Public Services and Procurement Canada, and the Treasury Board of Canada Secretariat.
Standard	
PSE: Employee Standard Bank	Employee Standard Banks describe personal information about current and former Government of Canada employees that may be found in records created, collected, and maintained by most government institutions to support common internal functions, programs, and activities such as staffing, training and development, and employment. Standard Personal Information Banks are created by Treasury Board of Canada Secretariat.

PSU: Public Standard Bank	Public Standard Banks describe personal information about members of the general public that may be found in records created, collected, and maintained by most government institutions to support common internal functions, programs, and activities such as communications, travel, and employment. Standard Personal Information Banks are created by Treasury Board of Canada Secretariat.
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Appendix C: Submitting Privacy Impact Assessments

Use the [Privacy Impact Assessment \(PIA\) online submission portal](#) to send your approved PIA and related documents to the Office of the Privacy Commissioner of Canada and the Treasury Board of Canada Secretariat. The submission portal automatically sends the information you submit to both the OPC and TBS.

To send documents above Protected B, contact the OPC by email at scg-ga@priv.gc.ca, and TBS at ippd-dpiprp@tbs-sct.gc.ca.