



ANNUAL REPORT TO PARLIAMENT

Privacy Act

**For the period from
April 1, 2019 to March 31, 2020**

REVERA INC.

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ANNUAL REPORT TO PARLIAMENT

PRIVACY ACT

(APRIL 1, 2019 TO MARCH 31, 2020)

FOREWORD

This Annual Report to Parliament has been prepared in accordance with Section 72 of the *Privacy Act* (the “Act”). It is intended to describe how Revera Inc. (“Revera”) administered its responsibilities in relation to the Act for the reporting period from April 1, 2019 to March 31, 2020.

Annual Reports are to be tabled in Parliament in accordance with section 72 of the *Privacy Act*.

MANDATORY REPORTING REQUIREMENTS

1. INTRODUCTION

1.1 SUMMARY

The purpose of the Act is to extend the present laws of Canada that protect the privacy of individuals with respect to their personal information held by a government institution and to provide individuals with a right of access to that information.

1.2 MANDATE

Revera is a leading owner, operator, investor in, and developer of the senior living sector. Through its portfolio of partnerships, Revera owns or operates more than 500 properties across Canada, the United States and the United Kingdom, serving more than 55,000 seniors. Revera offers seniors' apartments, independent living, assisted living, memory care, and long-term care. With approximately 50,000 employees dedicated to providing exceptional care and service, Revera provides seniors with choices that help them do more of the things that bring joy to their lives. Through Revera's Age is More program, Revera is committed to challenging ageism, Revera's social cause of choice.

2. STRUCTURE OF THE INSTITUTION TO FULFILL ITS RESPONSIBILITIES

Revera is a wholly-owned subsidiary of the Public Sector Pension Investment Board ("PSP Investments"). The Privacy Office at Revera consists of an Access to Information and Privacy Coordinator, who is also Revera's Privacy Officer, and an Assistant Privacy Officer (Canadian Operations). There are no service agreements under section 73.1 of the Act to which Revera was party during the reporting period.

3. DELEGATION ORDER

Revera Inc., a wholly-owned subsidiary of
Public Sector Pension Investment Board,
and its Wholly-Owned Subsidiaries

Delegation Order ("Order")
(Section 73, *Access to Information Act*,
R.S.C. 1985, c. A-1, as amended and section 73, *Privacy Act*, R.S.C. 1985, c. P-21, as amended)

1. This Order may be cited as the "Revera Inc. and wholly-owned subsidiaries of Revera Inc. Head of Institution Delegation Order pursuant to the *Access to Information Act* and *Privacy Act*".
2. Pursuant to section 73 of the *Access to Information Act* and section 73 of the *Privacy Act*, the undersigned, acting in his capacity as head of Revera Inc. and its Wholly-Owned Subsidiaries in the existence as of the date of this Order as well as those which may hereafter be established (the "Government Institutions"), hereby designates the person holding the position set out in the schedule set forth in Section 4 below, or the person occupying on an acting basis this position, to exercise his powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite the position. This Delegation Order replaces all previous delegation orders for the Government Institutions.
3. For the purposes of this Order, "Wholly-Owned Subsidiaries" shall include all Canadian wholly-owned subsidiaries of Revera Inc. which are corporations, with the exception of those subsidiaries with their own heads.
4. Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Access to Information And Privacy Coordinator	Full authority	Full authority

This Delegation Order has been made at Mississauga, on the 16th day of May, 2016.



Thomas G. Wellner
President and Chief Executive Officer

**Revera Inc., a wholly-owned subsidiary of
Public Sector Pension Investment Board,
and its Wholly-Owned Subsidiaries**

**Delegation Order (“Order”)
(section 95(1), *Access to Information Act*,
R.S.C. 1985, c. A-1, as amended and section 73, *Privacy Act*, R.S.C. 1985, c. P-21, as amended)**

1. This Order may be cited as the “Revera Inc. and wholly-owned subsidiaries of Revera Inc. Head of Institution Delegation Order pursuant to the *Access to Information Act* and *Privacy Act*”.
2. Pursuant Section 95(1) of the *Access to Information Act* and Section 73 of the *Privacy Act*, the undersigned, acting in his capacity of head of Revera Inc. and its Wholly-Owned Subsidiaries in existence as of the date of this Order as well as those which may hereafter be established (the “Government Institutions”), hereby designates the person holding the position set out in the schedule set forth in Section 4 below, or the person occupying on an acting basis this position, to exercise his powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite the position. This Delegation Order replaces all previous delegation orders for the Government Institutions.
3. For the purposes of this Order, “Wholly-Owned Subsidiaries” shall include all Canadian wholly-owned subsidiaries of Revera Inc. which are corporations, with the exception of those subsidiaries with their own heads.
4. Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Access to Information and Privacy Coordinator	Full authority	Full authority

This Delegation Order has been made at Mississauga, on the 21st day of June, 2019.



Thomas G. Wellner
President and Chief Executive Officer

4. INTERPRETATION OF THE STATISTICAL REPORT

No privacy requests were received during the reporting period. This is consistent with the previous year. Due to the limited number of privacy requests received, no meaningful trends can be identified.

There were no requests carried over from a previous year.

No consultations were received or completed during this reporting period.

The completed statistical report is attached.

COVID-19 did not have an impact on Revera's ability to fulfill its responsibilities under the Act.

5. PRIVACY-RELATED EDUCATION AND TRAINING ACTIVITIES UNDERTAKEN BY PRIVACY STAFF AND PROVIDED TO INSTITUTION'S EMPLOYEES

During the reporting period, Revera's online privacy training module was completed by 232 individuals at Revera's corporate support office. It was also completed at 22 long-term care homes and 34 retirement residences managed by Revera.

6. OVERVIEW OF NEW AND/OR REVISED INSTITUTIONAL *PRIVACY ACT* RELATED POLICIES AND PROCEDURES IMPLEMENTED DURING THE REPORTING PERIOD

Revera did not implement any new privacy policies, guidelines, procedures, or initiatives during the reporting period. Minor revisions were made to certain privacy-related policies and procedures to correct minor errors and provide additional clarity on certain matters.

PSP Investments developed an internal procedure for handling Privacy requests in September 2007 upon becoming subject to the Act. As part of an annual revision process, the procedure was revised on January 15, 2013. The same procedure is also applied for any privacy requests that may be received by Revera.

7. COMPLAINTS AND/OR INVESTIGATIONS

Revera has not received any complaints during this reporting period, and no audits or investigations were concluded.

8. MONITORING

Revera very rarely receives privacy requests or requests for the correction of personal information under the Act. As a result, there is no procedure in place to monitor the time to process these requests and the level of officials advised. Generally, when privacy requests or requests for the correction of

personal information are received, the Privacy Officer or Assistant Privacy Officer monitors time manually. The time taken to process these requests is then recorded in tracking charts maintained by the Privacy Office.

9. MATERIAL PRIVACY BREACHES

No material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and to the Treasury Board of Canada Secretariat (Information and Privacy Policy Division) during the reporting period.

10. PRIVACY IMPACT ASSESSMENT

No Privacy Impact Assessments were completed during the reporting period.

11. DISCLOSURE OF PERSONAL INFORMATION

During the reporting period, Revera did not make any disclosures of personal information pursuant to paragraph 8(2)(m) of the Act.

Statistical Report on the *Privacy Act*

Name of institution: Revera Inc.

Reporting period: 2019-04-01 to 2020-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	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

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

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		

2.5.3 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 (%)	100

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

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		\$15,000
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$15,000

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.10
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.10

Note: Enter values to two decimal places.

2019-2020 Supplemental Statistical Report – Requests affected by COVID-19 measures

Supplemental Statistical Report on the *Privacy Act*

The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 4 – Requests Received

		Column (Col.) 1
		Number of requests
Row 1	Received from 2019-04-01 to 2020-03-13	0
Row 2	Received from 2020-03-14 to 2020-03-31	0
Row 3	Total¹	0

¹ – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 1

The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 5 – Requests Closed

		Col. 1	Col. 2
		Number of requests closed within the legislated timelines	Number of requests closed past the legislated timelines
Row 1	Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting periods	0	0
Row 2	Received from 2020-03-14 to 2020-03-31	0	0
Row 3	Total²	0	0

² – Total for Row 3 Col. 1 should equal the total in the Privacy Statistical Report Section 2.6.1 Row 1 -- Total for Row 3 Col. 2 should equal the total in the Privacy Statistical Report Section 2.7.1. Col. 1 Row 1

The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 6– Requests Carried Over

		Col. 1
		Number of requests
Row 1	Requests from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	0
Row 2	Requests from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	0
Row 3	Total³	0

³ – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 5