

Privacy Act

**Canadian Centre for Occupational Health and Safety
Annual Report to Parliament
April 1, 2020 – March 31, 2021**

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1.0 Introduction

The Canadian Centre for Occupational Health and Safety (CCOHS) is pleased to present to Parliament its annual report on the administration of the *Privacy Act* for the fiscal year commencing April 1, 2020, ending March 31, 2021.

1.1 About the *Privacy Act*

The purpose of the Act is to protect the privacy of individuals with respect to personal information about them held by a government institution and to provide individuals with a right of access to that information and the right to request the correction of that information. This report is prepared in accordance with Section 72 of the *Privacy Act*.

Section 72 of the Act requires that the head of every federal government institution submit an annual report to Parliament on the administration of the Act during the fiscal year. This report outlines CCOHS' accomplishments in carrying out its privacy responsibilities and obligations during the 2020–2021 reporting period.

1.2 About the Canadian Centre for Occupational Health and Safety

The Canadian Centre for Occupational Health and Safety is a departmental corporation under Schedule II of the *Financial Administration Act*, created by Parliament in April 1978 to promote the right of workers in Canada to a healthy and safe working environment. CCOHS is governed by a tripartite council with representatives of employers, workers and governments (federal, provincial and territorial) and is accountable to Parliament through the Minister of Labour. CCOHS is subject to the *Access to Information Act* and *Privacy Act* (ATIP).

CCOHS' mandate is to serve workers in Canada and the world with credible and relevant tools and resources to improve workplace health and safety programs. We believe that all workers in Canada have a fundamental right to a healthy and safe working environment. Through our programs, services, knowledge, commitment, and action, CCOHS will continue its efforts to advance health and safety in the workplace.

CCOHS is Canada's national occupational health and safety resource which is dedicated to the advancement of occupational health and safety performance by providing necessary services including information and knowledge transfer; training and education; cost-effective tools for improving occupational health and safety performance; management systems services supporting health and safety programs; injury and illness prevention initiatives and promoting the total well-being – physical, psychosocial and mental health - of working people. The Centre was created to provide a common focus for and coordination of information in the area of occupational health and safety.

To do this, CCOHS organizes its programs and services to achieve the following strategic outcome:

Improved workplace conditions and practices that enhance the health, safety and well-being of workers in Canada.

2.0 Privacy Management at CCOHS

CCOHS' Vice President, Finance and Chief Financial Officer, who is also the ATIP Coordinator, has been delegated by the President and Chief Executive Officer to exercise authority for all sections of the ATIP Acts with the exception of 8(2)(e) of the *Privacy Act*.

The Vice President, Finance and Chief Financial Officer is accountable for the development, coordination and implementation of effective policies, guidelines, systems and procedures to ensure the President and Chief Executive Officer's responsibilities under the Act are met and to enable appropriate processing and proper disclosure of information. The Coordinator is also responsible for related policies, systems and procedures emanating from the Act.

As CCOHS is a small department with very few requests minimal time is spent administering the Act. Support is also provided by the Financial Administrative Officer.

The activities of CCOHS for Privacy are:

- processing requests under the Act through manual data retrieval processes;
- representing CCOHS in dealings with the Treasury Board of Canada Secretariat, the Information Commissioner and other government departments and agencies regarding the application of the Act as it relates to CCOHS;
- responding to consultations submitted by other federal institutions on CCOHS documents under consideration for release;
- preparing statistical and annual reports to Parliament and other statutory reporting requirements, as well as other material that may be required by central agencies;
- developing and maintaining policies, procedures and guidelines to ensure the Act is respected by departmental staff;
- promoting awareness of the Act within the Department to ensure responsiveness to the obligations imposed on the government; and
- monitoring departmental compliance with the Act, regulations and relevant procedures and policies.

Under Section 73 of the *Privacy Act*, institutions within the same ministerial portfolio can work together to process requests. CCOHS was not party to any service agreements with other government department related to access to information during the reporting period.

Additional copies of this report may be obtained from:

Access to Information and Privacy Coordinator
Canadian Centre for Occupational Health and Safety
135 Hunter Street East
Hamilton, Ontario L8N 1M5

3.0 Access to Information Delegation Order

Section 73 of the *Privacy Act* empowers the head of the institution to delegate any of the powers, duties or functions assigned to them to employees of the institution.

A signed and dated copy of the Delegation Order can be found in Annex A.

4.0 Summary of Key Data

The Statistical Report on the *Privacy Act* for 2020-2021 can be found in Annex B.

4.1 Requests Received and Completed Under the *Privacy Act*

During the 2020-2021 reporting period, CCOHS received one new request pursuant to the *Privacy Act*. The department's ability to respond to this request within the timelines mandated by the *Privacy Act* was affected by the exceptional measures put in place to curb the spread of the novel coronavirus (COVID-19) and to protect the health and safety CCOHS employees and more broadly, of Canadians. CCOHS continues to make reasonable efforts to respond to this request, in accordance with operational realities, and have notified the requester of a processing delay. No mitigation measures were implemented.

As demonstrated in the chart below, the volume of requests received this fiscal year is consistent with those of previous years.

PRIVACY REQUESTS	2020-2021	2019-2020	2018-2019	2017-2018	2016-2017
REQUESTS RECEIVED	1	0	0	0	2
REQUESTS COMPLETED	0	0	0	0	2
REQUESTS CLOSED WITHIN LEGISLATED TIMELINES	-	-	-	-	100%

4.2 Exemptions and Exclusions

Canadians have a right of access to their personal information, but the *Privacy Act* identifies specific exemptions for which the need for confidentiality of certain information is recognized. An exemption is a provision under the Act that authorizes the head of the government institution to not disclose personal information in response to a privacy request. No exemptions were invoked during this reporting period.

5.0 Training and Awareness Activities

CCOHS is a small department and receives limited requests under the Act each year. Therefore, no formal training has been given to staff.

6.0 Policies, Guidelines and Procedures

CCOHS has not implemented any new policies, guidelines or procedures during the year.

7.0 Complaints and Investigations

No complaints were registered with the Office of the Privacy Commissioner during the reporting period.

8.0 Monitoring Compliance

Due to the low volume of requests received, CCOHS does not have a formal or automated tracking system to record completion time. Instead, a manual record is used to track the progress of its requests which is monitored by the Vice-President of Finance and the Financial Administrative Officer. Should there be a need to request an extension, CCOHS' President and Chief Executive officer would be notified.

9.0 Material Privacy Breaches

CCOHS has not implemented any new policies, guidelines or procedures during the year.

10.0 Privacy Impact Assessments

In 2002, Treasury Board issued a policy that requires federal government institutions subject to the *Privacy Act* to conduct Privacy Impact Assessments (PIA) before establishing new programs, systems or policies or before making any substantial modifications to an existing program, system or policy.

During this reporting period, CCOHS did not initiate any Privacy Impact Assessments (PIA) and, therefore, no assessments were forwarded to the Office of the Privacy Commissioner.

11.0 Public Interest Disclosure

Personal information collected by CCOHS in the course of its programs and activities is being disclosed only for the purpose for which it was collected in accordance with paragraph 8(2)(a) of the *Privacy Act*. During 2020-2021, CCOHS did not disclose personal information for any other purposes as outlined in paragraphs 8(2)(b) through (m) inclusively.

Annex A: Delegation Order

Privacy Act – Delegation Order

Pursuant to the powers of delegation conferred upon me by Section 73 of the *Privacy Act*, the person exercising the functions and position of departmental Access to Information and Privacy Coordinator and the respective successor, including in the Coordinator's absence, a person or officer designated in writing to act in the place of the holder of such functions and position is hereby authorized to exercise these powers, duties or functions of the Minister as the head of the government institution under the Act, set out in the attached schedule.

The person exercise the functions and position of departmental Access to Information and Privacy Coordinator and the respective successor, including in the Coordinator's absence, a person or officer designated in writing to act in the place of the holder of such functions and position, is hereby authorized to exercise these powers, duties or functions of the Minister as the head of the government institution under the Act, set out sections 13 and 15 of the Act.

The delegation order supersedes any previous order executed pursuant to section 73 of the Act.



Anne Tennier
President and Chief Executive Officer

JUN 15 18

Date

CANADIAN CENTRE FOR OCCUPATIONAL HEALTH AND SAFETY
SCHEDULE TO THE DELEGATION ORDER

DELEGATION OF POWERS, DUTIES AND FUNCTIONS PURSUANT TO SECTION 73 OF
THE *PRIVACY ACT*

SECTIONS OF ACT	POWERS, DUTIES OR FUNCTIONS	RESPONSIBLE POSITION
8(2)	Disclose personal information without the consent of the individual to whom it relates	ATIP Coordinator
8(4)	Retain a copy of 8(2)(e) requests and disclosed records	ATIP Coordinator
8(5)	Notify the Privacy Commissioner of 8(2)(m) disclosures	ATIP Coordinator
9(1)	Retain a record of the use of personal information	ATIP Coordinator
9(4)	Notify the Privacy Commissioner of a consistent use of personal information and update the index accordingly	ATIP Coordinator
10	Include personal information in personal information banks	ATIP Coordinator
14	Respond to a request for access within statutory deadlines; give access or give notice	ATIP Coordinator
15	Extend the time limit and notify the applicant	ATIP Coordinator
17(2)(b)	Determine the necessity for a translation or interpretation for requested personal information	ATIP Coordinator
18(2)	Refuse to disclose information contained in an exempt bank	ATIP Coordinator
19(1)	Refuse to disclose information obtained in confidence from another government	ATIP Coordinator
19(2)	Disclose any information referred in 19(1) if the other government consents to the disclosure or makes the information public	ATIP Coordinator
20	Refuse to disclose information injurious to federal-provincial affairs	ATIP Coordinator
21	Refuse to disclose information injurious to international affairs and/or defence	ATIP Coordinator
22	Refuse to disclose information injurious to a law enforcement affairs and/or defence	ATIP Coordinator
23	Refuse to disclose information injurious to security clearance	ATIP Coordinator
24	Refuse to disclose information collected by the Canadian Penitentiary Service, the National Parole Service or the National Parole Board	ATIP Coordinator
25	Refuse to disclose information which could threaten the safety of the individual	ATIP Coordinator

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26	Refuse to disclose information about other individuals, and shall refuse to disclose such information where disclosure is prohibited under Section 8	ATIP Coordinator
27	Refuse to disclose information subject to solicitor-client privilege	ATIP Coordinator
28	Refuse to disclose information relating to an individual's physical or mental health where disclosure is contrary to the best interests of the individual	ATIP Coordinator
31	Receive notice of an investigation by the Privacy Commissioner	ATIP Coordinator
33(2)	Make representations to the Privacy Commissioner during an investigation	ATIP Coordinator
35(1)	Receive the Privacy Commissioner's report of findings of the investigation and give notice of action taken	ATIP Coordinator
35(4)	Give the complainant access to information after a 35(1)(b) notice	ATIP Coordinator
36(3)	Receive the Privacy Commissioner's report of findings of investigation of exempt banks	ATIP Coordinator
37(3)	Receive the report of the Privacy Commissioner's findings after a compliance investigation	ATIP Coordinator
51(2)(b)	Request that a matter be heard and determined in the National Capital Region	ATIP Coordinator
51(3)	Request and make representations in Section 51 hearings	ATIP Coordinator
72(1)	Prepare an Annual Report to Parliament	ATIP Coordinator
77	Carry out responsibilities conferred on the head of the institution by regulations made under section 77 which are not included above	

Annex B: Statistical Report on the *Privacy Act*

Statistical Report on the *Privacy Act*

Name of institution: Canadian Centre for Occupational Health and Safety
Reporting period: 2020-04-01 to 2021-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	1
Outstanding from previous reporting period	0
Total	1
Closed during reporting period	0
Carried over to next reporting period	1

Section 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

TBS/SCT 350-63

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Paper	Electronic	Other
0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Section 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Section 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

Number of requests where an extension was taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
0	0	0	0	0	0	0	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

Section 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	1	2	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	1	2	0	0
Closed during the reporting period	1	2	0	0
Carried over to the next reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	1	0	0	0	0	0	1
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	1	0	0	0	0	0	1

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Section 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed	0
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	0	0	0	0

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

Section 11: Resources Related to the *Privacy Act*

11.1 Costs

Expenditures		Amount
Salaries		\$4,250
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$4,250

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.050
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	0.050

Note: Enter values to three decimal places.