

Statistics Canada Policy on the Use of Administrative Data Obtained under the *Statistics Act*

Important notice

The Chief Statistician may grant exemptions from this governing instrument, unless otherwise required by Canadian law or Government of Canada policies.

1. Effective date

1.1. This policy takes effect on March 30, 2022.

1.2. This policy replaces the Policy on the Use of Administrative Data Obtained under the Statistics Act dated December 2, 2015.

2. Application

2.1. This policy applies to all statistical programs of Statistics Canada and to the divisions that support those programs.

3. Context

3.1. Using administrative data responsibly means the agency can improve data quality, meet new and ongoing information needs, reduce data collection costs, and save time for Canadians who respond to Statistics Canada surveys.

3.2. This policy instills a management regime upon which authorities and resources are allocated and administrative responsibilities are delegated, to ensure that management practices and decisions are consistent and sound across the agency when determining what needs to be measured and how best to do it.

4. Objectives and expected results

4.1. The objectives of this policy are to

- **4.1.1** establish a solid governance framework where data and insights already present in the data ecosystem are leveraged to respond to the information needs of Canadians, before surveys or other collection methods are used
- **4.1.2** facilitate the use of administrative data in Statistics Canada's statistical programs while complying with all requirements of the Statistics Act; the Privacy Act; and any other relevant legislation, policy or agreement
- **4.1.3** ensure the ethical use of administrative data, and limit their acquisition to what is necessary to fulfill Statistics Canada's mandate
- **4.1.4** increase transparency and maintain public trust while producing relevant, high-quality information for the benefit of all Canadians.

4.2. The expected results of this policy are that

- **4.2.1** Statistics Canada's use of administrative data complies with all relevant legislation and government policy
- **4.2.2** administrative data sources are identified and accessed more frequently for use in statistical programs
- **4.2.3** the volume of administrative data and administrative data sources required by program areas is balanced with response burden, while maintaining protection of privacy, through the application of the corporately approved Necessity and Proportionality Framework
- **4.2.4** data and insights already present in the data ecosystem are leveraged to respond to the information needs of Canadians before surveys or other collection methods are used
- **4.2.5** corporately recognized tools are used to assess and document the fitness for use of administrative data, and statistical programs report on the

data quality and methodology of statistical outputs using administrative data

- **4.2.6** the responsible statistical use of administrative data allows the agency to meet new and ongoing information needs and save time for Canadians who respond to Statistics Canada surveys
- **4.2.7** data providers are treated consistently across statistical programs, and a collaborative approach to the application of the *Statistics Act* is taken
- **4.2.8** administrative data obtained for use in a statistical program are a corporate resource available to all statistical programs with a demonstrated need
- **4.2.9** arrangements with data providers are documented in accordance with Statistics Canada's governing instruments
- **4.2.10** a data custodian is identified for each administrative data source. The data custodian obtains and manages data access on behalf of Statistics Canada
- **4.2.11** all administrative data obtained for use in statistical programs are documented in a corporate inventory
- **4.2.12** researchers with a demonstrated need are provided with equitable, timely and secure access to identifiable administrative data
- **4.2.13** requests for administrative data and their intended uses are communicated to stakeholders and the public in a proactive, coherent, accountable, transparent and ethical manner, enhancing data literacy and maintaining public trust in the agency
- **4.2.14** Statistics Canada promotes avoidance of the duplication of information collected by government departments by using administrative data in its statistical programs.

5. Requirements

5.1. The Chief Statistician is responsible for

- **5.1.1** authorizing managers to obtain administrative data for use in Statistics Canada's statistical programs
- **5.1.2** granting exemptions from the requirements of this policy, unless otherwise required by Canadian law or Government of Canada policies.

5.2. The Principal Data Officer is responsible for

- **5.2.1** developing the agency's strategy to improve and augment the use of administrative data for statistical purposes
- **5.2.2** providing leadership for the efficient and effective use of administrative data in Statistics Canada's statistical programs, and for its responsible stewardship throughout the agency
- **5.2.3** acting as the senior external representative of Statistics Canada on matters relating to the statistical use of administrative data, including liaising with assistant chief statisticians who represent Statistics Canada at other senior-level external forums where administrative data may be discussed
- **5.2.4** coordinating Statistics Canada's participation in interdepartmental, intergovernmental and international administrative data initiatives, in collaboration with other divisions of Statistics Canada
- **5.2.5** investigating and acting when significant issues regarding policy compliance arise, and ensuring that appropriate remedial action is taken to address these issues within the agency
- **5.2.6** reporting to the Chief Statistician on Statistics Canada's activities related to the statistical use of administrative data.

5.3. The Principal Data Ethics and Scientific Integrity Officer is responsible for

- **5.3.1** overseeing the provision of ethical considerations related to the acquisition and use of administrative data
- **5.3.2** implementing the corporate Necessity and Proportionality Framework to assist statistical program managers in jointly maximizing the production of

information, along with privacy protection, when designing a data-gathering approach.

5.4. The Director, Office of Privacy Management and Information Coordination, is responsible for

- **5.4.1** establishing and championing sound data governance and stewardship practices throughout the agency
- **5.4.2** establishing a corporate approach and associated tools to facilitate the acquisition, use and management of administrative data
- **5.4.3** supporting statistical programs at Statistics Canada in their acquisition and use of administrative data
- **5.4.4** providing information, advice and support for the interpretation of the *Statistics Act* and other relevant legislation and policy instrument provisions relating to administrative data (including agreements with data providers, confidentiality, privacy, discretionary disclosure, data sharing, microdata linkage and information management) and coordinating legal advice with the Department of Justice.

5.5. Senior managers of statistical programs, and of programs that provide support to statistical programs, are responsible for

- **5.5.1** identifying opportunities to use administrative data in their statistical programs
- **5.5.2** fulfilling Statistics Canada's legal obligation to publish any mandatory request for information before the request is made, pursuant to subsection 8(2) of the *Statistics Act*
- **5.5.3** fulfilling Statistics Canada's legal obligation to notify the Minister of any new mandatory request for information prior to the request being published, pursuant to subsection 8(3) of the *Statistics Act*

- **5.5.4** serving as data custodian for administrative data that are acquired for use in their statistical programs
- **5.5.5** using administrative data in their statistical programs where possible, including the dissemination of statistical outputs that incorporate administrative data
- **5.5.6** ensuring existing administrative data sources are adequately considered when responding to the information needs of Canadians before proceeding with new or revised survey collection from respondents
- **5.5.7** ensuring the confidentiality of statistical outputs that are based on administrative data
- **5.5.8** ensuring that a quality evaluation has been completed to assess the fitness of use of all administrative data used in a statistical program
- **5.5.9** ensuring that the core processing of administrative data that are used by multiple statistical programs is carried out in a coordinated, central way, and that these data are made available for further local processing and use in statistical programs in accordance with the terms and conditions agreed to with the data provider.

5.6. The Director, Data Access Division, is responsible for

- **5.6.1** providing governance on all aspects of requests for deemed employees to access identifiable administrative data.

5.7. The Principal Information Officer is responsible for

- **5.7.1** developing or coordinating with other parties, such as Shared Services Canada, corporate-wide informatics frameworks and solutions for the acquisition, use, management and security of administrative data sources for statistical purposes.

5.8. The Principal Communications Officer is responsible for

- **5.8.1** raising awareness about and ensuring visibility of Statistics Canada's corporate approach to the acquisition, use and protection of administrative data in a proactive, coherent and transparent manner, to ensure consistency in these activities across all statistical programs and transparency with the public.

5.9. The Director General, Modern Statistical Methods and Data Science Branch, is responsible for

- **5.9.1** overseeing the provision of methodological advice and services to statistical programs for the statistical use of administrative data, including assessing quality, processing data, protecting confidentiality, and reporting on the data quality and methodology of statistical outputs that employ administrative data.

5.10. The Chief Audit Executive is responsible for

- **5.10.1** performing audits, reviews or advisory engagements included in the Multi-year Risk-based Audit and Evaluation Plan, and upon request from senior management when required.

6. Consequences of non-compliance

Consequences of non-compliance with this policy may include

6.1. formal direction from Statistics Canada senior management on corrective measures.

7. References

7.1. Legislation

- *Statistics Act*

- *Privacy Act*
- *Access to Information Act*
- *Personal Information Protection and Electronic Documents Act (PIPEDA)*
- *Income Tax Act*
- *Excise Tax Act*
- *Customs Act*
- *Library and Archives Act*
- *Financial Administration Act*

7.2. Related governing instruments

- Treasury Board Policy on Privacy Protection
- Treasury Board Policy on Service and Digital
- Statistics Canada Policy on Information Management
- Statistics Canada Policy on Informing Users of Data Quality and Methodology
- Statistics Canada Policy on Microdata Access
- Statistics Canada Policy on Privacy and Confidentiality
- Statistics Canada Directive on Conducting Privacy Impact Assessments
- Statistics Canada Directive on Data Sharing
- Statistics Canada Directive on Discretionary Disclosure
- Statistics Canada Directive on Informing Survey Respondents
- Statistics Canada Directive on the Management of Aggregate Statistics
- Statistics Canada Directive on the Management of Statistical Microdata Files
- Statistics Canada Directive on Microdata Linkage
- Statistics Canada Directive on Prescription
- Statistics Canada Directive on the Security of Sensitive Statistical Information
- Statistics Canada Directive on the Transmission of Protected Information
- Statistics Canada Directive on the Use of Deemed Employees

8. Enquiries

For interpretation of any aspect of this policy, contact the Director, Office of Privacy Management and Information Coordination.

Appendix A: Definitions

Administrative data (*Données administratives*)

Information that is collected by organizations and departments for their own purposes, and is sought, at the micro or aggregate level, by Statistics Canada in respect to the objects of the *Statistics Act*. It excludes data that do not pertain to Canadian society or the Canadian economy or environment. By definition, Statistics Canada's use of this information for statistical purposes is secondary to the objective of the original collector of the information. Administrative data include the traditional sources—for example, various datasets received from the Canada Revenue Agency—and also alternative sources, such as data obtained from surveys conducted by others without Statistics Canada's involvement and data generated by electronic devices (e.g., satellites, sensors, scanners, mobile phones) that are gathered by organizations. **Exclusions:** Administrative data should not be confused with products that may be obtained from organizations such as publications, reports, guides, metadata and computer programs. They also exclude data or information that is available to the public, including on the Internet, or data that can be obtained, under licence or not, by anyone, with or without a fee.

Administrative Data Acquisition Agreement (*Entente d'acquisition de données administratives*)

A written document describing terms and conditions agreed to by Statistics Canada and one or more other organizations for the receipt of administrative data

under the authority of the *Statistics Act*. All administrative data acquisition agreements must communicate these three essential elements to the other organization:

- Statistics Canada's legal authority to obtain the administrative data
- Statistics Canada's intended use of the administrative data
- Statistics Canada's legal requirements to protect the administrative data.

Alternative data (*Données d'autres sources*)

Any data that are not collected through a Statistics Canada survey or census. Examples of alternative data include administrative data, data available to the public, project-specific external data, and web-scraped data.

Alternative Data Inventory (*Répertoire des données d'autres sources*)

A central repository of metadata information on various types of alternative data, such as administrative data, data that are available to the public, and web-scraping activities that have been obtained, or are in the process of being obtained, for use in a Statistics Canada statistical program.

Data custodian (*Administrateur des données*)

At Statistics Canada, the data custodian is the person who has been given the responsibility to obtain and manage the access to the administrative or alternative data on behalf of Statistics Canada.

Data provider (*Fournisseur de données*)

A department of government (including those of the provinces or territories), a municipal office, a corporation, a business or an organization that has custody of administrative data and provides them to Statistics Canada for the purposes of

the *Statistics Act*. A provider of administrative data under the *Statistics Act* cannot be an individual.

Deemed employee (*Personne réputée être employée*)

Any person, not currently an employee of Statistics Canada, retained to provide a service to Statistics Canada pursuant to the *Statistics Act*, for which access to information protected by the *Statistics Act* is required to perform the service.

Direct identifiers (*Identificateurs directs*)

Information that permits the direct identification of an individual, business or organization. Examples of direct identifiers are name; address; telephone number; and government-issued identification numbers such as Social Insurance Number, Provincial Health Number and Business Number. Direct identifiers may be used by Statistics Canada for many statistical purposes—for example, communicating with an individual to collect or verify information, and microdata linkage.

Governance Process for the Acquisition and Use of Alternative Data (*Processus de gouvernance pour l'acquisition et l'utilisation de données d'autres sources*)

A mandatory process that ensures Statistics Canada's requirements under the *Statistics Act* are met, in addition to privacy, ethical and corporate requirements. The process supports the efforts of statistical program managers, data custodians and data stewards throughout the acquisition and integration of alternative data by providing advice and solutions to facilitate horizontal awareness and vertical accountability. The process was built to be compliant by design and consists of three main stages—Initiate and classify, Assess, and Transparency—and incorporates specific tasks that must be completed prior to requesting data.

Identifiable administrative data (*Données administratives identifiables*)

Administrative data that could directly or indirectly identify an individual person, business or organization. This includes both microdata and aggregated data at a confidential level.

Microdata linkage (*Couplage de microdonnées*)

Microdata linkage is the combining of two or more micro-records to form a composite record containing information about the same entity. The output of a microdata linkage must contain information that originated from two or more data files that were inputs to the linkage activity.

Necessity and Proportionality Framework (*Cadre de nécessité et de proportionnalité*)

The [Necessity and Proportionality Framework](#) is an approach that has been developed to jointly maximize the production of information and privacy protection when designing a data-gathering approach. The framework provides both a justification and a guide for designing strategies to gather sensitive data using surveys, administrative sources obtained from the public or private sector, or any other method. When data are acquired, the justification documents are evaluated in light of this framework.

Personal information bank (*Fichiers de renseignements personnels*)

A personal information bank is a description of personal information that is organized and retrievable by a person's name or by an identifying number, symbol or other particular assigned only to that person. The personal information described in the personal information bank is under the control of a government institution.

Privacy impact assessment (*Évaluation des facteurs relatifs à la vie privée*)

A privacy impact assessment is a process for identifying, assessing and mitigating privacy risks. Government institutions are to develop and maintain privacy impact assessments for all new or modified programs and activities that involve the use of personal information for an administrative purpose. Statistics Canada also undertakes privacy impact assessments for its statistical programs that involve the collection, creation, use and disclosure of personal information.

Project-specific external data (*Données externes propres à un projet*)

Data disclosed to Statistics Canada strictly for the provision of a statistical service, or by a deemed employee as part of an approved project. Statistics Canada does not request access to project-specific external data, and the data will not be used for any Statistics Canada program. Their use is clearly defined in the letter of agreement, memorandum of understanding or microdata access agreement.

Request for information (*Demande de renseignements*)

Any request for information authorized pursuant to sections 7 and 8 of the *Statistics Act*. The publication of mandatory requests for information (for administrative data) ensures transparency prior to the request being made. This publication fulfills Statistics Canada's legal obligation as described in the *Statistics Act* (subsection 8(2)). The minimum publication period of 10 working days allows sufficient time for Canadians to become aware of the request and express any concerns or ask questions. The minimum publication period may be increased further to public reaction, upon consultation and recommendation by the Office of Privacy Management and Information Coordination, Strategic Communications and Planning Division, and senior management.

Statistical purposes (*Fins statistiques*)

Uses of information by Statistics Canada to meet its legislated mandate. Such uses must be authorized and permitted by the *Statistics Act* and *Privacy Act*, as well as by central agency (i.e., Treasury Board Secretariat) and departmental policies and practices.