# ANNUAL REPORT ON THE PRIVACY ACT, 2019-20

#### INTRODUCTION

The *Privacy Act* relates to individuals' right to access and correct personal information the Government of Canada holds about them or the Government's collection, use and disclosure of their personal information in the course of providing services (e.g., old age pensions or employment insurance).

The National Battlefields Commission (NBC) is an institution subject to the *Privacy Act* and, pursuant to section 72 of the *Act*, it is required to submit to Parliament an annual report on the administration of this Act within the institution.

The NBC is an agency of the Government of Canada and is part of the portfolio of the Minister of Canadian Heritage. Created in 1908 under the *Act respecting the National Battlefields at Quebec City*, SC 1908, c 57, the NBC, in accordance with its mandate, is responsible for the administration, management, conservation and promotion of Battlefields Park (located in Quebec City), and manages funds allocated for this purpose.

#### ORGANIZATIONAL STRUCTURE

Requests are sent to the Administration, which looks after personal files and ensures that requests are processed within the legal time frames. All other requests are forwarded to the Acting Secretary-Director General, who processes them within the time frames prescribed by the *Act*.

The NBC has not entered into or been a party to any contract for the provision of services pursuant to article 73.1 of the *Act*.

#### **DELEGATION ORDER**

The President, Acting Secretary-Director General, Director of Institutional Affairs and Director of Administration all hold full authority for the purposes of administering the *Privacy Act*, as per the signed copy of the delegation order attached to this report.

#### PERFORMANCE FOR 2019-2020

As demonstrated in the statistical report, only one application was received during the reporting period. This request was completed within less than 30 days.



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The percentage of requests completed within the fiscal year is 100%.

The table below shows the multi-year trends in the number of privacy requests received and completed:

Period	Number of requests received during the period	Number of requests processed during the period
2019-2020	1	1
2018-2019	0	0
2017-2018	0	0
2016-2017	0	0
2015-2016	0	1

No request for an extension of time was required and no consultations were made for other institutions.

Between the beginning of the pandemic context related to COVID-19 and March 31, 2020, the NBC received no new requests. As a result, no issues were raised with respect to privacy requests.

The form for the statistical report on the *Privacy Act* is attached.

## TRAINING AND AWARENESS

No training activities were provided, but as an awareness tool, the NBC sent its employees a notice regarding government measures for the protection of personal information and the prevention of security breaches during the reporting period.

## POLICIES, GUIDELINES, PROCEDURES AND INITIATIVES

During the period covered by this report, the NBC maintained the application of its directive on the protection of personal information, which consists of the insertion of a privacy notice following the NBC's signature and logo in e-mail exchanges. It also continued to include confidentiality clauses in its agreements.

No new policies, guidelines, procedures or initiatives were implemented during this reporting period.

# SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS OR AUDITS

In the context where the NBC did not receive any complaints, audits or investigations during the reporting period, no specific issues were raised.

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# **MONITORING COMPLIANCE**

Follow-up on processing times is usually done by the Administration on a weekly basis when there are applications in process. Later, the Acting Secretary-Director General is informed of the follow-up given to applications.

For the 2019-2020 reporting period, monitoring was carried out during processing to ensure, among other things, that deadlines were met.

## MATERIAL PRIVACY BREACHES

No material privacy breaches were reported to the Office of the Privacy Commissioner and the Treasury Board of Canada Secretariat in 2019-2020.

## PRIVACY IMPACT ASSESSMENTS

The NBC did not conduct any privacy impact assessment during the reporting period.

## PUBLIC INTEREST DISCLOSURES

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

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