



First Nations
**FINANCIAL
MANAGEMENT
BOARD**

Annual Report
on the *Privacy Act*

2018-2019

First Nations Financial Management Board
Annual Report on the *Privacy Act* for 2018-2019

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1. About the *Privacy Act*

The *Privacy Act* came into effect on July 1, 1983. It governs the collection, use, disclosure/sharing, accuracy, protection, retention and disposition of personal information by federal government institutions that are listed in its Schedule 1. It also grants individuals a right to request access to the personal information held about them by these institutions and the right to request the correction of that personal information.

2. About this Annual Report

This report, prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*, accounts for the activities of the First Nations Financial Management Board (FMB) as they pertain to the administration of the *Act* for the April 1, 2018 to March 31, 2019 period.

3. About the First Nations Financial Management Board (FMB)

The primary function of the FMB is to ensure that First Nations people, investors, the public, and governments can have confidence in the financial management of First Nation governments and ultimately in their broader systems of comptrollership. More specifically, the First Nations Fiscal Management Act (FMA) establishes the following mandate for the FMB:

- Assist First Nations in developing the capacity to meet their financial management requirements;
- Assist First Nations in their dealings with other governments respecting financial management, including matters of accountability and shared fiscal responsibility;
- Assist First Nations in the development, implementation and improvement of financial relationships with financial institutions, business partners and other governments, to enable the economic and social development of First Nations;
- Develop and support the application of general credit rating criteria to First Nations;
- Provide review and audit services respecting First Nation financial management;
- Provide assessment and certification services respecting First Nation financial management and financial performance;
- Provide financial monitoring services respecting First Nation financial management and financial performance;
- Provide co-management and third-party management services; and
- Provide advice, policy research and review and evaluative services on the development of fiscal arrangements between First Nations' governments and other governments.

4. Administration of the *Privacy Act*

The FMB became subject to the *Privacy Act* on April 1, 2006. The access to information and protection of privacy (ATIP) program involves three members of the organization on a part time basis, in addition to one consultant who provides technical/professional support as required.

5. Delegation of Authority

The Chief Operations Officer acts as the Access to Information and Privacy Coordinator for the FMB, and there is no Delegation of Authority Order.

6. Interpretation of the Statistical Report for 2018-2019

A copy of the Statistical Report on the *Privacy Act* is annexed to this Report.

a. Requests Received under the *Privacy Act*

The FMB did not receive any access request under the *Privacy Act* during the reporting period.

b. Requests Closed during the Reporting Period

The FMB did not close any access request under the *Privacy Act* during the reporting period.

No exemptions or exclusions were invoked, and there is nothing to report in relation to the following aspects: format of information released, complexity of access requests, deemed refusals and requests for translation.

c. Extension of the Time Limit for Responding to Personal Information Requests

No extensions were taken during the reporting period.

d. Requests for the Correction of Personal Information and Notations

There were no requests for the correction of personal information or notation during the reporting period.

e. Consultations Received from other Institutions and other Organizations

The FMB did not receive any consultation requests from other federal institutions or other organizations.

f. Consultations on Cabinet Confidences

No consultations were undertaken in relation to Cabinet Confidences (section 70 of the *Privacy Act*) during the 2018-2019 fiscal year.

g. Comparative Statistics for the Last Four Fiscal Years

The following table provides statistical figures for the 2014-2015, 2015-2016, 2016-2017, 2017-2018 and 2018-2019 Fiscal Years:

Details	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019
Formal requests received under the <i>Privacy Act</i>	0	0	0	0	0
Requests completed during the reporting period	0	0	0	0	0
Abandoned access requests	0	0	0	0	0
Number of pages processed	0	0	0	0	0
Consultations received from other Government of Canada institutions and other organizations	0	0	0	0	0
Complaints and Investigations	0	0	0	0	0

h. Disclosures pursuant to Paragraphs 8(2)(e), 8(2)(f), 8(2)(g) and 8(2)(m) of the *Privacy Act*

No personal information was disclosed pursuant to paragraphs 8(2)(e), 8(2)(f), 8(2)(g) and 8(2)(m) of the *Privacy Act* during fiscal year 2018-2019.

7. Resources Devoted to the Administration of the *Privacy Act*

The costs related to the administration of the *Privacy Act* incurred by the ATIP Office totalled \$20,425 including \$1,000 in salaries and \$19,425 in consulting services.

8. Privacy Training and Education

No training on access to information and privacy was provided during the 2018-2019 fiscal year.

9. Policies, Guidelines and Procedures

No new policies on access to information and privacy were developed during the reporting period.

10. Key Issues Raised as a result of Complaints and Investigations

No complaints were made against the FMB during the 2018-2019 fiscal year, and no investigations were conducted by the Office of the Privacy Commissioner of Canada.

11. Monitoring of the Time to Process Access to Personal Information Requests

The FMB did not implement any new special procedure to monitor the time it takes to process personal information requests.

12. Privacy Impact Assessments

Two Privacy Impact Assessment were conducted during the reporting period:

- One in relation to a “Software as a Service” (Cloud-based) initiative to support the FMB’s operational activities;

- One in relation to a “Software as a Service” (Cloud-based) initiative for the management of Human Resources information.

13. Material Privacy Breaches

No known privacy breach occurred during the 2018-2019 fiscal year.

Appendix A - Statistical Report on the *Privacy Act*

**Appendix B - Additional Reporting Requirements Pertaining to the
*Privacy Act***

Privacy Impact Assessments	
Section	Number of requests
Privacy Impact Assessments initiated	2
Privacy Impact Assessments completed	2



Statistical Report on the *Privacy Act*

Name of institution: First Nations Financial Management Board

Reporting period: 2018-04-01 to 2019-03-31

Part 1: Requests Under the *Privacy Act*

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

Part 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

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	28	0
21	0	22.3	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

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
Total	0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	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 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline 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

2.7 Requests for translation

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

Part 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

Part 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

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	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
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

Part 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	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the 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	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

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	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	Total
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

Part 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

Part 8: Complaints and Investigations Notices Received

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

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	2
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Part 10: Resources Related to the Privacy Act

10.1 Costs

Expenditures		Amount
Salaries		\$1,000
Overtime		\$0
Goods and Services		\$19,425
• Professional services contracts	\$19,425	
• Other	\$0	
Total		\$20,425

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.00
Part-time and casual employees	3.00
Regional staff	0.00
Consultants and agency personnel	0.25
Students	
Total	3.25

Note: Enter values to two decimal places.