



Canada Infrastructure Bank

2024-2025 Annual Report to Parliament

Access to Information Act



Canada Infrastructure Bank | Banque de l'infrastructure du Canada

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Accessibility

The CIB is committed to creating a barrier-free experience for all employees, job-seekers, clients, suppliers and other stakeholders. For any questions about accessibility or to request any accommodations, please contact your CIB representative or email accessible@cib-bic.ca.

1. Introduction

1.1 Purpose of the Access to Information Act

The purpose of the *Access to Information Act* (the “**Act**”) is to enhance the accountability and transparency of federal institutions in order to promote an open and democratic society and to enable public debate on the conduct of those institutions.

In furtherance of that purpose,

- » Part 1 of the Act extends the present laws of Canada to provide a right of access to information in records under the control of a government institution in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific and that decisions on the disclosure of government information should be reviewed independently of government; and
- » Part 2 of the Act sets out requirements for the proactive publication of information.

The Act is also intended to complement and not replace existing procedures for access to government information and is not intended to limit in any way access to the type of government information that is normally available to the public.

This report is prepared in accordance with subsection 94(1) of the Act and is hereby submitted for tabling in Parliament under subsection 94(2) of the Act. It presents an overview of how the Canada Infrastructure Bank (“**CIB**”) carried out its responsibilities under the Act during the reporting period from April 1, 2024 to March 31, 2025 (the “**Reporting Period**”). Once tabled in Parliament, this report, along with previous such reports, is publicly available within the “Reports & Transparency” section of the CIB’s website: <https://cib-bic.ca/>.

The CIB does not have any non-operational (“paper”) subsidiaries to account for during the Reporting Period and is not required to report on behalf of any non-operational institution.

1.2 Mandate of the Canada Infrastructure Bank

The CIB is a Crown Corporation established pursuant to the *Canada Infrastructure Bank Act* on June 22, 2017. The CIB’s purpose is to invest, and seek to attract investment from private sector investors and institutional investors, in infrastructure projects in Canada or partly in Canada that will generate revenue and that will be in the public interest by, for example,

supporting conditions that foster economic growth or by contributing to the sustainability of infrastructure in Canada.

The CIB develops infrastructure projects in partnership with federal, provincial, territorial, municipal, and Indigenous government sponsors and the private sector. As indicated in the Minister's Statement of Priorities and Accountabilities ("**SPA**"), the CIB makes investments in five priority sectors: Clean Power, Trade and Transportation, Green Infrastructure, Public Transit and Broadband. The CIB invests in Indigenous infrastructure across our five priority sectors with initiatives that are tailored to address unique challenges faced by Indigenous communities. The latest SPA is available on the CIB's website (<https://cib-bic.ca/en/about-us/governance/>).

The CIB also is a centre of expertise, providing advisory services to project sponsors to maximize the potential impact and outcome of infrastructure development. This may involve offering project acceleration funding for initial planning and design stages, where such investment could expedite the project's progress towards becoming investable.

As an impact investor, the CIB is focused on achieving outcomes through its investments to providing clean and reliable electricity to Canadians, increasing economic growth, connecting communities, and building partnerships with Indigenous Peoples to reduce their infrastructure gap and promote economic participation.

2. Organizational Structure

The powers, duties and functions of the administration of the Act have been delegated by the Chief Executive Officer (“**CEO**”) to the General Counsel & Corporate Secretary who also serves as the organization’s ATIP Coordinator.

The General Counsel & Corporate Secretary is an officer of the CIB and reports directly to the CEO. Two employees within the CIB’s Corporate Secretariat, the Assistant Corporate Secretary, and the Corporate Governance Associate provide support to the ATIP Coordinator in managing day-to-day activities under the *Access to Information Act* and the *Privacy Act*. This includes coordinating the processing of ATIP requests, consultations and complaints, and responding to informal requests for information. The equivalent of 0.9 full-time equivalents (FTEs) was applied to access to information matters this Reporting Period. The cost of administering the CIB’s responsibilities under the Act for the Reporting Period is estimated at \$115,000 in salary costs. However, this expenditure does not include the resources required by other areas of the CIB to search for responsive records. No external consulting resources were required during the Reporting Period.

The CIB has adopted the Access to Information Procedure to describe the CIB’s responsibilities and activities in accordance with the provisions of the Act and the regulations, as well as related Treasury Board of Canada Secretariat policies, directives, and guidelines. The ATIP Coordinator’s responsibilities are as follows:

- » receive and process all requests in accordance with the Act;
- » assist applicants in formulating their requests when required;
- » gather all pertinent records and ensure that the search for information is rigorous and complete;
- » conduct the review of pertinent records and apply all discretionary and mandatory exemptions under the Act;
- » assist the Office of the Information Commissioner (OIC) in all access to information related matters including complaints against the CIB;
- » prepare annual reports on the administration of the Act;

- » provide ongoing advice and guidance to employees on matters related to access to information;
- » provide access to information awareness and training sessions to ensure that employees are aware of the obligations imposed by the legislation;
- » respond to consultations received from external organizations;
- » develop and maintain procedures and compliance tools; and
- » participate in ATIP community activities and ATIP community meetings.

In addition to administering the CIB's ATIP activities, the ATIP Coordinator is also responsible for managing the CIB's responses to Parliamentary Returns (Order Paper Questions), as well as orders for the production of papers from Parliamentary committees and information requests from the Parliamentary Budget Officer. During the Reporting Period, the CIB was tasked to respond to 49 Parliamentary Returns (compared to 65 in the previous reporting period). All responses to Parliamentary Returns are reviewed to ensure that they comply with requirements of the Act and the *Privacy Act*. Additionally, the CIB provided information to two information requests received from the Parliamentary Budget Officer during the Reporting Period.

The CIB was not a party to any service agreement described under section 96 of the Act during the Reporting Period.

For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see the section “**Proactive Publication under Part 2 of the Access to Information Act**”, below.

3. Delegation Order

For the purposes of section 3 of the Act, the CEO of the CIB is designated as the “head” of the government institution. In accordance with section 95 of the Act, the CEO’s authority has been delegated to the General Counsel & Corporate Secretary to enable the CIB to meet its legislated requirements.

A copy of the signed Delegation Order dated March 10, 2021, in effect at the end of the Reporting Period is provided in **Annex A**. During the 2025-2026 reporting period, the delegation order will be updated to delegate certain authorities of the Act to other employees in the Corporate Secretariat who support the ATIP Coordinator. These changes will increase capacity and create efficiencies in responding to requests under the Act.

4. Performance under part 1 of the access to information Act, 2024-2025

4.1 Access Requests Received and Source

The CIB received eighteen (18) new formal requests under the Act during the Reporting Period, and one (1) request was carried forward from the previous reporting period. Seventeen (17) requests were submitted and received online through the ATIP Online Request Service and one (1) request was received through the CIB's ATIP email address.

The formal requests received during the Reporting Period fall within the following categories:

- » Public – 11
- » Organization – 3
- » Business (Private Sector) – 1
- » Academia – 1
- » Decline to Identify – 2

Eighteen (18) requests were closed during the Reporting Period. The total number of requests received increased approximately 64% over the previous reporting period, and the CIB processed 2,445 pages (and disclosed 1,983 pages), representing an increase of 45% over the previous reporting period. In the cases where records were provided, electronic copies were provided in all cases to the requester by electronic mail. This level of activity is generally consistent with the CIB's performance over the last five years. The CIB anticipates this level of activity to continue in future years, while the number of pages processed and disclosed may vary from year-to-year depending on the subject matter and scope of the access request.

One request received in late March was active as of the last day of the Reporting Period and was carried over to the next reporting period. This request was subsequently completed within the legislated timelines. As of the last day of the Reporting Period, there were no active complaints.

Table 1: Overview of Access Requests Received and Completed, 2020-2021 to 2024-2025

Reporting Period	Requests Received	Request Outstanding from Previous Reporting Period	Requests Completed	Number of Pages Processed
2024-2025	18	1	18	2,445
2023-2024	11	1	11	1,690
2022-2023	9	2	10	3,785
2021-2022	16	0	14	4,544
2020-2021	16	0	16	824

4.2 Completion Time and Extensions Taken

During the Reporting Period, 67% of the completed requests were processed and closed within the initial 30-day legislated time period.

Six (6) requests required extensions. The reasons for extensions for five (5) requests were pursuant to paragraph 9(1)(c) of the Act (Third-Party Notice) to allow the CIB to communicate with third parties regarding the CIB's intention to disclose a record that the CIB has reason to believe contains information described in subsection 20(1) of the Act. All affected requests under this extension taken were responded to within the extended period communicated to the requester. One (1) request required an extension under paragraph 9(1)(a) due to the large volume of records requested. That request was later abandoned by the requester following engagement from the ATIP Coordinator and disclosure of records made informally.

The table below provides a breakdown of completion times for requests closed during the Reporting Period, as well as a comparison of this performance to prior years.

Table 2: Completion Time for Requests Closed, 2020-2021 to 2024-2025

Reporting Period	0 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days
2024-2025	7	4	3	3	1	0
2023-2024	2	5	1	2	1	0
2022-2023	5	1	1	0	1	2
2021-2022	4	4	2	3	1	0
2020-2021	2	12	2	0	0	0

4.3 Disposition of Requests

The following table summarizes our disclosure dispositions during the Reporting Period compared to prior years.

Table 3: Disposition of Requests Completed, 2020-2021 to 2024-2025

Reporting Period	All disclosed	Disclosed in part	All exempted	No records exist	Request abandoned	TOTAL
2024-2025	4 (22%)	10 (56%)	0	3 (17%)	1 (5%)	18 (100%)
2023-2024	5 (45%)	5 (45%)	1 (10%)	0	0	11 (100%)
2022-2023	5 (50%)	4 (40%)	1 (10%)	0	0	10 (100%)
2021-2022	2 (14%)	7 (50%)	4 (29%)	1 (7%)	0	14 (100%)
2020-2021	2 (12.5%)	11 (69%)	1 (6%)	2 (12.5%)	0	16 (100%)

4.4 Exemptions and Exclusions

The most frequent exemption provisions applied by the CIB during the Reporting Period were sections 19(1) (Personal Information); 20(1)(b) (Third Party Information); 21(1)(b) (Advice, etc.). A record may qualify for more than one exemption.

Table 4: Exemptions Applied (Number of Requests)

Exemption	2024-2025
s. 18 – Economic interests of Canada	4
s. 19 – Personal information	10
s. 20 – Third party information	6
s. 21 – Operations of government (Advice, etc.)	5
s. 23 – Protected information – solicitors, advocates and notaries	1
s. 24 – Statutory prohibitions against disclosure	2

The Access to Information Act does not apply to information that is publicly available, such as government publications (section 68) and Confidences of the King's Privy Council for Canada (section 69). During the Reporting Period, the CIB did not exclude records based on section 68 and section 69.

4.5 Consultations

A core aspect of the CIB’s mandate and activities is to work with governments across Canada at all levels to address their infrastructure priorities and develop opportunities for the public sector to partner with private and institutional investors. As a result, the CIB regularly receives access to information consultation requests from other government institutions that are processing files with records originating from or concerning the CIB’s activities. The other government institution will consult with the CIB to seek the CIB’s recommendations with respect to the treatment of these records in order to facilitate the completion of the request. During the Reporting Period, the CIB received nine (9) consultations from other government institutions, representing a decrease of 50% from the number of consultations received during

the prior reporting period. The consultations originated from the following government institutions: three (3) from Housing, Infrastructure and Communities Canada (HICC), three (3) from Natural Resources Canada (NRCan), two (2) from the Department of Finance Canada, and one (1) from Innovation, Science and Economic Development Canada (ISED).

Table 5: Overview of Consultations Received and Completed, 2020-2021 to 2024-2025

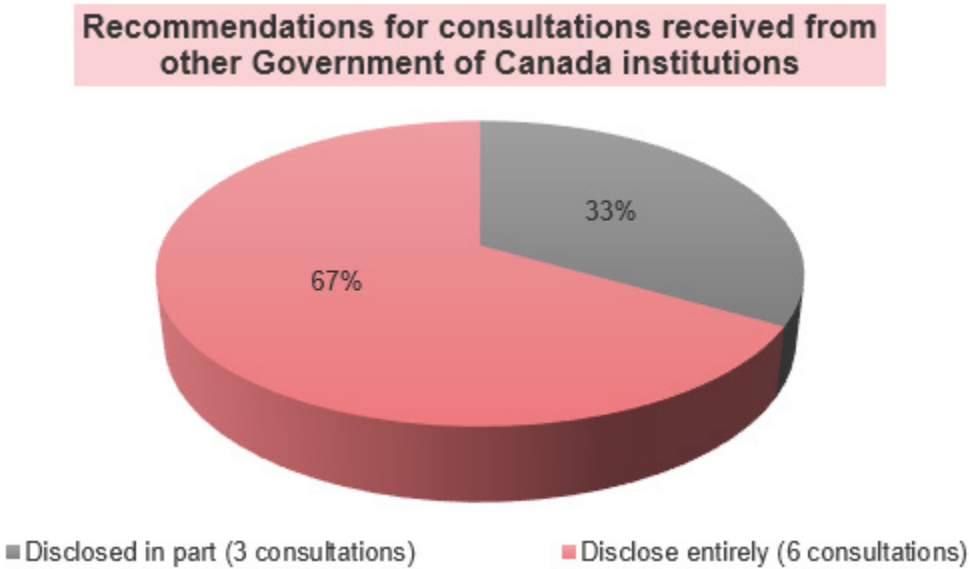
Reporting Period	Consultations Received	Consultations Remained Outstanding from Previous Reporting Period	Consultations Completed	Number of Pages Reviewed
2024-2025	9	0	9	139
2023-2024	18	0	18	649
2022-2023	30	0	30	2,797
2021-2022	26	0	26	2,661
2020-2021	11	0	11	649

All of the consultation requests received during the Reporting Period were responded to within the response timeline provided by the consulting institution. The table below provides a breakdown of completion times for requests closed during the Reporting Period, as well as a comparison to prior years.

Table 6: Completion Time for Consultations Received, 2020-2021 to 2024-2025

Reporting Period	0 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days
2024-2025	9	0	0	0
2023-2024	17	1	0	0
2022-2023	28	2	0	0
2021-2022	23	1	1	1
2020-2021	10	0	1	0

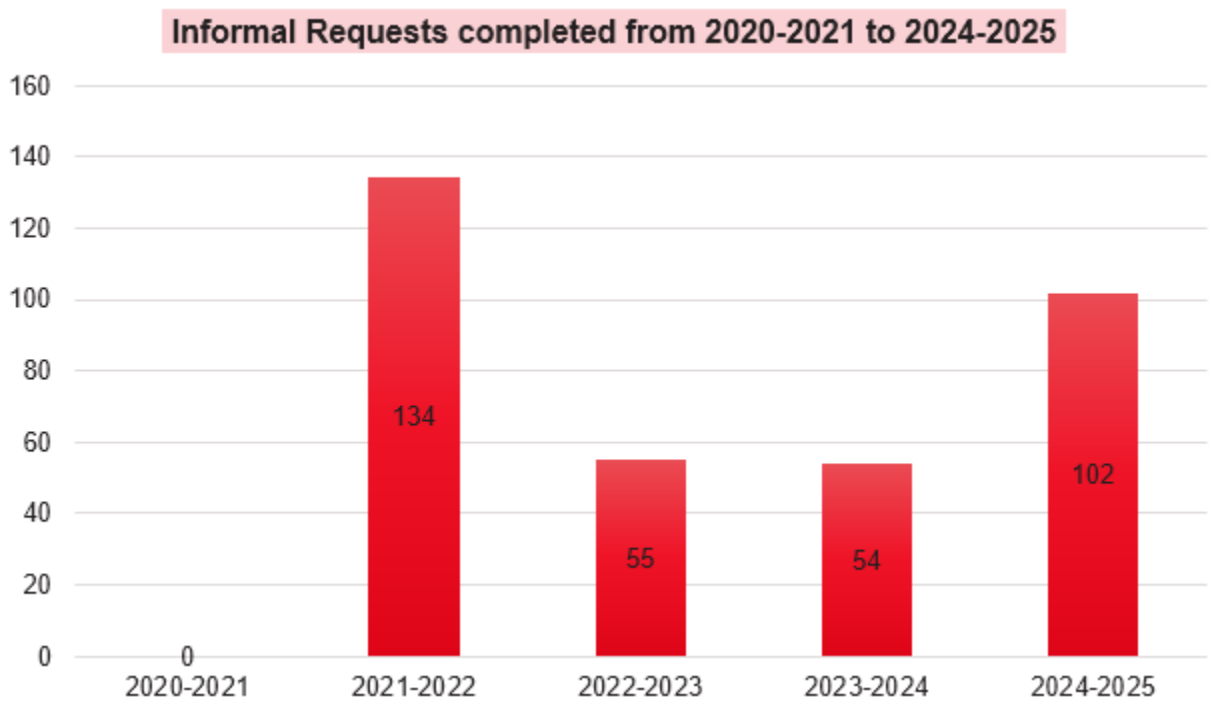
The graph below shows the recommendations for consultations received during the Reporting Period.



4.6 Informal Requests

In addition to the formal requests for information, the CIB received, processed and completed 102 informal requests under the Act during the Reporting Period. All informal requests were for copies of records previously processed under the Act. These requests were submitted and received online through the Treasury Board of Canada Secretariat's Open Government Portal. All informal requests were completed within fifteen (15) days.

Table 4: Exemptions Applied (Number of Requests)



5. Training and Awareness

During the Reporting Period, the ATIP Coordinator continued to promote awareness of the CIB's obligations under the Act through a variety of training approaches.

- » **Compliance with the Access to Information Act and the Privacy Act (Roles and Responsibilities):** The purpose of this session is to provide new employees who have joined the CIB with an overview of the CIB's legal responsibilities under the *Access to Information Act* and the *Privacy Act*. Topics covered include: timelines to respond to requests; the duty to assist; exemptions and exclusions; steps in processing a request; duties of the ATIP Coordinator and CIB employees in processing requests; and offences for obstructing the right of access or an investigation by the Information Commissioner or the Privacy Commissioner. During the Reporting Period, one (1) employee awareness session was held, and 17 employees participated in the awareness session.
- » **Code of Conduct for Personnel:** During the Reporting Period, updates to the Code of Conduct for Personnel were approved by the Board of Directors and communicated to employees. The Code of Conduct is publicly available on the CIB's website and includes specific guidance and expectations regarding the CIB's responsibilities under the *Access to Information Act* and the *Privacy Act*. An information session on the changes to the Code of Conduct was held during the All-Staff Town Hall in January 2025. All employees completed their annual attestation of compliance with the Code of Conduct in March 2025. Regular mandatory awareness sessions on the updated version of the Code of Conduct, which includes interactive case studies designed to help employees understand the application of the *Access to Information Act* and the *Privacy Act* to day-to-day activities, will resume for the 2025-2026 reporting period.

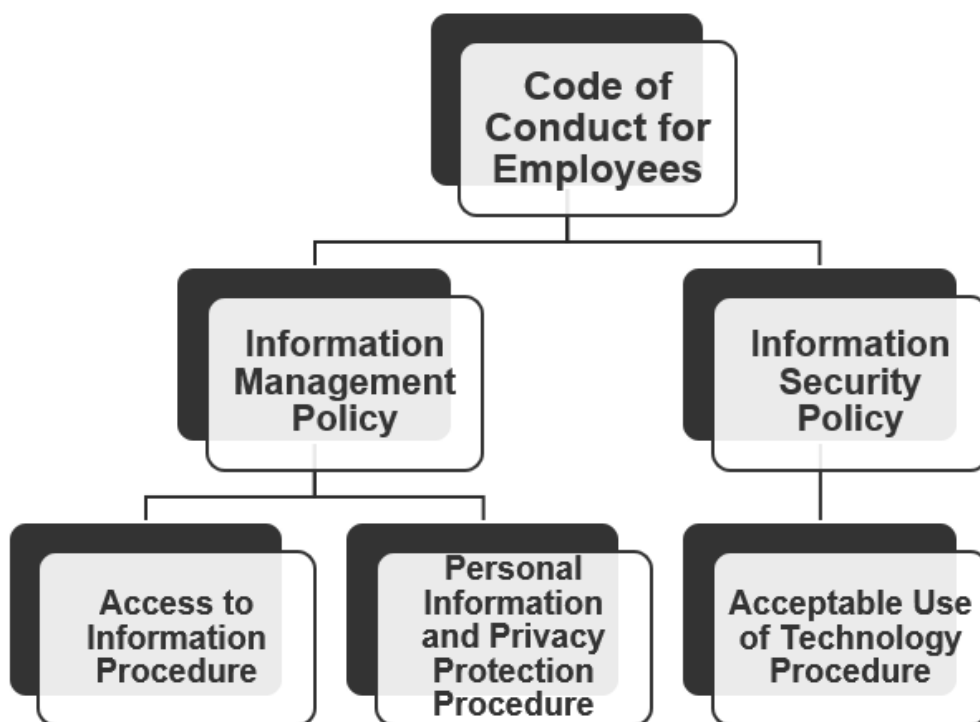
In addition, the ATIP Coordinator is also able to offer one-on-one or small group training and guidance in both official languages as the need arises. The ATIP Coordinator and employees in the Corporate Secretariat also attended quarterly community meetings hosted by the Treasury Board of Canada Secretariat, as well as other information sessions such as the deep dive series on specific sections of the *Access to Information Act* and *Privacy Act*.

The ATIP Coordinator also annually reports on the administration of the Act to the Human Resources and Governance Committee of the CIB's Board of Directors.

6. Policies, Guidelines and Procedures

6.1 Institution-Specific Policies and Procedures

The CIB did not adopt any new or revised institution-specific policies, guidelines and procedures related to access to information during the Reporting Period. Institution-specific policies and procedures that incorporate the CIB's requirements under the *Access to Information Act* and the *Privacy Act* are implemented within the policies and procedures listed below.



The CIB regularly reviews its internal policies and procedures to ensure they remain up-to-date and aligned with the Treasury Board of Canada Secretariat's Access to Information and Privacy Policy instruments.

The CIB's chapter in Info Source: Sources of Federal Government and Employee Information is posted within the "Reports & Transparency" section of the CIB's website. Info Source provides individuals and employees of the government (current and former) with relevant information to access personal information about themselves held by government institutions subject to the *Access to Information Act* and the *Privacy Act* and to exercise their rights under the *Privacy Act*.

6.2 Proactive Publication under Part 2 of the Access to Information Act

As the CIB is a “government institution”, including for the purposes of Part 2 of the Act, the CIB is subject to the proactive publication requirements for travel and hospitality expenses (sections 82 and 83), as well as reports tabled in Parliament (section 84).

Travel and Hospitality Expenses

The CIB provides disclosure on its website of travel and hospitality expenses of members of the board of directors, the CEO and senior officers (i.e., members of the CIB’s executive committee). The CIB discloses business expenses related to travel and hospitality for the following activities: board of director related meetings; stakeholder outreach; meetings with the shareholder (government); conferences; and operational activities. The CEO (as the “head” of the government institution) has delegated to the Finance team the responsibility to prepare the reports for travel and hospitality expenses in accordance with the processes and templates approved by the Chief Financial Officer for disclosure on the CIB’s website. The draft disclosure is prepared by a member of the corporate accounting team and reviewed by the Chief Financial Officer to confirm the completeness and accuracy of the information presented. Information that would normally be withheld under the Act or the *Privacy Act* is withheld from the reports for travel and hospitality expenses. Reports approved are published on the CIB’s website and provided to the Corporate Governance Associate for publication on the Open Government Portal, pursuant to the Directive on Proactive Publication under the *Access to Information Act*.

Reports Tabled in Parliament

The reports tabled in Parliament on behalf of the CIB include the annual reports on the administration of the *Access to Information Act* and the *Privacy Act*, as well as the corporate plan summary and the annual report (including the auditor’s report) of the corporation filed pursuant to the *Financial Administration Act*. Publications on the CIB’s website of reports tabled in Parliament are handled by the Communications and Public Affairs team. Once the tabling of the report in Parliament has been confirmed, the Director, Corporate Communications proceeds with publication on the CIB website.

Information about how the CIB met the proactive publication requirements under Part 2 of the Act is provided in section 9 of this report.

7. Initiatives and projects to improve access to information

During the Reporting Period, the CIB advanced two important initiatives to improve operational efficiency and compliance with legislation, as well as increase the transparency of the CIB's operations, investments and decision-making processes.

7.1 Information Management

During the Reporting Period, the CIB progressed its data governance project. The data governance project aims to enhance the quality and security of the CIB's information and improve collaboration and effective decision-making. The project involves cross-functional collaboration among departments, policy development and technology implementation. Key milestones completed during the Reporting Period include:

- » Data Classification and Retention: The project team completed data classification and application of metadata for 10 or 12 departments to support improved information management practices. The project team also implemented the retention schedule for the data classified in accordance with disposition authorization from Library and Archives Canada to ensure the retention and protection of records of historical or archival value.
- » Engagement with Stakeholders: The project team engaged with stakeholders from the Strategy, Communications and Investment groups to complete an analysis of data usage and define information classification structure, information ownership responsibilities, and accountability.
- » Privacy and Security Measures: Enhanced data protection measures, including implementing encryption, access controls, and retention policies to improve the protection of personal information and sensitive information.

The remaining phases of the data governance project, including employee training on their role in maintaining data integrity, will be completed during the 2025-2026 reporting period.

7.2 Transparency Framework and Policy

During the Reporting Period, the CIB developed a Transparency Framework and Policy, which was approved by the Human Resource and Governance Committee of the Board of Directors. This policy affirms the CIB's commitment openness and transparency, and outlines the core principles guiding the CIB's approach to the proactive disclosure of information, including the scope and type of information routinely disclosed and commitments regarding accessibility and official languages. The Transparency Framework and Policy is publicly available within the "Reports & Transparency" section of the CIB's website: <https://cib-bic.ca/>.

The CIB's approach towards to transparency is informed by practices adopted by other financial institutions in the public sector and seeks to respect the confidentiality of commercially sensitive information obtained from proponents of, or private sector investors or institutional investors in, infrastructure projects, as required under the Canada *Infrastructure Bank Act*. In accordance with the Transparency Framework and Policy, the CIB provides proactive disclosure of its governance practices and decision-making processes, including publishing policies related to governance, investment decision-making, procurement and ethics. The CIB also provides detailed disclosures of its investment activities, corporate performance, results and executive compensation in its Annual Report. The CIB expects to complete the implementation of the commitments of the Transparency Framework and Policy during the upcoming reporting period. An internal working group has been established to review the information on investments posted on the CIB website and standardize the disclosures regarding the terms of the CIB's investment, project costs, private capital attracted, and estimated public impact outcomes. Updates to the CIB website will be made available throughout the upcoming reporting period.

8. Summary of key issues and actions taken on complaints

The CIB did not receive any new complaints during the Reporting Period. During the 2023-24 reporting period, the CIB received notice from the Office of the Information Commissioner (“**OIC**”) regarding a complaint alleging that the CIB did not conduct a reasonable search for records in response to the request and improperly withheld information under sections 19 and 21 of the Act. During the Reporting Period, the CIB worked with the OIC and provided a supplemental release package to the requester in an effort to resolve the complaint informally. Following the supplemental release package, the Information Commissioner issued a final report with regard to the investigation. The key findings from the final report are as follows:

- » The CIB was justified in withholding personal information under subsection 19(1) of the Act as it met the requirements of this exemption;
- » The CIB conducted a reasonable search for records, demonstrating that it took reasonable steps to identify and locate responsive records; and
- » The complaint was well-founded with regards to the remaining information that was initially withheld, but a formal order was not necessary given that the CIB voluntarily disclosed this information through the supplemental release package.

There are no other outstanding complaints, audits, or investigations related to access to information from this Reporting Period or previous periods.

9. Proactive publication under part 2 of the Access to Information Act

The CIB is a parent Crown corporation named in Part I of Schedule III to the *Financial Administration Act* and is a government institution as defined in section 3 of the *Access to Information Act*. As a government institution, the CIB is subject to the proactive disclosure requirements outlined in section 82 (Travel Expenses), section 83 (Hospitality) and section 84 (Reports tabled in Parliament) of the *Access to Information Act*.

The Corporate Governance Associate, who reports to the ATIP Coordinator, is responsible for publishing on the Open Government Portal, pursuant to the Directive on Proactive Publication under the *Access to Information Act*, the summary list of completed access to information requests and reports of travel and hospitality expenses that have received the approval from the CFO for publication. The ATIP Coordinator also works in collaboration with the Communications and Public Affairs team to publish on the CIB's website (Reports & Transparency) all reports tabled in Parliament under an Act of Parliament. During the Reporting Period, the CIB was compliant in all aspects (100%) of the proactive publication requirements, as outlined in the table below.

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published**
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Apply to all Government Institutions as defined in section 3 of the Access to Information Act

Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Y	Finance department: Corporate Accountant and CFO Corporate Governance Associate	100%	https://search.open.canada.ca/travel/ https://cib-bic.ca/en/regulatory-reports/
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Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or position(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published**
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Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Finance department: Corporate Accountant and CFO Corporate Governance Associate	100%	https://open.canada.ca/en/search/hospitalityq https://cib-bic.ca/en/regulatory-reports/
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Reports tabled in Parliament	84	Within 30 days after tabling	Y	Communications and Public Affairs	100%	https://cib-bic.ca/en/regulatory-reports/
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Apply to government entities or Departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the Financial Administration Act

Contracts over \$10,000	86	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	N	N/A	N/A	N/A
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Grants & Contributions over \$25,000	87	Within 30 days after the quarter	N	N/A	N/A	N/A
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Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	N	N/A	N/A	N/A
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Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that is received by their office	88(b)	Within 30 days after the end of the month received	N	N/A	N/A	N/A
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Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published**
Packages of briefing materials prepared for a deputy head or equivalent's appearance before a committee of Parliament	88(c)	Within 120 days after appearance	N	N/A	N/A	N/A

Applies to government institutions that are departments named in Schedule I to the Financial Administration Act or portions of the core public administration named in Schedule IV to that Act (i.e. government institutions for which Treasury Board is the employer)

Reclassification of positions	85	Within 30 days after the quarter	N	N/A	N/A	N/A
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Apply to Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office)

Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	N	N/A	N/A	N/A
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Titles and reference numbers of memoranda prepared by a government institution for the minister, that is received by their office	74(b)	Within 30 days after the end of the month received	N	N/A	N/A	N/A
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Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published**
Package of question period notes prepared by a government institution for the minister and in use on the last sitting day of the House of Commons in June and December	74(c)	Within 30 days after last sitting day of the House of Commons in June and December	N	N/A	N/A	N/A
Packages of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament	74(d)	Within 120 days after appearance	N	N/A	N/A	N/A
Travel Expenses	75	Within 30 days after the end of the month of reimbursement	N	N/A	N/A	N/A
Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	N	N/A	N/A	N/A
Contracts over \$10,000	77	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	N	N/A	N/A	N/A

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published**
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Ministers' Offices Expenses
Note: This consolidated report is currently published by TBS on behalf of all institutions.

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Within 120 days after the fiscal year

N

N/A

N/A

N/A

**When counting proactive publication requirements count monthly or quarterly reports as a single publication.*

***i.e., specific page where that information is located on open.canada.ca or the institution's website*

10. Monitoring Compliance

The following practices describe the CIB's approach to monitoring compliance with the Act during the Reporting Period:

- » The CIB has not implemented time-tracking software to monitor compliance and track costs incurred by the CIB related to the administration of the Act. Due to the limited and manageable number of files processed by the CIB, a formal monitoring procedure to oversee the time taken to process access to information requests has not been established. As discussed in section 2 of this report, two employees provide support to the ATIP Coordinator in processing requests and managing the CIB's day-to-day activities under the *Access to Information Act* and the *Privacy Act*. The ATIP Coordinator signs all outgoing correspondence regarding the ongoing processing of the files and therefore is aware of the status of the files. The ATIP Coordinator also prepares quarterly reports for the CEO and the Finance and Audit Committee of the Board of Directors. These reports include a list of files closed during the past quarter, number of active files as of the last day of the quarter, and a brief description of the status and/or response for each file, including the time taken to process access to information requests.
- » Standard CIB template agreements and contracts (including non-disclosure agreements, consulting services agreements and memoranda of understanding) include representations regarding the CIB's responsibilities under the Act and acknowledgment of the counterparty's obligations to assist the CIB in discharging its responsibilities under the Act. The following provision is generally included in CIB's non-disclosure agreements with third parties:
- » *Notwithstanding any term in this Agreement, the Counterparty acknowledges that the CIB is subject to the Access to Information Act, R.S.C. 1985, c. A-1, the Privacy Act, R.S.C. 1985, c. P-21, the Financial Administration Act, R.S.C. 1985, c. F-11, and the Canada Infrastructure Bank Act, S.C. 2017, c. 20, s. 403 (collectively, the "Federal Acts"), as amended from time to time, and that Confidential Information provided to or from the CIB in connection with this Agreement may be subject to the provisions of the Federal Acts. The Counterparty will comply, and will require its Representatives to comply, with all applicable Federal Acts that may relate to this Agreement and Confidential Information.*

Additionally, the following provision is generally included in CIB's agreements for consulting services with third parties:

The Consultant acknowledges that the CIB is subject to the Access to Information Act, R.S.C. 1985, c. A-1, the Privacy Act, R.S.C. 1985, c. P-21, the Financial Administration Act, R.S.C. 1985, c. F-11, and the Canada Infrastructure Bank Act, S.C. 2017, c. 20, s. 403 (collectively, the "Federal Acts") and that information provided to or from the CIB in connection with this Agreement may be subject to the provisions of the Federal Acts. If a request is made under any of the Federal Acts, the Consultant will cooperate with the CIB and make reasonable efforts to assist the CIB in complying with its duties and obligations as set out in and which arise from the Federal Acts as it may relate to this Agreement. Nothing in this Agreement shall prohibit the CIB's disclosure, following the signing of the Agreement, of the following information: the name of the Consultant, the amount of the total remuneration paid and payable by CIB to the Consultant under the Agreement, and a general description of the Services performed.

- » The accuracy and completeness of travel and hospitality expenses proactively published under Part 2 of the Act is monitored by the Finance team and approved in a centralized expense system that populates a general ledger from which relevant expenses are extracted for publication. To monitor accuracy, each claim is reviewed through the expense system and cross-referenced with supporting documentation. Monthly disclosure reports are reviewed and approved by the Chief Financial Officer before being submitted to the Corporate Secretariat for publication on the CIB's website and the Open Government Portal.

Appendix A – Delegation Order

DELEGATION OF AUTHORITY

ACCESS TO INFORMATION ACT PRIVACY ACT

I, the undersigned, Chief Executive Officer of the Canada Infrastructure Bank, pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby

- i) designates the General Counsel & Corporate Secretary as the CIB's Access to Information and Privacy Coordinator; and
- ii) delegates to the persons of the Canada Infrastructure Bank holding the positions set out below, or the persons occupying on an acting basis those positions, the authority to exercise the powers, duties and functions of the Chief Executive Officer as the head of the Canada Infrastructure Bank, under the provisions of the *Access to Information Act* and *Privacy Act* and their related regulations.

This designation replaces all previous delegation orders.

Signed at the City of Toronto, this 10th day of March, 2021.



Ehren Cory

Chief Executive Officer / Président-directeur général

DÉLÉGATION DE POUVOIRS

LOI SUR L'ACCÈS À L'INFORMATION LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

Je, soussigné, Président-directeur général de la Banque de l'Infrastructure du Canada, conformément à l'article 95 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*,

- i) désigne l'Avocat général et secrétaire de la Banque de l'Infrastructure du Canada à titre de Coordonnateur de l'accès à l'information et de la protection des renseignements personnels; et
- ii) délègue par la présente aux titulaires de postes indiqués ci-après, ou aux personnes occupant ces postes par intérim, les pouvoirs et fonctions dont il est investi en tant que Président-directeur général et responsable de la Banque de l'Infrastructure du Canada aux termes de la *Loi sur l'accès à l'information*, de la *Loi sur la protection des renseignements personnels* et des réglementations afférentes.

Le présent document remplace et annule tout arrêté de délégation antérieur.

Signé à la ville de Toronto, le 10e jour de mars, 2021

APPENDIX / ANNEXE

Delegation of powers, duties and functions under section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*

Délégation de pouvoirs en vertu de l'article 95 de la *Loi sur l'accès à l'information* et l'article 73 de la *Loi sur la protection des renseignements personnels*

Position / Poste	<i>Access to Information Act</i> and Regulations / <i>Loi sur l'accès à l'information</i> et réglementation afférente	<i>Privacy Act</i> and Regulations / <i>Loi sur la protection des renseignements personnels</i> et réglementation afférente
Chief Financial Officer & Chief Administrative Officer / Directrice principale et chef des directions financière et administrative	Full authority / Autorité absolue	Full authority / Autorité absolue
General Counsel & Corporate Secretary / Avocat général et secrétaire de la Société	Full authority / Autorité absolue	Full authority / Autorité absolue



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