



Canada Infrastructure Bank

2024-2025 Annual Report to Parliament

Privacy 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 *Privacy Act*

The purpose of the *Privacy Act* (“**Act**”) is to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information.

This report is prepared in accordance with subsection 72(1) of the Act and is hereby submitted for tabling in Parliament under subsection 72(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 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 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 SPA is available on the CIB’s Web site (<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 CIB has adopted the Privacy Protection Procedure to implement the CIB’s obligations under the *Privacy Act*, including the general principles and practices followed in processing requests for personal information. The ATIP Coordinator’s responsibilities regarding the *Privacy Act* are as follows:

- » processing requests for personal information and the resolution of complaints pursuant to the Act and exercising discretion under the Act in a fair, reasonable and impartial manner with respect to decisions associated with such processing;
- » preparing the annual report on the administration of the Act that is tabled in each House of Parliament;
- » preparing the statistical report on the administration of the Act within the CIB;
- » preparing new or modified Personal Information Bank descriptions;
- » updating the CIB’s chapter in Info Source: Sources of Federal Government and Employee Information, including proposed new or modified Personal Information Banks;
- » providing training, ongoing advice and guidance to senior management and staff on matters related to privacy;
- » regularly reviewing the effectiveness of the CIB’s privacy procedures and, where required, initiating actions to correct any deficiencies;

- » staying current on, and promulgate within the CIB, any changes to administrative requirements for the Act from the Treasury Board of Canada Secretariat, or guidance prepared by the Office of the Privacy Commissioner; and
- » participating in ATIP community activities and ATIP community meetings.

The CIB was not a party to any new or pre-existing service agreement pursuant to section 73.1 of the Act during the Reporting Period.

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 73 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 for 2024-2025

4.1 Requests Received

The CIB received one (1) new formal request for personal information under the Act during the Reporting Period. This request was submitted and received online through the ATIP Online Request Service and was completed within the 30-day legislative timeline and no extension of time limits was required. The disposition of the formal request was “no records exist”.

The CIB did not receive any informal requests for personal information during the Reporting Period. As of the last day of the Reporting Period, there were no active requests for personal information.

This level of activity is generally consistent with the CIB’s performance over the last five years. Since its establishment in June 2017, the CIB has received a very small number of formal requests for personal information under the Act. The only other year of activity was the 2023-2024 reporting period where the CIB received three (3) formal requests for personal information, which were also responded to within legislated timelines.

The tables below describe the CIB’s performance over the last five reporting periods.

Table 1: Overview of Personal Information Requests Received and Completed from 2020-2021 to 2024-2025

Reporting Period	Personal Information Requests Received	Percentage Completed Within Legislated Timelines	Requests Completed Within 0-15 days	Requests Completed Within 16-30 days
2024-2025	1	100%	1	N/A
2023-2024	3	100%	1	2
2022-2023	0	N/A	N/A	N/A
2021-2022	0	N/A	N/A	N/A
2020-2021	0	N/A	N/A	N/A

Table 2: Disposition of Personal Information Requests Closed in 2023-2024 and 2024-2025

Reporting Period	Personal Information Requests Received	Percentage “All disclosed”	Percentage “Disclosed in part”	Percentage “No records exist”
2024-2025	1	N/A	N/A	1 (100%)
2023-2024	3	N/A	2 (67%)	1 (33%)

4.2 Consultations and Active Complaints

During the Reporting Period, no requests for consultations from other government institutions were received and there were no active complaints.

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 sessions was held, and 17 employees participated in the awareness sessions.
- » **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. For example, during the Reporting Period, a specific deep dive awareness session was held with the CIB's human resources team to review the CIB's responsibilities under the *Privacy Act* and discuss best practices of government institutions in protecting and managing personal information. The ATIP

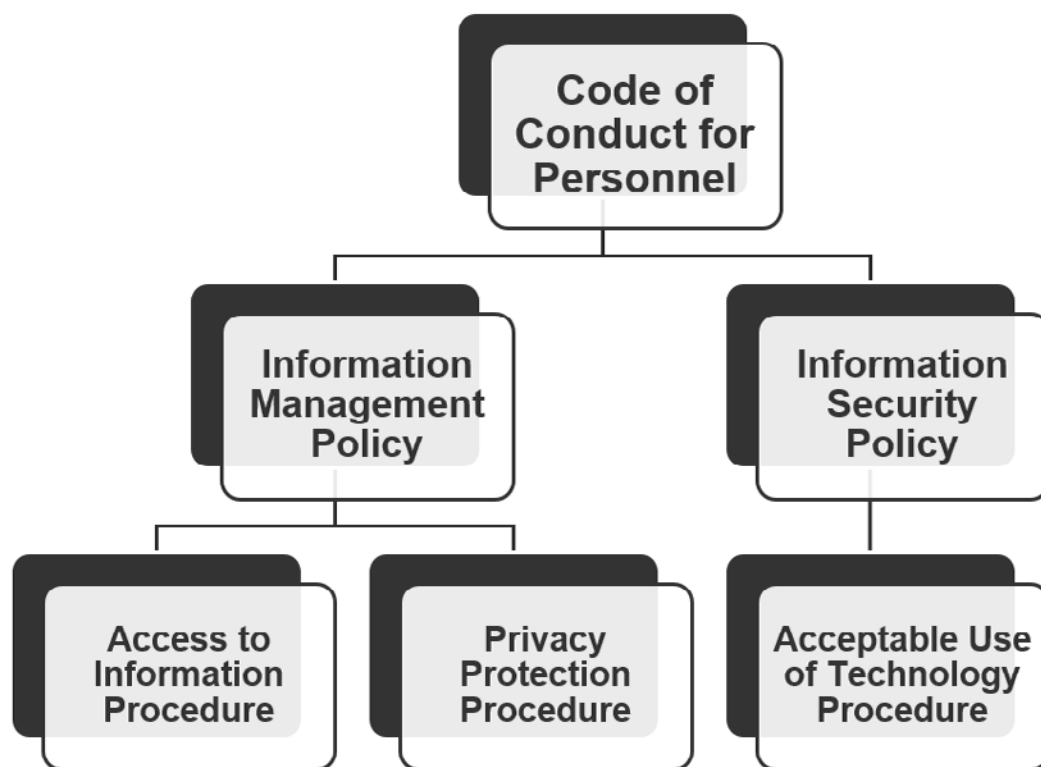
Coordinator and employees in the Corporate Secretariat also attended quarterly community meetings hosted by the Treasury Board of Canada Secretariat, as well as other information sessions such as the deep dive series on specific sections of the *Access to Information Act* and *Privacy Act*.

The ATIP Coordinator also annually reports on the administration of the *Access to Information Act* and *Privacy 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. A review of the CIB's Privacy Protection Procedure will be completed during the 2025-2026 reporting period to confirm continued alignment with the Directive on Privacy Practices, which came into effect on October 9, 2024.

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 Web site. 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*.

The CIB did not have any new collection(s) or new consistent use(s) of Social Insurance Numbers that began during the reporting period.

7. Initiatives and projects to improve privacy

During the Reporting Period, the CIB advanced two important initiatives to improve operational efficiency and compliance with privacy legislation.

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.

8. Summary of key issues and actions taken on complaints

The CIB did not receive any privacy complaints under the *Privacy Act*, nor were any privacy audits or investigations conducted against the CIB during the Reporting Period.

9. Material privacy breaches

In accordance with the Guidelines for Privacy Breaches issued by the Treasury Board of Canada Secretariat, a privacy breach is deemed “material” if the breach involves sensitive personal information and could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals.

During the Reporting Period, there were no material privacy breaches that occurred and were reported to the Office of the Privacy Commissioner and to the Treasury Board of Canada Secretariat (Privacy and Responsible Data Division).

10. Privacy impact assessments

A privacy impact assessment (“**PIA**”) is a formal tool used to identify and mitigate privacy risks for new or modified programs, services or initiatives in an effort to heighten compliance with the Act. PIAs provides a framework to ensure that the protection of personal information is considered throughout the design or re-design of a program or service and they assist decision-makers to avoid or mitigate privacy risks.

The CIB did not initiate any formal PIAs for any new or modified programs, as defined in the Directive on Privacy Practices (*Appendix C; Standard on Privacy Impact Assessment*), and no PIAs were submitted to the Treasury Board of Canada Secretariat and the Office of the Privacy Commissioner during the Reporting Period. The ATIP Coordinator provides advice to the other corporate areas within the CIB concerning the appropriate management of personal information and privacy risks with respect to the conduct of their programs and activities.

11. Public interest disclosures

Paragraph 8(2)(m) allows for disclosure of personal information where the public interest clearly outweighs any invasion of privacy that could result from the disclosure of the information or where disclosure clearly benefit the individual to whom the information relates. There was no disclosure of personal information made pursuant to paragraph 8(2)(m) during the Reporting Period.

12. Monitoring compliance

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

- » 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 personal 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 provisions are generally included in CIB's agreements with third parties for consulting services:

Personal Information. *The Consultant acknowledges and agrees that the CIB has informed the Consultant that the CIB is the custodian of personal information which the CIB is required by law to protect. In light of that disclosure, the Consultant acknowledges and agrees to execute and abide by the terms of the Privacy Undertaking [attached as an appendix to the agreement].*

Federal Acts. *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 CIB is not subject to any exception granted by the Treasury Board of Canada Secretariat to a requirement in the Privacy policy suite.

Annex A: Delegation order

DELEGATION OF AUTHORITY

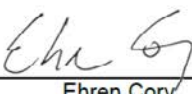
ACCESS TO INFORMATION ACT PRIVACY ACT

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 10^e 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

