Personal Information Banks Procedures Document

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1. What are Personal Information Banks?

The *Privacy Act* requires that all subject institutions must ensure that the personal information under their control is described in Personal Information Banks (PIBs). These banks are compiled and published in *Info Source* in order to support the individual's right of access to their personal information.

Section 10(1) of the *Privacy Act* states that PIBs are required whenever an institution collects personal information which falls into one of two categories:

- personal information has been used, is being used or is available for use for an administrative purpose, which the Privacy Act defines as being used in a decision making process which directly affects that individual OR
- personal information 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. An
 identifying number could include the Social Insurance Number, Personal Record Identifier
 (PRI) or any other number.

If personal information is being collected but does not fall into one of the above categories, it must be accounted for in a class of personal information (see section 1.4 for a description of "class of personal information").

A PIB does not actually contain personal information; rather, it describes personal information contained in records (which should be captured in official record keeping systems). Note that personal information under the "control" of a government institution does not just mean physical custody - a record is under the control of a government institution when that institution is authorized to grant or deny access to the record, to govern its use and, subject to the approval of the Librarian and Archivist of Canada, to dispose of it. ATIP Officials can seek guidance from the Information and Privacy Policy Division (IPPD) at the Treasury Board of Canada Secretariat (TBS), via the IPPD Contact Centre, in situations where the notion of "control" is unclear.

Alternatively, ATIP officials can seek guidance from their departmental Legal Services Unit.

PIBs are created for programs or activities, not for databases or systems, which are simply used to store personal information, much the same as file folders are used with hard copy documents.

1.1 Types of PIBs

There are three types of PIBs:

- Institution-Specific PIBs: describe personal information that is collected and used to administer a program or activity specific to a government institution. Each Institutionspecific PIB must have at least one corresponding Institution-specific Classes of Record. These PIBs are created and maintained by federal government institutions. The majority of PIBs fall into this category.
- 2. Standard PIBs: these PIBs are created and maintained by the Treasury Board of Canada Secretariat (Information and Privacy Policy Division) and describe personal information that is contained in records of most government institutions to support common internal services (e.g. Employee Personnel Files, Access to Information and Privacy requests, Public Communications and so on). Each Standard PIB has a corresponding Standard Class of Record. Standard PIBs and Standard Classes of Record are described on the Info Source website.
- 3. Central PIBs: describe personal information that may be found in all or several government institutions and are maintained by a central federal government department or agency, such as the Public Service Commission, Public Works and Government Services Canada, or TBS. An example of a central PIB is the Public Service Commission's "Appeal Hearings" Bank (PSC PCE 708) which applies to all public servants across government who may lodge or be the subject of an appeal concerning an internal appointment. Each Central PIB has a corresponding Institution-specific Class of Record.

1.2 PIB Codes

Each of the three types of PIBs listed above are relevant for either the general public or government employees. The difference can be determined by examining the PIB Code, which forms part of the PIB number; they are explained below. Note that these codes are NOT acronyms.

Code	Description
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.
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 Works and Government Services Canada, and the Treasury Board of Canada Secretariat.
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 communications, travel 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.
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 Works and Government Services Canada, and the Treasury Board of Canada Secretariat.

1.3 Classes of Record

The records created, collected and maintained with respect to a particular institutional program or activity are called Classes of Record¹. Each PIB must have a related Class of Record, which describes the records which have been created to support a particular institutional program or activity. Institutions assign numbers to their classes of record in accordance with their own internal policies and procedures.

TBS has developed a number of Standard Classes of Record which describe records created, collected and maintained by most government institutions in support of common internal functions, programs and activities (see *Info Source* for additional examples). Institutions may include one or more of these standard descriptions in their *Info Source* chapters rather than develop their own.

An example of a Class of Record

Hospitality

Description: Includes records related to hospitality. Hospitality is the provision of a reception, meal or entertainment to guests of federal institutions, including social events or ceremonies in accordance with established policies and guidelines. Records may include information about the nature, scope, location, costs and type of function, including any event requiring special authority and approval by the appropriate delegated officials. The records may also include information related to the proactive disclosure of relevant hospitality expenses as required by the Treasury Board of Canada Secretariat, the Privy Council Office and/or institution-specific policies and procedures.

Document Types: Lists of attendees, locations, dates, and expenses, event protocols, hospitality policies and guidelines, financial signing authorities, and, where applicable, documents related to the mandatory on-line publication of hospitality expenses.

Record Number: PRN 933

TBS has developed a template for institutions to use when creating their own classes of record, which is attached as Appendix A.

¹ Classes of Record were formerly called "Program Records" which is why the number still has the preface "PRN" (i.e. Program Record Number).

1.4 Classes of Personal Information and Privacy Protocols

There are occasions when an institution finds itself holding personal information which is

not intended to be used for an administrative purpose or retrievable by a personal identifier. This information can be thought of as being collected incidentally; the institution is not actively soliciting it, but receives it and must account for it. Examples include personal information on unsolicited correspondence, comments left on departmental websites, and the like. Personal information may also be collected for non-administrative purposes when institutions conduct research activities or statistical analyses.

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.

Section 6.2.15 of the Policy on Privacy Protection stipulates that personal information collected for non-administrative purposes must be accounted for in an institution's Privacy Protocol. This Protocol establishes how the personal information being collected for non-administrative purposes is to be handled throughout its life cycle.

Given that *the Privacy Act* requires institutions to document *all* personal information under their control, "classes of personal information" were created in order to account for personal information collected for non-administrative purposes. Classes of personal information are defined in section 11(b) of the *Privacy Act*.

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.

The following flowchart can help determine when to use a PIB and when to use a Class of Personal Information.

Class of Personal

Information¹

Class of Personal Personal Information¹ Collected Information incidentally? Collected Personal Information Bank² Personal Information Bank² Used for an **Administrative** Purpose? **Class of Personal** Information¹ Organized or Personal Information Bank²

FLOWCHART: PIBs or Classes of Personal Information

Notes:

intended to be retrieved by Personal

Identifier?

¹ Classes of Personal Information are covered by the institutional Privacy Protocol

² Personal Information Banks require a Class of Record and development of Privacy Impact Assessment

2. PIBs and Privacy Impact Assessments

Under section 6.3.1 of the Directive on Privacy Impact Assessment, institutions must initiate a Privacy Impact Assessment (PIA) for a program or activity in the following circumstances:

- 1. when personal information is used for or is intended to be used as part of a decision- making process that directly affects the individual;
- upon substantial modifications to existing programs or activities where personal information is used or intended to be used for an administrative purpose; and
- when contracting out or transferring a program or activities to another level of government or the private sector results in substantial modifications to the program or activities.

Section 6.1.4 of the Directive on Privacy
Practices requires that the development
process for new or substantially modified
PIBs is aligned with the process for the
development and approval of the PIA. This
means that when PIBs are submitted to TBS

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.

for registration or approval, they must be accompanied by a PIA. Note that many sections of the PIA can be repurposed for use in developing in PIB and vice versa (see Appendix B).

Section 6.3.12 of the Directive on Privacy Impact Assessment requires that PIAs must obtain endorsement from:

12 the official responsible for section 10 of the *Privacy Act*;

2 appropriate senior officials or executives; and,

Ithe institution's legal services unit where the legal authority for the program is unclear or where there exists potential for issues with respect to the Charter of Rights and Freedoms to be raised.

Approved PIAs must be sent to the Office of the Privacy Commissioner and TBS (IPPD) upon completion. Electronic copies may be sent to the IPPD Contact Centre; print copies to the Information and Privacy Policy Division (Attn: Privacy Policy Team) 90 Elgin Street, 4th Floor, Ottawa, ON K1P 0C6. (See the Template Letter attached as Appendix C).

3. Development of PIBs

Personal Information Banks must be created *before* programs or activities begin. Ideally, the Office of Primary Interest (OPI) will involve the ATIP office or their 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. TBS has developed a PIB Electronic Checklist Tool to assist institutions in completing the required fields² of PIBs, which are described below:

Field	Description
Institution Contact Information	The name, phone number and e-mail address of the institutional ATIP office.
Title of PIB	The name of the program or activity (not system or database)
Description	A description of the personal information associated with this PIB. Also includes descriptors such as name, contact information, biographical information, biometric information, identifying numbers, Citizenship status, criminal information, credit history, dates of birth and/or death, educational information and so on.
	A listing of categories of personal information for use in PIBs is provided on the Info Source website.
Note field	This optional field can be used:
	 if specific information must be included when submitting an access request (e.g. case numbers, dates of correspondence, and so on)
	if the program or activity ceased to exist in a given year
	if the PIB changed names and/or numbers
	if the PIB was transferred to or from another institution
	 if there is information that does not logically fit in any other area (such as the systems which support the program or activity)
Class of individuals	Identifies the individuals about whom the personal information is being collected (e.g. general public, current and former federal government employees, individuals in receipt of a specific benefit and so on)

Treasury Board of Canada Secretariat

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² This PIB Electronic Checklist Tool is a macro-enabled Word document which walks institutions through all fields required for PIBs. Note that there are some fields in the checklist which do not appear in final PIBs (e.g. Social Insurance Number, Privacy Impact Assessments), but which should be considered when developing PIBs.

Field	Description
Purpose of collection	Why the information is being collected, including the legislated authority (usually a specific Act of Parliament) for collection. The purpose could be to administer a specific program, or determine eligibility for a specific benefit, disburse funds for a specific program and so on.
Social Insurance Number	If the Social Insurance Number (SIN) is collected, the authority must be cited. The SIN cannot be collected without specific authority. See the Directive on Social Insurance Number for more details.
Consistent Uses	All uses which have a reasonable and direct connection to the program or activity must be included. For example, information may be disclosed for investigative purposes, to report to senior management, for the conduct of audits or evaluations, for safety or security purposes, and so on.
	If this PIB already exists and is being revised to include new consistent uses, section 9(4) of the Privacy Act requires that the Office of the Privacy Commissioner must be informed and the new use be included in Info Source.
	Information sharing must also be reflected here, which could include sharing with other government departments or agencies, within other divisions or branches of the institution, with parties to a dispute/hearing/proceeding, with provincial, territorial or foreign government or the private or not-for-profit sector (specify).
	If information is shared with another government institution, their PIB which accounts for this information must be cited.
Privacy Impact Assessment	A PIA must be developed for all new or substantially modified programs or activities. The date of the relevant PIA must be included here, or date of anticipated conclusion of the PIA, if it is underway but not yet complete at the time of submission of the PIB.
	Remember that the PIA and PIB must be completed prior to the program taking effect and personal information being collected.
Retention and Disposal Standards	Linked to the Records Disposition Authority (below), these Standards delineate how long records will be kept by the institution, and what happens to them after this point is reached. These standards are obtained from the institution's Information Management group.
Records Disposition Authority (RDA)	Issued by Library and Archives Canada (LAC), the RDA enables government institutions to dispose of records which no longer have institutional value and are not required to meet legal or other requirements either by permitting their destruction or their transfer to LAC. These numbers are obtained through the institution's Information Management group.
Related Record Number	The Class of Record number which describes the records found in the PIB.

Field	Description
PIB Number	Created by the institution using the Federated Identity Program acronym, the PIB code (either PPU or PPE) and a unique institutionally-assigned reference number. The reference number must be three digits long (e.g. 001). See section 1.2 for examples.
TBS Registration Number	TBS-issued number indicating that the PIB has been registered and entered in our database.
	ALL PIBS MUST HAVE A TBS REGISTRATION NUMBER PRIOR TO PUBLICATION.
Last updated	The year in which the PIB was last revised.

If this is a new PIB, it must be registered with TBS, who will assign a registration number. If an institution is replacing an existing institution-specific PIB with a Standard PIB, the institution must contact TBS in order to receive a registration number for the Standard, even though it won't appear in the *Info Source* chapter; this is to enable TBS to keep track of how many PIBs are registered for each institution.

If a PIB is to be transferred to another institution (see section 5.1 Transferring a PIB from One Institution to Another) or if a PIB is being transferred from another institution, please contact the IPPD Contact Centre to have PIB registration numbers adjusted.

All new or substantially modified PIBs must be approved by the designated Minister <u>BEFORE</u> implementing the new or modified program or activity.

Once the PIB is registered with TBS, it can be published in the institution's *Info Source* chapter. See the next section, 4.0 Approval of PIBs, for more information on how PIBs are to be approved.

4. Approval of PIBs

Subsection 71 (3) and (4) of the *Privacy Act* stipulates 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.

Approval is sought by sending a copy of the PIBs from the ATIP Coordinator or explicitly stating on the ATIP Coordinator's behalf to the IPPD Contact Centre. If changes are proposed by TBS, the institution must make those changes and resubmit the PIB for approval. Once the PIB has been approved by TBS and a registration number has been issued, the PIB may be published in the institution's *Info Source* chapter.

Note that all PIBs must be published in *Info Source* in both official languages at the same time, although TBS only requires that one language be submitted for the approval and registration process. (See section 3.0 Development of PIBs for more details).

4.1 Institutions that have received delegated authority to approve PIBs

Under subsection 71(6) of the *Privacy Act*, the President of the Treasury Board may delegate authority to approve PIBs to institutions under Schedules 1, 1.I and 2 of the *Financial Administration Act*.

Institutions which have received this delegated authority may approve new and substantially modified PIBs themselves. Institutions are expected to put in place procedures to ensure that PIBs are approved by the appropriate official prior to publication in *Info Source*. This means that rather than sending PIBs to TBS for approval prior to registration, approval is to be granted according to the institution's internal processes.

The Delegation Order includes specific Terms and Conditions, listed in Appendix D, which outline the circumstances under which delegation has been granted, the violation of which may result in revocation of delegation. PIBs must still be registered with TBS after having been approved internally. Note that all PIBs must be published in *Info Source* in both official languages at the same time.

The section on Development of PIBs provides more details on how to create PIBs.

5. Modifying Existing PIBs

In order to ensure that *Info Source* adequately reflects personal information under the control of institutions, PIBs must be updated whenever programs or activities change. Ideally, Offices of Personal Information Banks Procedures Document

Primary Interest should inform their ATIP offices of any change in collection, use, disclosure, sharing or disposition of personal information so that PIBs may be amended accordingly.

Note that Section 9(4) of the Privacy Act requires that the Office of the Privacy Commissioner be informed of all new consistent uses of personal information.

Institutions must send a copy of the old PIB and the newly-revised PIB, with the changes highlighted, to the IPPD Contact Centre for approval. (See section 4.0 on Approval of PIBs). Institutions with delegated authority to approve their own PIBs must simply publish amended PIBs once approved internally.

5.1 Transferring a PIB from one institution to another

A PIB must be transferred from one institution to another when a program or activity (and the records containing the personal information) has been officially moved from one government institution to another. In this case, each ATIP coordinator must send an e-mail to the IPPD Contact Centre confirming that the transferring institution and the receiving institution agree to the transfer of records so that TBS can update the registration database.

To facilitate the right of access and as a courtesy for *Info Source* users, the institution which is no longer responsible for the PIB must include in their chapter a note indicating that records in this Bank have been transferred to the receiving institution and can be found in the receiving institution's PIB (include the number). The note should stay in place for at least a year after the transfer, whereupon it can be removed.

5.2 Removing a PIB

If an institution no longer collects personal information as described in a PIB, the PIB is no longer required. This occurs when programs or activities are suspended, or transferred to another institution (see the previous section for details). In either case, the ATIP coordinator must contact the IPPD Contact Centre to inform TBS that the PIB (cite the PIB number and TBS registration number), is no longer required so that TBS can update the registration database.

To facilitate the right of access and as a courtesy for *Info Source* users, the institution should include in their chapter a note describing the status of the records formerly found in this Bank. For example, the Records Disposition Authority may require that the institution keep the records for a set amount of time, prior to destroying them or sending them to Library and Archives Canada. Or the records may have been transferred to another institution (see section 5.1 on Transferring PIBs from one institution to another). This note should stay in the *Info Source* chapter for at least one year after the PIB is removed, whereupon it can be removed. Treasury Board of Canada Secretariat

Institutions are expected to work with their Information Management areas in order to ensure that records represented by the PIB are appropriately handled in accordance with the Records Disposition Authority.

6. Using Standard PIBs

A number of Standard PIBs have been created by the TBS to describe personal information that may be found in records created, collected and maintained by most federal government institutions to support common internal functions, programs and activities. Institutions may opt to use these Standard Personal Information Banks rather than develop Institution Specific Personal Information Banks.

If an institution is collecting/using the personal information described in a Standard PIB, then the institution may "register against it" (i.e. adopt it for use). The advantage of this is that the PIB does not have to be developed or maintained by the institution; however, institutions should confirm from time to time that they are not collecting personal information in excess of that which is described in the Standard PIB. If that is the case, an Institution Specific PIB must be created (see section 3.0 for details).

An e-mail from the ATIP coordinator to the IPPD Contact Centre is required to register against a Standard PIB. Once registered, the institution must include the title of the Standard PIB in its *Info Source* chapter.

7. Exempt Banks

Section 18 of the Privacy Act allows for the creation of "exempt banks", which contain files predominately related to international affairs and defence, or law enforcement and investigation. The head of a government institution may refuse to disclose any information held in such a bank, keeping information exempt from public access. Individuals are neither accorded access to the information, nor are they aware of its existence. Therefore, it is incumbent upon institutions to ensure that the composition of such banks is restricted to files that legitimately warrant inclusion.

As per section 6.2.16 of the Policy on Privacy Protection, government institutions must consult with TBS on any proposal for the establishment or revocation of an exempt bank, which begins with a request to the Designated Minister (i.e. the President of the Treasury Board) to establish an exempt personal information bank. As required by section 6.1.7 of the Directive on Privacy Practices, this request must include:

② A description of the information to be included in the exempt bank and why such information should be included in an exempt bank;

- ② Confirmation that the files in the bank consist predominantly of personal information as described in section 21 or 22 of the *Privacy Act*;
- The specific exemption provision under which the information requires protection and, for any injury test exemption, a statement of the expected detrimental effect;
- An explanation, including cost implications, of why the information should be placed in an exempt bank rather than assessing whether it can be released on a case-by-case basis; and,
- A draft Order in Council along with a draft Regulatory Impact Analysis Statement.

Section 36 of the *Privacy Act* gives the Office of the Privacy Commissioner the express power to carry out investigations of the files contained in any exempt bank and to provide a report to the head of the institution of any file which, in the Commissioner's opinion, should not have been included in the bank.

Prior to considering the creation of an exempt bank, institutions should consult with their OPI and their Departmental Legal Services Unit for guidance.

8. Oversight

PIBs only support the right of access insofar as they are complete, accurate and up-to-date. Subsection 71(1) of the *Privacy Act* requires the Designated Minister (i.e. 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 from time to time to ensure they are of sufficient quality to be useful. This is accomplished in several ways:

- Institutions subject to the Management Accountability Framework (MAF) assessments will have the quality of their PIBs verified on an annual basis. Institutions not subject to MAF will have their PIBs assessed by TBS on a rotational basis.
- Por those institutions who have delegated authority to approve their own PIBs, all terms and conditions of delegation must be adhered to; otherwise, delegation may be revoked.
- Section 36 of the *Privacy Act* empowers the Privacy Commissioner to review files contained in an exempt bank and make recommendations that the Commissioner considers appropriate.

9. Feedback and Questions

Those responsible for PIBs, PIAs, Privacy Protocols and *Info Source* are encouraged to share best practices within their institution and the larger ATIP community. All questions concerning this document and any aspect of the PIB development, approval and registration process should be directed to the IPPD Contact Centre.

10. Acronyms

ATIP	Access to Information and Privacy
IPPD	Information and Privacy Policy Division
MAF	Management Accountability Framework
OPC	Office of the Privacy Commissioner
ОРІ	Office of Primary Interest: the office responsible for the program under consideration
PCE*	Central Bank
PCU*	Public Central Bank
PIA	Privacy Impact Assessment: an evaluation of privacy risks associated with a program or activity, and mitigating strategies. See the Directive on Privacy Impact Assessment for more details.
PIB	Personal Information Bank, a collection or grouping of personal information described in section 10 of the <i>Privacy Act</i>
PPE*	Institution-Specific Particular Bank
PPU*	Institution-Specific Public Bank
PRN	Program Record Number: the former name of Classes of Record
PSE*	Employee Standard Bank
PSU*	Public Standard Bank
RDA	Records Disposition Authority: issued by Library and Archives Canada, this gives institutions the authority to dispose of records that are no longer needed for operational or legal purposes.
TBS	Treasury Board of Canada Secretariat

^{*} Note that PIB codes are *not* acronyms, but their definitions have been included here for ease of reference.

11. Appendix A: Class of Records Template

Title:

Mandatory

Must reflect the records being described.

Description:

Mandatory

Identifies the records created, collected and maintained by the institution as evidence of and information about a particular institutional program or activity.

Must provide sufficient information for the general public to understand the program/activity to which the records relate.

Note:

Optional

Describes relevant information that is not captured by other fields; for example, former name of a program or date a program ceased.

Document Types:

Mandatory

Identifies specific document types.

For example: contracts, statements of work, proposals, evaluation criteria, memoranda, procedures, policies, etc.

Format:

Optional

Specifies non-standard record format.

This field should be used only for non-standard record formats; e.g. audio tapes, video tapes, photographs, specific types of database software.

Note: Do not list electronic or paper formats.

Record Number:

Mandatory

Unique number created by institution using:

- the institution's Federal Identity Program acronym or commonly used acronym
- unique file/identification number used within the institution to identify the records.

12. Appendix B: PIA and PIB Crosswalk

PIB elements	PIA sections
Institutional Contact Information	No crosswalk
Title of PIB	Section 1: Name of Program or Activity
Description of information described by the PIB	Section 3: Personal Information Elements
Personal information in the PIB may include	Section 3: Personal Information Sub-elements
Note (optional field)	No crosswalk
Class of Individuals about whom personal information is collected and described in this PIB	Section 1: Overview
Purpose for collection	Section 1: Overview
Authority for collection	Section 1: Legal Authority for Program or Activity
Authority for collection of Social Insurance Number	Section 5: Collection Authority (question 2)
Consistent uses	Section 1: Overview
Information in this PIB may be shared with	Section 4: Internal/External use and disclosure
Retention and Disposal Standards	No crosswalk
Retention and Disposal Authority	No crosswalk
Related Class of Record Number	Section 1: Overview
PIB number	Section 1: Overview
TBS Registration number	TBS to provide
Last updated	No crosswalk

13. Appendix C: Template Letter for Submission of PIAs

• • • • • • • • • • • • • • • • • • • •		
Privacy and Responsible Data Division	Office of the Privacy Commissioner of Canada	
Treasury Board Secretariat	30 Victoria Street	
90 Elgin Street, 4 th Floor	112 Kent Street, Suite	
Ottawa, ON, K1A 0R5	Gatineau, QC K1A 1H3	
ATTN: Privacy Policy Team	ATTN: PIA Review Team	
·	.15 of the Directive on Privacy Impact Assessment, mpact Assessment entitled	
ir	n support of the program/activity	
·	. This PIA was initiated on	
DD-MM-YYYY, and received final approval the <i>Privacy Act</i> , on DD-MM-YYYY.	from, who is the official responsible for Section 10 of	
Furthermore, I confirm that:		
A Personal Information Bank has be	en included in this submission;	
 A summary of this PIA will be posted of section 6.3.16 of the Directive on 	d on the institutional website as per the requirements Privacy Impact Assessment; and,	
• • • • • • • • • • • • • • • • • • • •	et, with partners or other government institutions, in egal and confidentiality requirements.	
For more information, please do not hesita	ate to contact me at [phone/email].	
Sincerely,		
ATIP Coordinator Institution Name and Address		

14. Appendix D: Terms and Conditions of Delegation

Note that these apply to institutions listed in Schedules 1, 1.I and 2 of the *Financial Administration Act*.

- 1. No new Personal Information Bank shall be established and no existing Personal Information Bank shall be substantially modified without approval by the head of the institution or otherwise than in accordance with any term or condition on which their approval is given;
- 2. Development of Personal Information Banks must be in accordance with guidance provided to institutions by the Treasury Board of Canada Secretariat;
- 3. Personal Information Banks must include all information elements outlined in section 11 of the *Privacy Act*, specifically;
 - a. the identification and a description of the bank, the registration number assigned to it by the Treasury Board of Canada Secretariat and a description of the class of individuals to whom personal information contained in the bank relates,
 - b. the name of the government institution that has control of the bank,
 - c. the title and address of the appropriate officer to whom requests relating to personal information contained in the bank should be sent,
 - d. a statement of the purposes for which personal information in the bank was obtained or compiled and a statement of the uses consistent with those purposes for which the information is used or disclosed.
 - e. a statement of the retention and disposal standards applied to personal information in the bank, and
 - f. an indication, where applicable, that the bank was designated as an exempt bank by an order under section 18 and the provision of section 21 or 22 on the basis of which the order was made.
- 4. New Personal Information Banks must be registered by the Treasury Board of Canada Secretariat prior to publication;
 - a. Prior to registration, all new Personal Information Banks must be accompanied by a Privacy Impact Assessment as per the Directive on Privacy Impact Assessment, as amended from time to time, a copy of which must be provided to the Treasury Board of Canada Secretariat and the Office of the Privacy Commissioner.
- 5. The President of the Treasury Board may withdraw this delegation at any time for, but not limited to, the following reasons:
 - a. failure to adhere to any of these conditions or requirements provided by the

Treasury Board of Canada Secretariat; and/or

b. publishing new Personal Information Banks in the absence of a registration number as issued by the Treasury Board of Canada Secretariat.