

**From:** [Lisa Lynam](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** RE: Drafts of 2814: Collection of PI statement  
**Date:** Monday, June 24, 2013 4:55:30 PM

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Looks like it was discussed today. :-)

If I have further questions, I'll follow up with you.

Thank you.

Lisa Lynam  
Senior Communications Analyst  
[MAXIMUS BC Health Inc.](#)  
Phone: 250-405-3683  
Email: [lisa.lynam@maximusbc.ca](mailto:lisa.lynam@maximusbc.ca)  
Web: [www.maximuscandada.ca](http://www.maximuscandada.ca)

S22

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**From:** Lisa Lynam  
**Sent:** Monday, June 24, 2013 4:51 PM  
**To:** 'Thambirajah, Natasha HLTH:EX'  
**Subject:** FW: Drafts of 2814: Collection of PI statement

Hi Natasha,

Good afternoon. Hoping to work with you on this issue this week so we can complete the 2814 form.

Thanks,  
Lisa

Lisa Lynam  
Senior Communications Analyst  
[MAXIMUS BC Health Inc.](#)  
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**From:** Lisa Lynam  
**Sent:** Friday, June 21, 2013 1:06 PM  
**To:** 'Pearce, Alison HLTH:EX'  
**Subject:** RE: Drafts of 2814: Collection of PI statement

Thanks Alison.

Lisa Lynam  
Senior Communications Analyst  
[MAXIMUS BC Health Inc.](#)  
Phone: 250-405-3683  
Email: [lisa.lynam@maximusbc.ca](mailto:lisa.lynam@maximusbc.ca)  
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**From:** Pearce, Alison HLTH:EX [mailto:[Alison.Pearce@gov.bc.ca](mailto:Alison.Pearce@gov.bc.ca)]  
**Sent:** Friday, June 21, 2013 12:44 PM  
**To:** Lisa Lynam  
**Subject:** RE: Drafts of 2814: Collection of PI statement

Hi Lisa. Sorry I haven't got back to you. I have asked Natasha to work with you to resolve this issue.

Alison

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**From:** Lisa Lynam [mailto:[lisa.lynam@maximuscanada.ca](mailto:lisa.lynam@maximuscanada.ca)]  
**Sent:** Friday, June 21, 2013 12:32 PM  
**To:** Pearce, Alison HLTH:EX  
**Cc:** Hallihan, Marj HLTH:EX; Thambirajah, Natasha HLTH:EX  
**Subject:** RE: Drafts of 2814: Collection of PI statement

Hi Alison,

Any further direction on this form? We have completed the revisions for everything else on this form and implementation is pending confirmation on the proper, acceptable PI statement by your office.

The pending form is attached. It contains the statement PI statement as follows which also represents the Hospital Insurance Act necessary for this form. Please advise if there is a change required for BC Services Card as was originally approved.

Personal information on this form is collected under the authority of the *Medicare Protection Act* and the *Hospital Insurance Act*. The information will be used to determine residency in BC and determine eligibility for provincial health care benefits. If you have any questions about the collection of this information, contact an MSP client representative at the address or telephone number

shown in Section D of the form. Personal information is protected from unauthorized use and disclosure in accordance with the *Freedom of Information and Protection of Privacy Act* and may be disclosed only as provided by that Act.

Lisa Lynam

Senior Communications Analyst

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**From:** Hallihan, Marj HLTH:EX [<mailto:Marjorie.Hallihan@gov.bc.ca>]

**Sent:** Thursday, June 13, 2013 10:16 AM

**To:** Pearce, Alison HLTH:EX

**Cc:** Lisa Lynam

**Subject:** FW: Drafts of 2814: Collection of PI statement

Hi Alison,

We're working with HIBC on the out-of-country forms (purpose is payment of ooc claims and release of money to a 3<sup>rd</sup> party insurer). Lisa raised the how the form refers to the authority to collect the information. I would like to use our standard statement; however, I understand the BMO has directed HIBC to use the enrolment statement. Can you review the details and provide advice? Perhaps a new statement has to blend the authority and purpose together. Thank you, Marj

*Personal information on this form is collected under the authority of the Medicare Protection Act and the Hospital Insurance Act. The information will be used to determine residency in BC and determine eligibility for provincial health care benefits. If you have any questions about the collection of this information, contact an MSP client representative at the address or telephone number shown in Section D of the form. Personal information is protected from unauthorized use and disclosure in accordance with the Freedom of Information and Protection of Privacy Act and may be disclosed only as provided by that Act.*

The personal information you will provide will be collected for the following purposes:

**Enrolment in the Medical Services Plan; and,**

**Application for a BC Services Card and its authorized programs.**

Personal information is collected under the authority of the *Medicare Protection Act* and section 26 (c) of the *Freedom of Information and Protection of Privacy Act* ("FIPPA").

Information may be disclosed pursuant to section 33 of FIPPA.

If you have any questions about the collection and use of your personal information, please contact: Health Insurance BC Chief Privacy Office, PO Box 9035 STN PROV GOVT, Victoria, BC V8W 9E3 or call 604 683-7151 (Vancouver) or 1 800 663-7100 (toll-free).

*Marj Hallihan*

Out of Country Advisor  
Medical Services Operations and Policy  
Ministry of Health  
3-1 1515 Blanshard St  
Victoria, BC V8W 3C8  
Phone: 250 952 1676  
Fax: 250 953 0422

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**From:** Lisa Lynam [<mailto:lisa.lynam@maximuscana.ca>]

**Sent:** Wednesday, June 12, 2013 2:58 PM

**To:** Hallihan, Marj HLTH:EX

**Subject:** RE: Drafts of 2814: Collection of PI statement

Hi Marj

Tami just                      S22                      yesterday so we're looking to move forward with updating this form.

Although the BMO statement does refer to enrolment as a singular purpose, I believe that it was determined that the statement would apply if there was address collection information that could change their account record. I think it gets more complicated now with ICBC and data sharing for the BC Services Card.

The BMO did the reviews on the form in April (MSOP were reviewers as well) and have directed us to apply the red statement below to this form. If it needs to include additional act, could you consult with Alison Pearce to determine (perhaps with legal counsel) where that needs to be added in the statement below?

Thanks.

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**From:** Hallihan, Marj HLTH:EX [<mailto:Marjorie.Hallihan@gov.bc.ca>]

**Sent:** Friday, May 24, 2013 3:48 PM

**To:** Lisa Lynam

**Cc:** Anthony Forrest

**Subject:** RE: Drafts of 2814: Collection of PI statement

Hi Lisa,

The BMO statement refers to collection of personal information for a singular purpose – enrolment under the authority of the Medicare Protection Act.

The OOC claim form allows a BC resident to collect benefits under both the MPA (if enrolled with MSP) and the HIA (is a resident). I believe the statements are for two different actions – the enrolment under MPA and the claim for provincial reimbursement – benefits under both the MPA and HIA. Does this help? Marj

*Marj Hallihan*

Out of Country Advisor

Medical Services Operations and Policy

Ministry of Health

3-1 1515 Blanshard St

Victoria, BC V8W 3C8

Phone: 250 952 1676

Fax: 250 953 0422

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**From:** Lisa Lynam [<mailto:lisa.lynam@maximuscanda.ca>]

**Sent:** Friday, May 24, 2013 3:25 PM

**To:** Hallihan, Marj HLTH:EX

**Cc:** Anthony Forrest

**Subject:** RE: Drafts of 2814: Collection of PI statement

HI Marjorie,

As per our discussion, here are the PI statements below.

Could you review and make suggestion for how the Hospital Insurance Act needs to be covered in the updated statement provided to us by the BMO (in red)?

I will follow up with Tami and our OOC staff on reviewing the form changes.

Thanks,  
Lisa

Personal information on this form is collected under the authority of the *Medicare Protection Act* and the *Hospital Insurance Act*. The information will be used to determine residency in BC and determine eligibility for provincial health care benefits. If you have any questions about the collection of this information, contact an MSP client representative at the address or telephone number shown in Section D of the form. Personal information is protected from unauthorized use and disclosure in accordance with the *Freedom of Information and Protection of Privacy Act* and may be disclosed only as provided by that Act.

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Application for a BC Services Card and its authorized programs.**

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-----Original Message-----

From: Hayes, Tami HLTH:EX [<mailto:Tami.Hayes@gov.bc.ca>]

Sent: Monday, May 13, 2013 2:29 PM

To: Lisa Lynam

Subject: Fwd: Drafts of 2814 and 2810

This is the last email I have on the 2814, back in November.

Tami

Begin forwarded message:

From: "Hallihan, Marj HLTH:EX" <[Marjorie.Hallihan@gov.bc.ca](mailto:Marjorie.Hallihan@gov.bc.ca)<<mailto:Marjorie.Hallihan@gov.bc.ca>>>  
Date: November 16, 2012 8:47:28 AM PST  
To: "Hayes, Tami HLTH:EX" <[Tami.Hayes@gov.bc.ca](mailto:Tami.Hayes@gov.bc.ca)<<mailto:Tami.Hayes@gov.bc.ca>>>  
Subject: RE: Drafts of 2814 and 2810

Hi Tami,  
Thanks for the drafts. I'm going to meet with the OOC supervisor/folks over at HIBC, to talk about the info on the forms. The layout looks great. TY, Marj

Marj Hallihan  
Out of Country Advisor  
Medical Services Operations and Policy  
Ministry of Health  
3-1 1515 Blanshard St  
Victoria, BC V8W 3C8

Phone: 250 952 1676 Fax: 250 953 0422

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From: Hayes, Tami HLTH:EX  
Sent: Wednesday, November 14, 2012 2:24 PM  
To: Hallihan, Marj HLTH:EX  
Subject: Drafts of 2814 and 2810

Hi Marj.

Here are the drafts for the two forms.

---

Regards,

Tami Hayes, A/ Senior Forms Analyst  
Forms Management  
Facilities Management and Support Services  
Ministry of Health  
1-1, 1515 Blanshard Street  
Victoria BC Canada V8W 3C8  
Tel: 250 952-2231  
Fax: 250 952-2194  
[Tami.Hayes@gov.bc.ca](mailto:Tami.Hayes@gov.bc.ca)<mailto:Tami.Hayes@gov.bc.ca>





955527

Ms. Elizabeth Denham  
British Columbia Information and Privacy Commissioner  
Office of the Information and Privacy Commissioner  
for British Columbia  
PO Box 9038 Stn Prov Govt  
Victoria BC V8W 9A4

Dear Ms. Denham:

**Re: Communications Materials for the new BC Services Card**

As requested, the enclosed binder contains a portfolio of the communications materials for the BC Services Project for your review. The portfolio includes the following items:

**A. Systems Generated Directed Documents**

1. Notice to Renew (ICBC) - driver's licence or BC Identification Card (BCID)
2. Insert – BC Services Card to accompany Notice to Renew
3. Notification to renew enrolment in the Medical Services Plan (Health Insurance BC)
4. Interim BC Services Card – receipt from driver licensing office front counter
5. Interim BC Driver's Licence and Services Card – receipt from driver licensing office front counter
6. Problem at the counter card – ICBC agent will provide to person who is unsuccessful at the front counter in getting a photo BC Services Card
7. Card carrier – combined BC Driver's Licence and Services Card (Card is affixed to and mailed in an envelope);
8. Card carrier - photo and non-photo BC Services Card.

**B. Public Campaign – Digital, Print and Interior Bus Ads**

1. Poster versions for the BC Services Card
2. Interior transit ads - inside buses
3. The Vizeum media buy;

### **C. Voice Messaging System - Health Insurance BC**

1. Interactive Voice Response System – to ensure collection of personal information notification is provided to beneficiaries seeking the non-photo card

### **D. Websites**

1. Carousel image for ICBC, BC Services Card, and Medical Services Plan websites;
2. Landing page and the privacy page – bcservicescard.ca

### **E. Research**

1. Angus Reid public poll results on the BC Services Card
2. Focus Group Report - Mustel Group focus group tested the creative image for card

In addition to the binder, the bcservicescard.ca content is on a test site. As the website is still in the test environment, if you and your staff would like to review the contents of this site, please forward names to Alison Pearce, Director, Business Transformation and Policy, to ensure access to this site.

Three collateral pieces intended for health provider and other sites are still in draft and are not complete; two brochures and a tear-off pad. Upon completion, these three documents will be submitted to your office for review including:

- The Medical Services Plan brochure
- Tri-fold brochure
- Tear-off sheet

There are plans to translate two BC Services Card public collateral pieces into French, Simplified Chinese and Punjabi.

If you or your staff has any questions with respect to this information, please don't hesitate to contact Executive Director, Nikki Sieben at 250 952-6036.

Sincerely,

Lindsay Kislock  
Assistant Deputy Minister

pc: Nikki Sieben, Executive Director

Bette Jo Hughes, Assistant Deputy Minister & Government Chief Information Officer  
Kevena Bamford, Executive Director, Office of the Chief Information Officer  
xxxxx, Insurance Corporation of British Columbia

**OUT-OF-COUNTRY CLAIM**  
**(to be filled out by the beneficiary)**Return to: Medical Services Plan, Out-of-Country Claims  
PO Box 9480 Stn Prov Govt, Victoria BC V8W 9E7**IMPORTANT**

- This form must be completed and signed by the patient or their legal guardian
- Refer to Section D on the back before completing this form
- If you leave Canada specifically to obtain medical care, you must receive prior approval for payment of insured services – see Section D, Elective Services on page 4
- Claims must be received within 90 days of the date of service
- Attach all original receipts or bills to this form – include itemized statement
- Retain copies of bills or receipts for your records
- Receipts not in English must be translated before being submitted
- Form must be signed by patient or legal guardian

**SECTION A – PATIENT INFORMATION**

PATIENT LAST NAME		PATIENT FIRST NAME(S)		PERSONAL HEALTH NUMBER (PHN)	
BIRTHDATE (DD / MM / YYYY)		GENDER <input type="checkbox"/> MALE <input type="checkbox"/> FEMALE		HOME PHONE NUMBER	
				WORK PHONE NUMBER	
MAILING ADDRESS		CITY / TOWN		PROVINCE POSTAL CODE	
RESIDENTIAL ADDRESS (IF DIFFERENT FROM ABOVE)		CITY / TOWN		PROVINCE POSTAL CODE	
HAS PATIENT LIVED AT ABOVE ADDRESS FOR THE 6 MONTHS PRECEDING DEPARTURE FROM BC? <input type="checkbox"/> YES <input type="checkbox"/> NO IF NO, PROVIDE BELOW THE RESIDENTIAL ADDRESS(ES) WHERE PATIENT WAS LIVING					
PREVIOUS RESIDENTIAL ADDRESS 1		CITY / TOWN		PROVINCE	POSTAL CODE
PREVIOUS RESIDENTIAL ADDRESS 2		CITY / TOWN		PROVINCE	POSTAL CODE
NAME AND ADDRESS OF PRESENT OR LAST EMPLOYER IN BRITISH COLUMBIA				EMPLOYER OF <input type="checkbox"/> PATIENT <input type="checkbox"/> HEAD OF FAMILY	
NAME AND ADDRESS OF A PERSON (NOT A RELATIVE) WHO CAN CONFIRM PATIENT'S RESIDENCE IN BRITISH COLUMBIA (INCLUDE POSTAL CODE)					
REASON FOR ABSENCE FROM BRITISH COLUMBIA				MONTH DAY YEAR	
<input type="checkbox"/> VACATION <input type="checkbox"/> STUDENT				DATE OF DEPARTURE FROM BC	
<input type="checkbox"/> MOVED <input type="checkbox"/> BUSINESS TRIP					
<input type="checkbox"/> OBTAIN MEDICAL CARE <input type="checkbox"/> OTHER (SPECIFY):				DATE OF RETURN TO BC	
DO YOU HAVE EXTENDED HEALTH BENEFITS INSURANCE OR TRAVEL INSURANCE?		<input type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, NAME OF COMPANY	
ARE YOU OR ANY DEPENDENTS COVERED BY HEALTH INSURANCE IN ANOTHER COUNTRY?				POLICY NUMBER	
<input type="checkbox"/> YES <input type="checkbox"/> NO					

**If yes, attach statement of payment of claims****RELEASE OF INFORMATION**

I, the patient named above, hereby authorize Out-of-Country Claims, Medical Services Plan, to obtain information necessary for the processing of my claim from the Hospital and/or Doctor who provided care or in the event of an appeal on this case to provide the appeal board with the appropriate information in order for an informed decision to be made.

I also authorize Out-of-Country Claims, Medical Services Plan, to provide/obtain information to/from the above named travel insurance or extended health benefits company.

In addition, my signature below is my Application for Benefits under the *Hospital Insurance Act* of British Columbia (for in-patient hospital charges).

I certify that I am the person entitled to receive benefits and that all statements made by me are true and correct.

SIGNATURE OF PATIENT / LEGAL GUARDIAN	<b>If legal guardian, provide name and relationship to patient</b>	
	NAME OF LEGAL GUARDIAN	CONTACT PHONE NUMBER
DATE SIGNED	RELATIONSHIP TO PATIENT	

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**SECTION B – TO CLAIM FOR DOCTOR'S FEE COMPLETE THIS SECTION**

REASON FOR SEEKING MEDICAL ATTENTION (DIAGNOSIS)

TREATMENT / PROCEDURE

DURATION OF ANAESTHESIA

\_\_\_\_\_ HRS \_\_\_\_\_ MIN

OR

FROM \_\_\_\_\_ TO \_\_\_\_\_

LABORATORY TESTS

CHARGE

\$

SPECIFY EACH AREA X-RAYED

CHARGE

\$

**PHYSICIAN INFORMATION** (if more than 7 physicians, attach additional page)

<b>1</b>	DOCTOR'S NAME AND SPECIALTY				COUNTRY AND CURRENCY			HAVE YOU PAID THE ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO	
	WERE YOU REFERRED BY ANOTHER DOCTOR? IF YES, PROVIDE NAME AND ADDRESS <input type="checkbox"/> YES <input type="checkbox"/> NO								
	DATE OF VISIT:	MONTH	DAY	YEAR	TYPE OF VISIT <input type="checkbox"/> OFFICE <input type="checkbox"/> HOME <input type="checkbox"/> HOSPITAL	TIME OF VISIT <input type="checkbox"/> 8 AM - 6 PM <input type="checkbox"/> 6 PM - 11 PM <input type="checkbox"/> 11 PM - 8 AM			CHARGE \$
<b>2</b>	DOCTOR'S NAME AND SPECIALTY				COUNTRY AND CURRENCY			HAVE YOU PAID THE ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO	
	WERE YOU REFERRED BY ANOTHER DOCTOR? IF YES, PROVIDE NAME AND ADDRESS <input type="checkbox"/> YES <input type="checkbox"/> NO								
	DATE OF VISIT:	MONTH	DAY	YEAR	TYPE OF VISIT <input type="checkbox"/> OFFICE <input type="checkbox"/> HOME <input type="checkbox"/> HOSPITAL	TIME OF VISIT <input type="checkbox"/> 8 AM - 6 PM <input type="checkbox"/> 6 PM - 11 PM <input type="checkbox"/> 11 PM - 8 AM			CHARGE \$
<b>3</b>	DOCTOR'S NAME AND SPECIALTY				COUNTRY AND CURRENCY			HAVE YOU PAID THE ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO	
	WERE YOU REFERRED BY ANOTHER DOCTOR? IF YES, PROVIDE NAME AND ADDRESS <input type="checkbox"/> YES <input type="checkbox"/> NO								
	DATE OF VISIT:	MONTH	DAY	YEAR	TYPE OF VISIT <input type="checkbox"/> OFFICE <input type="checkbox"/> HOME <input type="checkbox"/> HOSPITAL	TIME OF VISIT <input type="checkbox"/> 8 AM - 6 PM <input type="checkbox"/> 6 PM - 11 PM <input type="checkbox"/> 11 PM - 8 AM			CHARGE \$
<b>4</b>	DOCTOR'S NAME AND SPECIALTY				COUNTRY AND CURRENCY			HAVE YOU PAID THE ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO	
	WERE YOU REFERRED BY ANOTHER DOCTOR? IF YES, PROVIDE NAME AND ADDRESS <input type="checkbox"/> YES <input type="checkbox"/> NO								
	DATE OF VISIT:	MONTH	DAY	YEAR	TYPE OF VISIT <input type="checkbox"/> OFFICE <input type="checkbox"/> HOME <input type="checkbox"/> HOSPITAL	TIME OF VISIT <input type="checkbox"/> 8 AM - 6 PM <input type="checkbox"/> 6 PM - 11 PM <input type="checkbox"/> 11 PM - 8 AM			CHARGE \$
<b>5</b>	DOCTOR'S NAME AND SPECIALTY				COUNTRY AND CURRENCY			HAVE YOU PAID THE ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO	
	WERE YOU REFERRED BY ANOTHER DOCTOR? IF YES, PROVIDE NAME AND ADDRESS <input type="checkbox"/> YES <input type="checkbox"/> NO								
	DATE OF VISIT:	MONTH	DAY	YEAR	TYPE OF VISIT <input type="checkbox"/> OFFICE <input type="checkbox"/> HOME <input type="checkbox"/> HOSPITAL	TIME OF VISIT <input type="checkbox"/> 8 AM - 6 PM <input type="checkbox"/> 6 PM - 11 PM <input type="checkbox"/> 11 PM - 8 AM			CHARGE \$
<b>6</b>	DOCTOR'S NAME AND SPECIALTY				COUNTRY AND CURRENCY			HAVE YOU PAID THE ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO	
	WERE YOU REFERRED BY ANOTHER DOCTOR? IF YES, PROVIDE NAME AND ADDRESS <input type="checkbox"/> YES <input type="checkbox"/> NO								
	DATE OF VISIT:	MONTH	DAY	YEAR	TYPE OF VISIT <input type="checkbox"/> OFFICE <input type="checkbox"/> HOME <input type="checkbox"/> HOSPITAL	TIME OF VISIT <input type="checkbox"/> 8 AM - 6 PM <input type="checkbox"/> 6 PM - 11 PM <input type="checkbox"/> 11 PM - 8 AM			CHARGE \$
<b>7</b>	DOCTOR'S NAME AND SPECIALTY				COUNTRY AND CURRENCY			HAVE YOU PAID THE ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO	
	WERE YOU REFERRED BY ANOTHER DOCTOR? IF YES, PROVIDE NAME AND ADDRESS <input type="checkbox"/> YES <input type="checkbox"/> NO								
	DATE OF VISIT:	MONTH	DAY	YEAR	TYPE OF VISIT <input type="checkbox"/> OFFICE <input type="checkbox"/> HOME <input type="checkbox"/> HOSPITAL	TIME OF VISIT <input type="checkbox"/> 8 AM - 6 PM <input type="checkbox"/> 6 PM - 11 PM <input type="checkbox"/> 11 PM - 8 AM			CHARGE \$

**SECTION C – TO CLAIM FOR IN-PATIENT HOSPITAL CHARGE COMPLETE THIS SECTION**

- In-patient hospital charges include registered bed patient, dialysis, and surgical day care.
- Entitlement for hospital benefits is dependent upon residency and it is therefore essential that Sections A and C be completed in the fullest possible detail.
- A separate application is required for each admission to hospital for which a claim is made.
- The information requested in this form refers specifically to the person hospitalized. In the case of a dependent child it is necessary to supply particulars of the residence of the head of family.
- If the condition of the person requiring admission to hospital does not permit him/her to apply on his/her own behalf, or if he/she is an underage dependent, this form should be completed by a member of the family or some other person having knowledge of the facts.

NAME OF HOSPITAL								
MAILING ADDRESS OF HOSPITAL, INCLUDING POSTAL CODE								
ADMITTING DIAGNOSIS (NATURE OF ILLNESS) AND TREATMENT PROVIDED DURING HOSPITALIZATION								
DATE OF ADMISSION:	MONTH	DAY	YEAR	DATE OF DISCHARGE:	MONTH	DAY	YEAR	HAVE YOU PAID THE HOSPITAL ACCOUNT? <input type="checkbox"/> YES <input type="checkbox"/> NO <i>If yes, enclose proof of payment</i>

**ACCIDENTAL INJURY** (If hospitalization was the result of an accidental injury, complete this section)

DATE OF ACCIDENT:	MONTH	DAY	YEAR	ACCIDENT LOCATION	
TYPE OF ACCIDENT <input type="checkbox"/> AUTOMOBILE - (YOU WERE): <input type="checkbox"/> DRIVER IN TWO/MULTI-CAR COLLISION <input type="checkbox"/> PASSENGER IN TWO/MULTI-CAR COLLISION <input type="checkbox"/> PEDESTRIAN STRUCK BY AUTOMOBILE <input type="checkbox"/> CYCLIST STRUCK BY AUTOMOBILE <input type="checkbox"/> DRIVER IN AUTOMOBILE SHOW <input type="checkbox"/> PASSENGER IN AUTOMOBILE SHOW  <input type="checkbox"/> OTHER TYPE OF ACCIDENT (SPECIFY):				DESCRIBE HOW THE ACCIDENT TOOK PLACE	
				WHO DO YOU THINK WAS RESPONSIBLE FOR THE ACCIDENT?	

**NAMES, ADDRESSES AND INSURANCE INFORMATION (IF KNOWN) OF OTHER DRIVERS/PERSONS INVOLVED IN ACCIDENT**

<b>1</b>	FULL NAME AND ADDRESS OF OTHER DRIVER / PERSON INVOLVED IN ACCIDENT	
	NAME AND ADDRESS OF OTHER DRIVER'S / PERSON'S INSURANCE COMPANY	POLICY NUMBER
<b>2</b>	FULL NAME AND ADDRESS OF OTHER DRIVER / PERSON INVOLVED IN ACCIDENT	
	NAME AND ADDRESS OF OTHER DRIVER'S / PERSON'S INSURANCE COMPANY	POLICY NUMBER
<b>3</b>	FULL NAME AND ADDRESS OF OTHER DRIVER / PERSON INVOLVED IN ACCIDENT	
	NAME AND ADDRESS OF OTHER DRIVER'S / PERSON'S INSURANCE COMPANY	POLICY NUMBER

## SECTION D - GENERAL INFORMATION

The Medical Services Plan (MSP) insures out of country medical services required on an emergency basis during a temporary absence and claims must be submitted **within 90 days** from the date of service.

The plan pays for medically required services by a qualified **Doctor (M.D.)** up to B.C. rates, any difference in fees is the patient's responsibility.

In-patient hospital benefits are provided to eligible British Columbia residents who are taken ill or are accidentally injured outside British Columbia.

Payment can be made directly to the doctor/hospital. The patient will be reimbursed if the account has been paid. In instances where there is a small amount payable or the facility/doctor does not accept Canadian currency, payment is made to the patient. The patient is responsible for payment of the account.

***Please allow 12-16 weeks for processing.***

### ELECTIVE SERVICES

If you wish to leave Canada specifically to obtain medical care, it is necessary for the BC attending specialist to write to MSP **BEFORE** you leave the province to request **prior approval** for payment of insured services. Please note that if approval is NOT received, all costs of such elective services will remain your responsibility. Travel costs and accommodation are not covered by MSP.

### MSP DOES NOT PROVIDE COVERAGE FOR THE FOLLOWING:

- services that are not deemed to be medically required, such as cosmetic surgery
- dental services, except as outlined below
- routine eye examinations for persons 19 to 64 years of age
- eyeglasses, hearing aids, and other equipment or appliances
- annual or routine examinations where there is no medical need
- services of counsellors or psychologists
- certified physician assistant
- registered nurse/nurse practitioner
- prosthesis and appliances
- nurse anaesthetist
- care in health spas and similar facilities
- transportation and accommodation expenses
- supplies and materials
- use of emergency room, private clinic/surgical facility fees
- medical care at the request of a third party
- medical examinations, certificates or tests required for:
  - driving a motor vehicle
  - immigration purposes
  - employment
  - school or university
  - life insurance
  - recreational/sporting activities

### MSP DOES NOT PROVIDE COVERAGE OUTSIDE THE PROVINCE FOR THE FOLLOWING:

- prescription drugs
- massage therapy
- naturopathy
- podiatry
- optometry
- ambulance service
- physical therapy
- chiropractic
- acupuncture

### DENTAL AND ORAL SURGICAL PROCEDURES

Dental and Oral surgical procedures are included as benefits **only** when medically required to be performed in a hospital where the insured person is admitted as an in-patient or as a patient under Day Care Surgical services.

### FOR FURTHER INFORMATION:

Health Insurance BC  
Medical Services Plan  
Out-of-Country Claims  
PO Box 9480 Stn Prov Govt  
Victoria BC V8W 9E7  
Web: [www.hibc.gov.bc.ca](http://www.hibc.gov.bc.ca)

Phone: 604 683-7151 Vancouver  
1 800 663-7100 Toll-free (other areas in BC)  
Fax: 250 405-3588

**BEFORE MAILING:** *Please ensure that all areas of the claim form are complete*  
*Attach all receipts or bills to this form – include itemized statements*  
*Ensure that you have signed all appropriate areas*

Overview

Use the Card

The Card for You

How to Get Your Card

Replace Your Card

Change Your Name or Address

See the Card

Verifying Identity with the Card

## BC Services Card

ID in B.C. is getting an upgrade. The new BC Services Card will provide secure access to provincial government services. **Starting February 15, 2013**, new cards will be issued with the goal of eventually replacing all existing CareCards.

### The BC Services Card.

Your CareCard, and more.

Welcome to [BCServicesCard.ca](#). Find out how you can use one card to access many services.

[READ AN OVERVIEW ABOUT THE CARD](#)

Find Out...

- Why there's a new card
- Why it's important to have ID
- How to get a card
- Ways to use the card

Information & Resources

- For new residents
- For businesses and health care service providers

Quick Links

- Change your name or address
- Replace your card

Find out which card is right for you image from traction to link to interactive tool will be here.

The BC Services Card.

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16



Overview
Use the Card
» The Card for You
» How to Get Your Card
» Replace Your Card
» Change Your Name or Address
» See the Card
» Verifying Identity with the Card

## Use the Card

Cards available starting February 15, 2013.

While you may use the card to access different services, your personal information is not transferred between those services. For example, a health care provider will not be able to see your driving record, while a police officer or ICBC employee will not have access to your health records.

### Health Care Services

Having a BC Services Card will prove your enrolment in the Medical Services Plan, which means that you're entitled to health care services. Over the next five years, every B.C. resident will re-enrol in MSP and replace their CareCard with the new BC Services Card.

- Find out how to get your card

### Card Expiry

Be sure to renew your card before the expiry date on your BC Services Card since it's now the 'key' you'll use to access various government services – most importantly, health care services.

- Renew your card

There are some cases where card renewal is not required:

- Newborns, children and youths under 19
- Older adults (75 and older)
- New residents with temporary immigration status

### Security Features

Security features built into the BC Services Card are designed to ensure that services are delivered to the right person and that only authorized service providers are given access to personal information. Security features include:

- a card expiry date
- anti-forgery features
- a security chip
- a photograph (for adults)

See some of the card's security features

### Collection of Personal Information Notification

Your personal information is never transferred between the services you access. In fact, the personal information you provide is strictly collected for:

- Enrolment in the Medical Services Plan
- Application for a BC Services Card and its authorized programs

ICBC collects personal information under the authority of section 26 (c) of the **Freedom of Information and Protection of Privacy Act** ("FIPPA"). Information may be disclosed pursuant to section 33 of FIPPA.

### Future Uses

In the future, you will be able to use the card to access other government services online or in-person.

Every BC Services Card will have a security chip embedded in it – similar to the ones used by credit cards in Canada. In the future, the chip technology will allow you to access a service by tapping your card on a card reader. It will recognize your unique chip and validate your identity to the service provider. It's important to note that the cards and the card readers do not store personal information and that access to your records is protected by a passcode, similar to the Personal Identification Number (PIN) used to access your bank card.

Continue to visit this website to learn about accessing more services using your BC Services Card.

### Related Links

Find out which card is right for you  
Learn why it's important to have ID

### Useful Contacts

Service BC  
(Victoria) 250-387-6121  
(Vancouver) 604-660-2421  
(Elsewhere in B.C.) 1-800-663-7867

If you would like more information about the BC Services Card, please contact:

If you have any questions about the collection and use of your personal information, please contact:  
Manager, Privacy & FOI Department  
151 W Esplanade  
North Vancouver, BC V7M 3H9  
Phone: 250-978-8300 or 1-800-950-1498

**From:** [Pearce, Alison HLTH:EX](#)  
**To:** ["Sarah Bolduc"; "Allison Ishida";](#)  
**cc:** [McLean, Sharon CITZ:EX; Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** BC Services Card - website and brochure - changes to Collection of PI Notification  
**Date:** Tuesday, December 11, 2012 5:13:16 PM

---

We have agreed on the contact "title, address and phone number" for the Collection of Personal Information Notification found on the brochure and on the bcservicescard.ca website.

This is how it should read (change 3rd para only):

Collection of Personal Information Notification:

If you have any questions about the collection and use of your personal information, please contact the Manager, Service Delivery at PO Box 9412 Stn Prov Government, Victoria, BC, V8W 9V1 or call 604-660-2421 (metro Vancouver), 250-387-6121 (Victoria) or 1-800-663-7876 (Elsewhere in BC).

(Allison – these phone numbers are identical to those in the Learn more: box above, if you need to direct people there and save space)

Thanks to you both,  
Alison

**From:** [Colbert, Lisette](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** FW: ICBC website feedback  
**Date:** Friday, November 30, 2012 1:23:31 PM

---

The privacy page on the home page of icbc.com is specific to how we manage privacy for the person accessing icbc.com – it's not specific to driver licensing. Look here for that;

<http://icbc.com/driver-licensing/your-privacy>

P.S. I'm not supposed to be contacting you about this stuff directly (that's a phone call to give you back-story) so please keep on QT.

---

**From:** Colbert, Lisette  
**Sent:** Friday, November 30, 2012 7:06 AM  
**To:** Thambirajah, Natasha HLTH:EX  
**Subject:** RE: ICBC website feedback

No worries Natasha. I'll check with our privacy department and get back to you.  
TGIF!!!!

.....  
**Lisette Colbert**

**Project Change & Communications Lead, BC Services Card Project**

**ICBC** building trust. driving confidence.

.....  
910 Government street  
Victoria | British Columbia | V8W 3Y8  
**direct:** 250-414-7875 |  
**facsimile:** 250-978-8014 | **mobile:** S22

---

**From:** Thambirajah, Natasha HLTH:EX [<mailto:Natasha.Thambirajah@gov.bc.ca>]  
**Sent:** Thursday, November 29, 2012 4:36 PM  
**To:** Colbert, Lisette  
**Subject:** ICBC website feedback

Hi Lisette,

I know we talked about getting feedback to you tomorrow, but our mtg with Nikki was bumped until Tuesday ... the earliest I could give you anything officially approved from my shop is end of day Tuesday. Is that ok?

Also had another thought ... the privacy language. Would ICBC consider having a reference to the BC Services Card on your privacy page?

<http://www.icbc.com/driver-licensing/your-privacy>

N

---

**Natasha Thambirajah**

Policy Advisor  
Strategic Projects Branch, Health Sector IM/IT Division  
Ministry of Health, Province of British Columbia  
T: (250) 952 7455 | F: (250) 952 6084

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**From:** [Walker, Lisa HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** FW: Version for OIPC  
**Date:** Friday, November 30, 2012 10:33:50 AM

---

FYI

Lisa Walker  
PROGRAM COORDINATOR  
Strategic Projects Branch  
Health Sector IM/IT Division  
Ministry of Health  
M 250.952-6036  
Fax: 250.952-6084  
[Lisa.Walker@gov.bc.ca](mailto:Lisa.Walker@gov.bc.ca)

-----Original Message-----

From: Schmidt, Tracee HLTH:EX  
Sent: Friday, November 30, 2012 10:29 AM  
To: Walker, Lisa HLTH:EX  
Subject: RE: Version for OIPC

Given the materials are not finalized, I would only send to her electronically as an FYI - we can send final .pdfs after sign off

-----Original Message-----

From: Walker, Lisa HLTH:EX  
Sent: Friday, November 30, 2012 9:49 AM  
To: Schmidt, Tracee HLTH:EX  
Subject: RE: Version for OIPC

She is working on it now...she is going to put one together for Kevena as well. Do we need to do a binder for Kevena of what was sent to commissioner yesterday?

Lisa Walker  
PROGRAM COORDINATOR  
Strategic Projects Branch  
Health Sector IM/IT Division  
Ministry of Health  
M 250.952-6036  
Fax: 250.952-6084  
[Lisa.Walker@gov.bc.ca](mailto:Lisa.Walker@gov.bc.ca)

-----Original Message-----

From: Schmidt, Tracee HLTH:EX  
Sent: Friday, November 30, 2012 8:25 AM  
To: Walker, Lisa HLTH:EX  
Subject: RE: Version for OIPC

natasha

-----Original Message-----

From: Walker, Lisa HLTH:EX  
Sent: Friday, November 30, 2012 7:58 AM  
To: Schmidt, Tracee HLTH:EX  
Subject: FW: Version for OIPC

Hi Tracee...would Michele have this as well?

Lisa Walker  
PROGRAM COORDINATOR  
Strategic Projects Branch  
Health Sector IM/IT Division  
Ministry of Health  
M 250.952-6036  
Fax: 250.952-6084  
Lisa.Walker@gov.bc.ca

-----Original Message-----

From: Bamford, Kevena CITZ:EX  
Sent: Thursday, November 29, 2012 4:30 PM  
To: Walker, Lisa HLTH:EX  
Subject: Re: Version for OIPC

Thank you.

Can you please get the list for the next comms binder? (directed mail and forms)?

On 2012-11-29, at 4:18 PM, "Walker, Lisa HLTH:EX" <Lisa.Walker@gov.bc.ca> wrote:

> Hi Kevena,  
>  
> Here is the binder contents of what we sent to Michael today.  
>

> Lisa Walker  
 > PROGRAM COORDINATOR  
 > Strategic Projects Branch  
 > Health Sector IM/IT Division  
 > Ministry of Health  
 > M 250.952-6036  
 > Fax: 250.952-6084  
 > Lisa.Walker@gov.bc.ca  
 >  
 >  
 > -----Original Message-----  
 > From: Robinson, Michele HLTH:EX  
 > Sent: Thursday, November 29, 2012 3:29 PM  
 > To: Walker, Lisa HLTH:EX  
 > Cc: Cleveland, Megan HLTH:EX; Schmidt, Tracee HLTH:EX  
 > Subject: RE: Version for OIPC  
 >  
 > Hi Lisa,  
 >  
 > Below is a list of the documents in the binder for the OIPC.  
 >  
 >  
 > Binder contents:  
 > 1. Stakeholder Kits - Approach Summary 2. General Letter 3. Questions  
 > and Answers for Health Stakeholders 4. BC Services Card ID fact sheet  
 > for health care providers 5. Card reader information sheet 6.  
 > Questions and Answers for Business Stakeholders 7. BC Services Card ID  
 > fact sheet for businesses 8. Prezi overview 9. Letter for colleges and  
 > associations 10. Letter for health care providers 11. Letter for group  
 > plan administrators (email) 12. Group Plan Administrators summary of  
 > changes and questions and answers 13. Letter for group plan  
 > administrators (mail) 14. Letter for group plan administrators - Armed  
 > Forces 15. Letter for businesses (from MoH) 16. Letter for businesses  
 > (Travel Assistance Program, from MoH) 17. Letter for businesses (from  
 > CITZ) 18. Letter for MLAs/MPs  
 >  
 >  
 >

**From:** [Pearce, Alison HLTH:EX](#)  
**To:** ["Tanya Howes";](#)  
**cc:** ["Bill Jubran\(C\)"; Thambirajah, Natasha HLTH:](#)  
[EX;](#)  
**Subject:** HIBC Privacy Contact  
**Date:** Thursday, December 6, 2012 5:02:00 PM

---

Tanya - Bill asked us to add HIBC's privacy contact position (eg. Privacy Manager), address and phone number to the [bcservicescard.ca](http://bcservicescard.ca) website at the same location as the personal information disclosure. Currently, we only have contact information for ICBC's privacy person. He said it is S22

Can you please send me her title, address and phone number?

Thanks,  
Alison



**From:** [Susan Prosser](#)  
**To:** [Pearce, Alison HLTH:EX;](#)  
**cc:** [Mynen, Mieke HLTH:EX;](#) [Thambirajah, Natasha HLTH:EX;](#)  
[Grady, Denise HLTH:EX;](#) [Mark Young;](#) [Pamela Atkinson;](#)  
**Subject:** Notification Letters and MSP Account Numbers  
**Date:** Wednesday, April 3, 2013 10:10:17 AM

---

Hi Alison,

Following up on our meeting yesterday, I confirmed with Mark Young at HIBC that it is current practice to change SIN based Account numbers at the client's request. There is currently no automated way to track requests, but a manual process could be put in place if required.

It should be noted, that this response could be used for individual complaints, but HIBC is not staffed to handle a higher volume of these calls than they currently handle if this were to be advertised. These calls are referred to the more highly trained, limited number of Enrolment Specialists and could have impact on SLRs if volume increases.

Let me know if you have any questions.

Susan Prosser, PMP  
Project Manager,  
Health Insurance BC  
MAXIMUS BC Health INC.  
Mobile 250-480-8913  
Desk 250-405-3840  
email:[Susan.Prosser@maximusbc.ca](mailto:Susan.Prosser@maximusbc.ca)

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**From:** [Pearce, Alison HLTH:EX](#)  
**To:** [Bamford, Kevena CITZ:EX](#);  
**cc:** [Sieben, Nikki HLTH:EX](#); [Schmidt, Tracee HLTH:EX](#);  
[Thambirajah, Natasha HLTH:EX](#); [McLean, Sharon CITZ:EX](#);  
[Hoel, Lynda M CITZ:EX](#);  
**Subject:** Re: Collection of Personal Information Notification  
**Date:** Monday, December 10, 2012 9:18:06 PM

---

Great, thank you, Kevena. The tri-fold will not be at ICBC, but likely all Service BC locations and all our health providers, BC Ferries and others? It is intended to be corporate.

Could I recommend on the tri-fold and [bcservicescard.ca](http://bcservicescard.ca) website (corporate), the contact title and address as per your e-mail below, but with the Service BC phone # as we have in the ICBC and HIBC (using their respective contact centre phone numbers) notifications. Then, we can let Services BC field the calls from brochure and website and advise them of you Manager of Service Delivery phone number if they need to escalate.

Alison

Sent from my iPad

On 2012-12-10, at 10:52 AM, "Bamford, Kevena CITZ:EX" <[Kevena.Bamford@gov.bc.ca](mailto:Kevena.Bamford@gov.bc.ca)> wrote:

Alison

Our thinking is :

<!--[if !supportLists]-->• <!--[endif]-->The **tri-fold brochure** should have ICBC contact information provided (as I understand its main purpose is to be used at ICBC counters)

<!--[if !supportLists]-->• <!--[endif]-->The **MSP/HIBC website** should have the HIBC contact information (or maybe Health staff member??) provided (as its on the Health website and is not corporate)

<!--[if !supportLists]-->• <!--[endif]-->The [BCservicescard.ca](http://BCservicescard.ca) website is corporate . We can provide the following name and contract information:

<!--[if !supportLists]-->○ <!--[endif]-->

>Manager, Service Delivery

<!--[if !supportLists]-->○ <!--[endif]-->PO Box  
9412 Stn Prov Government  
Victoria, BC V8W 9V1  
(Victoria) 250-356-7988

Hoping this helps resolve.

Kevena.

---

**From:** Pearce, Alison HLTH:EX  
**Sent:** Monday, December 10, 2012 10:09 AM  
**To:** Bamford, Kevena CITZ:EX; Sieben, Nikki HLTH:EX  
**Cc:** Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX;  
McLean, Sharon CITZ:EX  
**Subject:** RE: Collection of Personal Information Notification

Can do:

HIBC – MSP brochure (enrolment kit), Interactive Voice Response system (phone), Over 19 letter  
ICBC – Interim BC Services Card (x2 combined and photo), Notice to Renew (x2)  
Corporate – [bcservicescard.ca](http://bcservicescard.ca) website, tri-fold brochure, MSP/HIBC website

I am looking for a privacy contact for the “corporate pieces”. We currently have an e-mail address that the ICBC’s contact centre uses to forward privacy inquiries they cannot answer and need to escalate to CITZ (OCIO). Therefore, could we use a Service BC agent as the contact?

Alison

---

**From:** Bamford, Kevena CITZ:EX  
**Sent:** Monday, December 10, 2012 9:34 AM  
**To:** Sieben, Nikki HLTH:EX; Pearce, Alison HLTH:EX  
**Cc:** Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX;  
McLean, Sharon CITZ:EX

**Subject:** RE: Collection of Personal Information Notification

I need to talk with Jeannette and get guidance here. We will get back to you.

Alison – can you pls share a list of artifacts where the collection notice is provided. Thanks.

---

**From:** Sieben, Nikki HLTH:EX

**Sent:** Monday, December 10, 2012 9:23 AM

**To:** Pearce, Alison HLTH:EX; Bamford, Kevena CITZ:EX

**Cc:** Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX; McLean, Sharon CITZ:EX

**Subject:** RE: Collection of Personal Information Notification

Just weighing in, I suspect the most appropriate contact would be CITZ through the service BC line – who then can use the existing triage process to get to the right organization.

I do agree that many of the questions will be focused around FIPPA so would be relevant to send to CITZ.

Kevena, any major concerns?

---

**From:** Pearce, Alison HLTH:EX

**Sent:** Friday, December 7, 2012 11:16 AM

**To:** Bamford, Kevena CITZ:EX

**Cc:** Sieben, Nikki HLTH:EX; Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX; McLean, Sharon CITZ:EX

**Subject:** RE: Collection of Personal Information Notification

Brochure.

I think it is confusing to provide two contacts. ICBC clearly can respond to MVA authorities and HIBC can respond to MPA authorities. Who is left over to respond to FIPPA issues (one actually quoted in the notification?

You can definitely suggest to Sarah/Trinity to return to a discreet page on privacy.

---

**From:** Bamford, Kevena CITZ:EX

**Sent:** Friday, December 7, 2012 11:12 AM

**To:** Pearce, Alison HLTH:EX  
**Cc:** Sieben, Nikki HLTH:EX; Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX; McLean, Sharon CITZ:EX  
**Subject:** RE: Collection of Personal Information Notification

Pls advise what the corporate documents are...website and ???

I continue to express my interest in a special tab/location on the website for privacy related information. If I am a privacy advocate – I want to be able to quickly see where I can get this information as opposed to hunt/peck for it through an entire site. I am not opposed to it being sprinkled across the site where relevant, I just think it needs to be collated in 1 location.

With regards to the privacy contact – I think we should stay with the same model as with the notice and forms – include ICBC and HIBC's contact info (so its all consistent)– CITZ has provided a single contact mailbox/phone number for ICBC (HIBC too??) where they can pass calls on to us if beyond the scope of what authorities the info is collected under.

#### Thoughts?

**From:** Pearce, Alison HLTH:EX  
**Sent:** Friday, December 7, 2012 10:39 AM  
**To:** Bamford, Kevena CITZ:EX  
**Cc:** Sieben, Nikki HLTH:EX; Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX; McLean, Sharon CITZ:EX  
**Subject:** Collection of Personal Information Notification  
**Importance:** High

I have a problem needing solved this morning.

We have added the Collection of Personal Information Notification to the brochure. As advised by Charmaine, we end the disclosure with a title, address and phone number to contact for further information (see below as an example).

On others documents with the notification, we provided ICBC's privacy contact when it was an ICBC document for a photo card. When it was for a non-photo card document, we provided HIBC's privacy contact.

Now, on corporate documents – who should the privacy contact be?

Should it not be someone at CITZ as the PIISP and holder of the authoritative legislation?

I have been advised that the contact info'n can be for an agent at a particular call centre. Could we use Service BC?

This will also need to stand for the website. ICBC voiced concern that they were out there on their own.

Thanks,  
Alison

### **Collection of Personal Information Notification**

The personal information you provided was collected for the following purposes:

- <!--[if !supportLists]-->• <!--[endif]-->Enrolment in the Medical Services Plan (MSP), and
- <!--[if !supportLists]-->• <!--[endif]-->Application for a BC services Card and its authorized programs.

Personal information is collected under the authority of section 26 (c) of the Freedom of Information and Protection of Privacy Act (FIPPA). Information may be disclosed pursuant to section 33 of FIPPA.

If you have any questions about the collection and use of your personal information, please contact.....

**From:** [Pearce, Alison HLTH:EX](#)  
**To:** [McLean, Sharon CITZ:EX](#); [Bamford, Kevena CITZ:EX](#);  
**cc:** [Sieben, Nikki HLTH:EX](#); [Schmidt, Tracee HLTH:EX](#);  
[Thambirajah, Natasha HLTH:EX](#); [Hoel, Lynda M CITZ:EX](#);  
**Subject:** RE: Collection of Personal Information Notification  
**Date:** Tuesday, December 11, 2012 5:04:50 PM

---

Thank you, both. You just took us one step closer to getting everything done!

Alison

---

**From:** McLean, Sharon CITZ:EX  
**Sent:** Tuesday, December 11, 2012 4:28 PM  
**To:** Pearce, Alison HLTH:EX; Bamford, Kevena CITZ:EX  
**Cc:** Sieben, Nikki HLTH:EX; Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX; Hoel, Lynda M CITZ:EX  
**Subject:** RE: Collection of Personal Information Notification

Hi Alison,

We have discussed and agreed that your suggestion is the best way forward.

Please go ahead and add that information on the tri-fold brochure and the website.

Thanks

Sharon

---

**From:** Pearce, Alison HLTH:EX  
**Sent:** Monday, December 10, 2012 9:18 PM  
**To:** Bamford, Kevena CITZ:EX  
**Cc:** Sieben, Nikki HLTH:EX; Schmidt, Tracee HLTH:EX; Thambirajah, Natasha HLTH:EX; McLean, Sharon CITZ:EX; Hoel, Lynda M CITZ:EX  
**Subject:** Re: Collection of Personal Information Notification

Great, thank you, Kevena. The tri-fold will not be at ICBC, but likely all Service BC locations and all our health providers, BC Ferries and others? It is intended to be corporate.

Could I recommend on the tri-fold and [bcservicescard.ca](http://bcservicescard.ca) website (corporate), the contact title and address as per your e-mail below, but with the Service BC phone # as we have in the ICBC and HIBC (using their respective contact centre phone

**From:** [Sieben, Nikki HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** Re: comms materials to oipc  
**Date:** Friday, December 7, 2012 12:09:41 PM

---

Star

Sent from my iPhone

On 2012-12-07, at 11:35 AM, "Thambirajah, Natasha HLTH:EX" <[Natasha.Thambirajah@gov.bc.ca](mailto:Natasha.Thambirajah@gov.bc.ca)> wrote:

Confirmed: I personally handed the binder over to Joy's assistant this morning.

---

**From:** Sieben, Nikki HLTH:EX  
**Sent:** Friday, December 7, 2012 9:16 AM  
**To:** Pearce, Alison HLTH:EX; Thambirajah, Natasha HLTH:EX  
**Subject:** Fwd: comms materials to oipc

Did we send a binder to Joy?

Sent from my iPhone

Begin forwarded message:

**From:** "XT:Vanhelvoirt, Joy; ICBC CITZ:IN" <[Joy.VanHelvoirt@icbc.com](mailto:Joy.VanHelvoirt@icbc.com)>  
**Date:** 7 December, 2012 8:48:10 AM PST  
**To:** "Sieben, Nikki HLTH:EX" <[Nikki.Sieben@gov.bc.ca](mailto:Nikki.Sieben@gov.bc.ca)>  
**Cc:** "Ouellette, Glenda" <[Glenda.Ouellette@icbc.com](mailto:Glenda.Ouellette@icbc.com)>  
**Subject:** comms materials to oipc

Hi Nikki,

I know there was mention that there were binders prepared for the comms material that went to the OIPC for the partners. I have checked Kathy's stuff



and don't see anything....did ICBC get a binder and if so, do you know whom it went to? I just want to be prepared for next weeks meeting. Please let me know.

Thx  
Joy

.....  
**Joy Van Helvoirt**

**Manager, Provincial Driver Licensing Programs**  
Insurance and Driver Licensing Division

**ICBC** building trust. driving confidence.

.....  
2nd Floor | 910 Government Street  
Victoria | British Columbia | V8W 3Y8

**direct:** 250-414-7707

**facsimile:** 250-978-8007 | **mobile:** S22

---

.....  
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**From:** [Hallihan, Marj HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**cc:** [Hinton, Yasmeen HLTH:EX;](#)  
**Subject:** RE: Drafts of 2814: Collection of PI statement  
**Date:** Monday, June 24, 2013 4:51:10 PM

---

Thank you. Marj

---

**From:** Thambirajah, Natasha HLTH:EX  
**Sent:** Monday, June 24, 2013 4:45 PM  
**To:** Hallihan, Marj HLTH:EX  
**Cc:** Hinton, Yasmeen HLTH:EX  
**Subject:** RE: Drafts of 2814: Collection of PI statement

Hi Marj,

We are heartily in agreement. Please do proceed.

Thank you.

N

---

**From:** Hallihan, Marj HLTH:EX  
**Sent:** Monday, June 24, 2013 2:28 PM  
**To:** Thambirajah, Natasha HLTH:EX  
**Cc:** Hinton, Yasmeen HLTH:EX  
**Subject:** RE: Drafts of 2814: Collection of PI statement

Thanks Yasmeen

Hi Natasha,

I have been working with HIBC (Lisa) on the HLTH 2814 form and Lisa thought the BMO would like to review the privacy statement. As I mentioned in the email dated June 13<sup>th</sup>, the privacy statement for the purpose of claims processing and the privacy statement for the purpose of enrolment are not the same. The OOC form HLTH 2814 would use the claims privacy statement.

I assume the BMO is in agreement and we can proceed on the claim form. Thank you.

*Marj Hallihan*

Out of Country Advisor  
Medical Services Operations and Policy  
Ministry of Health  
3-1 1515 Blanshard St  
Victoria, BC V8W 3C8  
Phone: 250 952 1676  
Fax: 250 953 0422

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---

**From:** Hinton, Yasmeen HLTH:EX  
**Sent:** Monday, June 24, 2013 2:22 PM  
**To:** Hallihan, Marj HLTH:EX  
**Cc:** Thambirajah, Natasha HLTH:EX  
**Subject:** FW: Drafts of 2814: Collection of PI statement

Hi Marj! Over to you!!

**Yasmeen Hinton**

Manager, MSP Beneficiary Services Policy  
Ministry of Health  
Medical Services Branch  
Medical Services Operations and Policy  
(250) 952-3377

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---

**From:** Thambirajah, Natasha HLTH:EX

**Sent:** Monday, June 24, 2013 1:36 PM  
**To:** Hinton, Yasmeen HLTH:EX  
**Subject:** FW: Drafts of 2814: Collection of PI statement

Hi Yasmeen,

I'm thinking HIBC sent my office something that really belongs to you and your office – the decision making ability, that is.

It's true that my office directed HIBC to put the PI statement re. collection of information for BC Services Cards on most things related to it, but I really do not think we need our BC Services Card PI on this particular document as it is all about claims/insurance and has nothing to do with enrolling (first time), renewing enrolment or obtaining a BC Services Card.

Let me know what you think.

Regards,  
N

---

**From:** Lisa Lynam [<mailto:lisa.lynam@maximuscana.ca>]  
**Sent:** Friday, June 21, 2013 12:32 PM  
**To:** Pearce, Alison HLTH:EX  
**Cc:** Hallihan, Marj HLTH:EX; Thambirajah, Natasha HLTH:EX  
**Subject:** RE: Drafts of 2814: Collection of PI statement

Hi Alison,

Any further direction on this form? We have completed the revisions for everything else on this form and implementation is pending confirmation on the proper, acceptable PI statement by your office.

The pending form is attached. It contains the statement PI statement as follows which also represents the Hospital Insurance Act necessary for this form. Please advise if there is a change required for BC Services Card as was originally approved.

Personal information on this form is collected under the authority of the *Medicare Protection Act* and the *Hospital Insurance Act*. The information will be used to determine residency in BC and determine eligibility for provincial health care benefits. If you have any questions about the collection of this information, contact an MSP client representative at the address or telephone number shown in Section D of the form. Personal information is protected from unauthorized use and disclosure in accordance with the *Freedom of Information and Protection of Privacy Act* and may be disclosed only as provided by that Act.

Lisa Lynam  
Senior Communications Analyst  
[MAXIMUS BC Health Inc.](#)  
Phone: 250-405-3683

**From:** [Boulton, Michael HLTH:EX](#)  
**To:** [Schmidt, Tracee HLTH:EX](#); [Cleveland, Megan HLTH:EX](#);  
[Thambirajah, Natasha HLTH:EX](#);  
**cc:** [Pearce, Alison HLTH:EX](#); [Boden, Darren HLTH:EX](#); [Mitchell, Tamara HLTH:EX](#);  
**Subject:** RE: Focus group feedback  
**Date:** Thursday, November 29, 2012 3:58:48 PM

---

Tracee,

Tamara sent me a link to a number of items. The link is

S15

S15

I've printed each item and the cover sheet is the list of documents in the folder. I've left the package in your doorway slot.

Hope this is what is required.

Michael

-----Original Message-----

From: Schmidt, Tracee HLTH:EX  
Sent: Thursday, November 29, 2012 3:19 PM  
To: Cleveland, Megan HLTH:EX; Thambirajah, Natasha HLTH:EX;  
Boulton, Michael HLTH:EX  
Cc: Pearce, Alison HLTH:EX  
Subject: Focus group feedback

Can you pls pull together the focus group material into a package for the OIPC? Michael - can you (or Darren) help coordinate? Thx

Thanks

Tracee

**From:** [Pearce, Alison HLTH:EX](#)  
**To:** [Tanya Howes;](#)  
**cc:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** Re: HIBC Privacy Contact  
**Date:** Monday, December 10, 2012 9:09:12 PM

---

Thanks, Tanya. perfect.

Alison

Sent from my iPad

On 2012-12-10, at 9:47 AM, "Tanya Howes" <[tanya.howes@maximuscanada.ca](mailto:tanya.howes@maximuscanada.ca)> wrote:

Hi Alison,

Here you go. Let me know if you need anything else.

**From:** Pearce, Alison HLTH:EX [<mailto:Alison.Pearce@gov.bc.ca>]  
**Sent:** Thursday, December 06, 2012 05:01 PM  
**To:** Tanya Howes  
**Cc:** Bill Jubran(C); Natasha Thambirajah  
**Subject:** HIBC Privacy Contact

Tanya - Bill asked us to add HIBC's privacy contact position (eg. Privacy Manager), address and phone number to the [bcservicescard.ca](http://bcservicescard.ca) website at the same location as the personal information disclosure. Currently, we only have contact information for ICBC's privacy person. He said it is S22

Can you please send me her title, address and phone number?

Thanks,  
Alison

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<PrivacyChangesNov30 clean.doc>

**From:** [Colbert, Lisette](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** RE: ICBC website feedback  
**Date:** Friday, November 30, 2012 7:06:25 AM

---

No worries Natasha. I'll check with our privacy department and get back to you.  
TGIF!!!!

.....  
**Lisette Colbert**

**Project Change & Communications Lead, BC Services Card Project**

**ICBC** building trust. driving confidence.

.....  
910 Government street  
Victoria | British Columbia | V8W 3Y8  
**direct:** 250-414-7875 |  
**facsimile:** 250-978-8014 | **mobile** S22

---

**From:** Thambirajah, Natasha HLTH:EX [mailto:Natasha.Thambirajah@gov.bc.ca]  
**Sent:** Thursday, November 29, 2012 4:36 PM  
**To:** Colbert, Lisette  
**Subject:** ICBC website feedback

Hi Lisette,

I know we talked about getting feedback to you tomorrow, but our mtg with Nikki was bumped until Tuesday ... the earliest I could give you anything officially approved from my shop is end of day Tuesday. Is that ok?

Also had another thought ... the privacy language. Would ICBC consider having a reference to the BC Services Card on your privacy page?

<http://www.icbc.com/driver-licensing/your-privacy>

N

---

**Natasha Thambirajah**

Policy Advisor  
Strategic Projects Branch, Health Sector IM/IT Division  
Ministry of Health, Province of British Columbia  
T: (250) 952 7455 | F: (250) 952 6084

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**From:** [Tanya Howes](#)  
**To:** [Thambirajah, Natasha HLTH:EX](#); [Bill Jubran\(C\)](#); [Pearce, Alison HLTH:EX](#); [Li Rizzuto\(C\)](#); [Lisa Lynam](#); [Anne Mackay](#); [Mark Young](#); [Pamela Atkinson](#); [Anthony Forrest](#);  
**Subject:** RE: Personal Information Collection Disclosure  
**Date:** Thursday, November 29, 2012 4:01:59 PM

---

OOOPs! Yes!!!!!!

---

**From:** Thambirajah, Natasha HLTH:EX [mailto:Natasha.Thambirajah@gov.bc.ca]  
**Sent:** Thursday, November 29, 2012 4:01 PM  
**To:** Tanya Howes; Bill Jubran(C); Pearce, Alison HLTH:EX; Li Rizzuto(C); Lisa Lynam; Anne Mackay; Mark Young; Pamela Atkinson; Anthony Forrest  
**Subject:** RE: Personal Information Collection Disclosure

Hi Tanya,

Just to be sure, it's the *Medicare Protection Act* that you'll be citing, not the Medical Services Plan, right?

Thank you for the summary.

Regards,  
Natasha

---

**From:** Tanya Howes [mailto:tanya.howes@maximuscanada.ca]  
**Sent:** Thursday, November 29, 2012 3:53 PM  
**To:** Tanya Howes; Bill Jubran(C); Pearce, Alison HLTH:EX; Thambirajah, Natasha HLTH:EX; Li Rizzuto(C); Lisa Lynam; Anne Mackay; Mark Young; Pamela Atkinson; Anthony Forrest  
**Subject:** RE: Personal Information Collection Disclosure

Hi all,

Based on our meeting today with Alison and Natasha, please be advised of the following:

- the PI collection disclosure statement in the MSP brochure has been changed slightly and will include the **Medicare Protection Plan**. Li has these changes and will get a new proof done.
- once we approve the proof, we can go to print on the brochure
- a privacy insert will NOT be included in the enrolment kits as the insert is practically identical to the wording in the brochure
- we will include this PI collection disclosure statement on the bottom of the Age 19 form (back of Age 19 letter) but will wait for all the feedback from the SPB before

doing so

- we will include this PI collection disclosure statement in the template letters
- a privacy insert will NOT be sent with the:
  - notification letter
  - template letters
  - welcome letter

Also, please note that we are to go to print on the rack card.

Thanks everyone

---

**From:** Bill Jubran(C)

**Sent:** Thursday, November 29, 2012 3:05 PM

**To:** 'Pearce, Alison HLTH:EX'; Tanya Howes; Natasha Thambirajah

**Subject:** RE: Personal Information Collection Disclosure

On our way. Late in meeting with ICBC.

Sorry

---

Bill Jubran, Project Manager  
722 Cormorant St. Victoria BC V8W 3Z1 | Office (250) 405-3713 | Cell S22  
S22 | Fax (250) 405-3880

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-----Original Appointment-----

**From:** Pearce, Alison HLTH:EX [<mailto:Alison.Pearce@gov.bc.ca>]

**Sent:** Thursday, November 22, 2012 11:51 AM

**To:** Pearce, Alison HLTH:EX; Bill Jubran(C); Tanya Howes; Natasha Thambirajah

**Subject:** Personal Information Collection Disclosure

**When:** Thursday, November 29, 2012 3:00 PM-3:30 PM (GMT-08:00) Pacific Time (US & Canada).

**Where:** HLTH R BMO Meeting Room 5th Floor 1483 Douglas St HLTH:EX

When: Thursday, November 29, 2012 3:00 PM-3:30 PM (GMT-08:00) Pacific Time (US & Canada).

Where: HLTH R BMO Meeting Room 5th Floor 1483 Douglas St HLTH:EX

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

As a result of the meeting from this morning, let's look at whether we need to change the disclosure given that it is HIBC collecting and not HIBC.

If we have a draft of the disclosure "insert", we can look at it too.

Al ison

### **Collection of Personal Information Notification**

**The personal information you provided was collected for the following purposes:**

- **Enrolment in the Medical Services Plan (MSP); and,**
- **Application for a BC services Card and its authorized programs.**

**ICBC collects personal information under the authority of section 26 (c) of the *Freedom of Information and Protection of Privacy Act* (FIPPA). Information may be disclosed pursuant to section 33 of FIPPA.**

**If you have any questions about the collection and use of your personal information, please visit [icbc.com](http://icbc.com) or contact the Manager, Privacy & FOI department at 151 W Esplanade, North Vancouver, BC, V7M 3H9 or call 250-978-8300 or 1-800-950-1498.**

**From:** [Pamela Atkinson](#)  
**To:** [Pearce, Alison HLTH:EX](#); [Power, Stephanie A HLTH:EX](#);  
[Kirkpatrick, Dianne HLTH:EX](#); [Dunlop, Heather L HLTH:EX](#);  
[Redmond, Jackie M HLTH:EX](#);  
**cc:** [Sieben, Nikki HLTH:EX](#); [Susan Prosser](#); [Thambirajah, Natasha HLTH:EX](#);  
[Bill Jubran\(C\)](#);  
**Subject:** RE: Sending letters to Clients with PHN number  
**Date:** Monday, April 15, 2013 11:57:38 PM

---

Hi Alison,

Mark's e-mail raises a concern for HIBC in terms of circumstances for which they would need to invite someone back to the counter due to a problem on their card and whether HIBC is being notified of this. If there is a problem with a client's card, we need to know in the event that they contact HIBC.

Whether ICBC can include the PHN on an ICBC letter is an MoH decision, but I agree with your comment regarding the perception. There may be alternatives to the PHN (e.g. ICBC Client # ). From an HIBC perspective, we want to make sure that any new or revised letters referencing BC Services Card are reviewed as per the Operational Services Agreement to ensure we have an opportunity to provide feedback and assess any impacts. If the decision is made to include the PHN, we would want assurances that the PHN being printed on those letters is the correct PHN for the recipient of the letter.

Thanks.

Pam

---

**From:** Pearce, Alison HLTH:EX [mailto:[Alison.Pearce@gov.bc.ca](mailto:Alison.Pearce@gov.bc.ca)]  
**Sent:** Monday, April 15, 2013 5:21 PM  
**To:** Stephanie Power; MoHS - Dianne Kirkpatrick; Pamela Atkinson; Dunlop, Heather L HLTH:EX; Jackie Redmond  
**Cc:** Sieben, Nikki HLTH:EX; Susan Prosser; Natasha Thambirajah  
**Subject:** FW: Sending letters to Clients with PHN number

As per Mark's e-mail below, can ICBC include a person's PHN on a letter being sent by them to a standalone photo BC Services Card holder to invite them back to the counter due to a problem on their card?

I assume ICBC needs a way to identify the client (without a driver's licence number) in case they call their contact centre.

The downside is the perception that it is inappropriate that ICBC (a non-health

entity) is using the PHN to identify clients.

Alison

---

**From:** Hall, Mark [mailto:Mark.Hall@icbc.com]  
**Sent:** Monday, April 15, 2013 4:10 PM  
**To:** Pearce, Alison HLTH:EX  
**Subject:** Sending letters to Clients with PHN number

Hey Allison, one of the functions of our Licensing Unit is to send letters to Clients when we need a Client to come back in for a new card. There have been some diagnostic issues that require us to call a Standalone Photo holder back in. Our Privacy folks have advised us that we can put the PHN on the letter to the client to make it easier when they call in or show up at a DLO, however, they said that MoH has to OK us using the PHN in this fashion.

Can you let me know if MoH is Ok with this?

Thanks  
Mark

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**From:** [Sarah Bolduc](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** RE: Voicemail  
**Date:** Friday, November 30, 2012 12:53:55 PM  
**Attachments:** [BC Services Card - screen shots.docx](#)

---

Hi Natasha -

Here's screen shots of the landing page and the Use the Card page.  
Unfortunately, we don't have a 'pretty' shot of the landing page  
yet...waiting on some CMS things to get sorted as well as a new design file  
from Traction.  
Next week it'll look much prettier :)

sb

---

Sarah Bolduc  
UX Content Strategist  
e: S22

-----Original Message-----

From: Thambirajah, Natasha HLTH:EX [<mailto:Natasha.Thambirajah@gov.bc.ca>]  
Sent: November-30-12 11:53 AM  
To: 'Sarah Bolduc'  
Subject: RE: Voicemail

Thanks! It's a rush job, so if I can have them by 2 pm, that would be great.

-----Original Message-----

From: Sarah Bolduc S22  
Sent: Friday, November 30, 2012 11:08 AM  
To: Thambirajah, Natasha HLTH:EX  
Subject: Voicemail

Hi Natasha -

Just got your message. No problem to get you some screen shots. Away from my  
desk at the moment. Back soon...

Sent from my iPhone

## Appendix B PRIVACY IMPACT ASSESSMENT

### I BASIC INFORMATION – BC Services Card Program (Exchange IAS to HCIM)

#### 1. Ministry/Public Body and Program Area.

Ministry	Ministry of Citizens' Services and Open Government (CITZ) and Ministry of Health (MoH)
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Initiative Title	The BCSC Program – Identity Assurance Service (IAS) Integration with Provincial Health Client Registry (Enterprise Master Patient Index) Identity Management System (HCIM) System

**Comment [AM1]:** Up to you if you want to just say the EMPI or reference the Provincial Client Registry...both are really the same thing so up to you.

#### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA.)

Name, Title	Charmaine Lowe, Executive Director
Branch/Section	Knowledge and Information Services
Phone Number	250-356-2507
E-Mail	<a href="mailto:Charmaine.Lowe@gov.bc.ca">Charmaine.Lowe@gov.bc.ca</a>

**Comment [I2]:** NEW If this is also an MOH PIA whose name should be here...?Anita or ???  
Who at MOH will sign.

#### 3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.)

This Privacy Impact Assessment (PIA) should be read in conjunction with the accompanying BC Services Card (BCSC) Program PIAs.

Please refer to the Ministry of Health's Enterprise Master Patient Index (EMPI) PIA for a full discussion of the services provided through EMPI.

This PIA describes the details of the information exchanges between BC's Identity Assurance Services (IAS) and the Ministry of Health's Health Client Identity Management system (HCIM) system, also referred to as Health's the Enterprise Master Patient Index (EMPI).

**Insert general intro/overview to BCSC project...** IAS to EMPI brings credentialed identities into the Provincial Client Registry (EMPI) which will be accessed across the health sector.

There is one personal information exchange: the IAS will notify and provide to the HCIM-EMPI personal identity information about clients who have been issued a BC Services Card through Insurance Corporation of BC (ICBC) and Health Insurance BC (HIBC) registration processes. The information exchange is for the purpose of updating HCIM the EMPI of with the client information that is printed on the BC Services Card (which replaces the current BC Care-Card).

**Comment [I3]:** NEW: Which version

**Comment [I4]:** Are these one and the same...just checking! If they are the same, why the HCIM-that is BSCS specific isn't it...? maybe VSA PIA needs to explain in their PIA

**Comment [AM5]:** HCIM refers to the infrastructure and the Registry applications (the EMPI and the legacy client registry system) that comprise HCIM. This Healthcare Client Identity Management Solution is also referred to the Provincial Client Registry...the EMPI is the backend application/database. I think if we simply refer to the EMPI in the content of this appendix it makes more sense and better relates to the overall PIA itself.



This process is part of the ~~integrated~~ ~~Program~~ between ICBC, the ~~Ministry of Health~~ MoH and the Ministry of Citizens' Services and Open Government.

Please refer to the ~~BC Services Card Program~~ BCSC PIA for a full discussion of the program.

		*Yes	No
(a)	Does this PIA involve a common or integrated program/activity (as defined in the <del>FOIPP Act</del> FIPPA)?	X	
	and		
	Is the common or integrated program/activity confirmed by the written requirements set out in the regulation?	X	
(b)	Does this PIA involve a data-linking initiative (as defined in the <del>FOIPP Act</del> FIPPA)?		X

**Comment [16]:** Or PIAs as each partner has its own PIA? or do you mean just LCTZ's PIA? if so suggest add LCTZ

#### 4. Purpose/Objectives of the initiative (if statutory, provide citation).

- The ~~Provincial Health Client Registry~~ EMPI is the *single* source of truth for client identity information in the ~~H~~health ~~S~~sector.
- Health ~~P~~oints-of-~~S~~ervice (PoS) across the province rely on the EMPI for reliable and accurate client identity information; together with the client Personal Health Number (PHN) this information is recorded on all clinical encounters.
- ~~Without the integration of the Identity Assurance Service (IAS) with the EMPI, the~~ health sector will not have access to current client ~~card~~ identity data ~~without the integration of the IAS and EMPI.~~

**Comment [17]:** Maybe need to explain why this is not data linkage as it is outside of the health carve out...?is it because there is not a different purpose? Or doesn't meet the FIPPA definition?

**Comment [18]:** Isn't it just Client Registry? That is what all the other EMPI PIAs have

**Comment [AM9]:** Does get confusing so just use EMPI.

**Comment [TD10]:** Clarify what this means.

#### 5. What are the potential impacts of this proposal? (Include privacy impacts in this description.)

Please refer to the ~~LCTZ's BC Services Card~~ BCSC PIA for a full description of the potential impacts of the ~~BC Services Card~~ BCSC ~~P~~rogram.

**Comment [111]:** Suggest attach and reference this PIA in the appendix This EMPI PIA will be an appendix to the MOH PIA and to the LCTZ PIA

#### 6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).

~~Reference all other BCSC PIAs and~~ EMPI General PIA...

**Comment [112]:** NEW Tristan, the more I am thinking about this , it would be easier to leave the other EMPI PIAs out as they are more operational outside of the BCSC itself ie EMR-EHR etc The other PIAs will be BCSC MOH and BCSC LCTZ PIAs

## II DESCRIPTIVE INFORMATION

### 1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.

*{(See note above about the definition of personal information.)}*

*For example: Name, home address, gender, ~~age/birthdate~~date of birth, ~~SIN, Employee#~~, race/national, ethnic origin etc.*

The identity information will be communicated for one client at a time. The data elements that are included in the message are provided in the following table.

Table 1: Data Elements

Data Element Name	Description
Health Directed Identifier (HDID)	A unique persistent directed identifier for use between <del>the HCIM-EMPI</del> and IAS, that maps an individual with a PHN ( <del>s</del> See discussion below).
Secure PHN (SPHN)	An encrypted version of <del>the an</del> individual's <del>Personal Health Number (PHN)</del> .
Surname	The client's documented surname recorded from valid identity documentation during the client's identity registration and identity proofing event.
Given Name	The client's documented given name recorded from valid identity documentation during the client's identity registration and identity proofing event.
Date of Birth	The client's documented date of birth recorded from valid identity documentation during the client's identity registration and identity proofing event.
Sex	The client's documented sex recorded from valid identity documentation during the client's identity registration and identity proofing event.
Identification Level	An IAS-specific indicator to distinguish the level of confidence in the certainty of the identity according to the BC <del>OGIO</del> Office of the Chief Information Officer Evidence of Identity Standard. (A combo or photo card is associated with identification level 3, and a non-photo is associated with identification level 1.)
Address	The client's <del>documented</del> address recorded from <del>the client</del> valid identity documentation during the client's identity registration and identity proofing event.
Effective Date	The date on which the individual was registered or renewed to receive a <del>BC Services Card</del> BCSC.

No photo or card data (serial number, expiry date, etc) will be sent from ~~the IAS~~ to ~~EMPI~~HCIM.

**Comment [113]:** Need a complete list of what not sent-need to add appendix of other PIA with the data elements?

The IAS sends client identity data to the EMPI~~HCIM~~ and for every file sent by the IAS, ~~HCIM~~-the EMPI sends response to the IAS confirming a successful update or in exceptional circumstances (such as identity discrepancies or PHN not found) ~~HCIM~~-the EMPI sends a response to the IAS indicating an unsuccessful update, the IAS remains unchanged and ~~HCIM~~-EMPI Registry Administrators determine how to resolve.

S15

2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.

BC Services Card - Photo Card

The ~~BC Services Card Program~~BCSC PIA evaluates steps 1-6. This PIA focuses on steps 7 and 8. For a full discussion of the EMPI system and privacy controls please see the ~~Ministry of Health~~MoH's EMPI PIA.

1. Individual presents personal demographics and ~~identity~~ proof of identity information at the ICBC counter;
2. HIBC provides card qualification services to ICBC;
3. HIBC confirms or establishes a PHN for the applicant and provides to ICBC;
4. Card information is forwarded from ICBC proofing systems to card production;
5. Client demographics, card information, card serial number, and encrypted PHN are sent to IAS from ICBC;
6. Card sent to client;

7

S15

8. EMPI posts credentialed demographics to legacy Client Registry System.

BC Services Card – Non-Photo card

The ~~BC Services Card Program~~BCSC PIA evaluates steps 1-6. This PIA focuses on steps 7 and 8. For a full discussion of the EMPI system and privacy controls please see the ~~Ministry of Health~~MoH's EMPI PIA.

1. Individual submits personal demographics, ~~identity proofing~~proof of identity (i.e. photocopies and reference number) and ~~identity proofing~~reference number along with MSP application to HIBC;
2. HIBC confirms or establishes a PHN for the applicant;
3. HIBC releases a request for non-photo ~~BC Services Card~~BCSC to ICBC, providing PHN, identity proofing reference number and information to appear on card;
4. Demographic and card information is forwarded from ICBC proofing systems to card production;
5. Client demographics, card information, card serial number, and encrypted PHN are sent to the IAS from ICBC;
6. Card sent to client;

7.

S15

8. EMPI posts credentialed demographics to legacy Client Registry System.

Comment [I17]: What does this mean?

Comment [AM18]: Reworded.

Comment [I19]: What does the highlight mean? Or CR?

Comment [AM20]: The CRS is our legacy Client Registry. The EMPI and CRS are kept in sync...one day we will retire the CRS.

Comment [I21]: This is the PIA Anita is doing....

Comment [I22]: What does this mean?

Comment [AM23]: Reworded.

## Significant Principles

- All IAS identities will be recorded as “credentialed” identities in the EMPI, regardless of assurance level; identity information reported to the EMPI by other health ~~points of services~~PoS will be recorded as “declared” identities;
- Declared identity information updates will be accepted from multiple sources by the EMPI, as per current practice; this will not affect documented identities; and
- 

S15

**Comment [I24]:** What sources? The need to be listed

**Comment [AM25]:** The sources are all other Health care points of service. Rather than listing all the sources can we just say...health care points of service?  
LIZ-ok with me

**Comment [I26]:** This needs more explanation...  
**This whole bullet needs explaining!**

### III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act/FIPPA")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act/FIPPA have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?			
HCIM-EMPI (MoH) from IAS (CITZ)	X		
IAS (CITZ) from EMPI (MOH)			

**Comment [127]:** LIZ NEW: this PIA is from LCTZ's point of view of or MoH's? If it is an appendix to both don't both sides need to be represented or ?

**Comment [128]:** This is a 2 way flow, right?

IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)

#### 1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act/FIPPA?		X	
	If yes, please specify the name of the Act and relevant section:			
(b)	Is the personal information being collected for law enforcement purposes?		X	
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
	If yes, please specify the prescribed purpose:-:			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection? and			X
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?			X
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?		X	

**Comment [129]:** I don't think this is in the original notifications for collection documents, so keep as is..?

s. 26		Yes	No	n/a
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public? <b>Please identify event:</b>		X	
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or		X	
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

**Comment [130]:** Isnt IAS collecting as the PIISP?? ie a yes?? See later disclosure sections...

If none of the above questions has been answered "yes", your office does not have the authority under the **FOIPP Act/FIPPA** to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

## 2) How will the personal information be collected?

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?		X	

**IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO 3. NOTIFICATION TO COLLECT INFORMATION.**

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

s. 27(1)		Yes	No	n/a
(a)(i)	Did the individual the information is about authorize another method of collection?		X	
(a)(ii)	Has indirect collection been authorized by the Information and Privacy Commissioner?		X	

s. 27(1)		Yes	No	n/a
(a)(iii)	Has indirect collection been authorized by another enactment?		X	
	<b>If yes, please specify the name of the Act and relevant section(s):</b>			
(a.1)(i)	Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?		X	
(a.1)(ii)	Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?		X	
(b)	Is the public body collecting personal information disclosed to it by another public body under an authority within sections 33 to 36 of the <del>FOIPPA</del> <b>Act</b> <del>FIPPA</del> ?	X		
	<b>Specify relevant section(s) or subsections that apply:-</b> <del>FOIPPA</del> s. 33.2(d) and s.33.1(5)			
(c)(i)	Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?		X	
(c)(ii)	Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?		X	
(c)(iii)	Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?		X	
(c)(iv)	Is the personal information being collected for the purpose of law enforcement?		X	
(c)(v)	Is the personal information being collected to reduce the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(d)	Is the personal information being transferred to the public body from another public body in accordance with section 27.1?		X	
(e)	Is the personal information being collected necessary for delivering a common or integrated program or activity?		X	
tt(f)	Is the personal information about an employee, other than a service provider, and the collection of the information is necessary for the purposes of managing or terminating an employment relationship between a public body and the employee?		X	
(g)	Is the <del>information</del> personal identity information that is collected by the designated provincial identity information service that is necessary to provide services under section 69.2?		X	

Comment [I31]: Isn't this a yes?



s. 27(1)		Yes	No	n/a
	Additional details as required (e.g., explanation of method of collection):			

*If none of the above authorities have been checked, your office does not have the authority under the ~~FOIPP Act~~FIPPA to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.*

### 3) Notification to collect information

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

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27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?		X	
	(b) the legal authority for collection?		X	
	(c) the contact information of the person who can answer questions regarding the collection?		X	
	Additional details as required (e.g., method of notification):			

Notification is not required if the answer is “yes” to any of the following:

27(3)		Yes	No	n/a
(a)	Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the <del>FOIPP Act</del> FIPPA?		X	
(b)	Has the Minister responsible for the <del>FOIPP Act</del> FIPPA excused your public body from complying because it would:			
	(a) result in the collection of inaccurate information?		X	
	or			
	(b) defeat the purpose or prejudice the use for which the personal information is collected?		X	

27(3)		Yes	No	n/a
(c)	<p>The information:</p> <p>(a) is not required, under subsection 27(1), to be collected directly from the individual the information is about,</p> <p><b>and</b></p> <p>(b) is not collected directly from the individual the information is about.</p>	X		
(d)	<p>Is the information collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appears and that is open to the public.</p> <p><b>Please identify event:</b></p>		X	
27 (4)	<p>Is it reasonable to expect that notifying an employee of collection under subsection 27 (1) (f) would compromise</p> <p>(a) the availability or accuracy of the information, or</p> <p>(b) an investigation or a proceeding related to the employment of the employee?</p>		X	
<b>Additional details as required:</b>				

***If you have not provided the required notification as outlined above, please contact Knowledge and Information Services.***

#### IV USE OF PERSONAL INFORMATION - (Section 32 of the ~~FOIPP Act~~FIPPA)

	Yes	No	n/a
Is personal information being used?	X		

IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO [V. DISCLOSURE OF PERSONAL INFORMATION](#)

*Under the ~~FOIPP Act~~FIPPA, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?	X		
	Specify subsection(s) being applied: FOIPPA s. 33.2(d) and s.33.1(5)			

*If you have not checked one of the above, you do not have the authority to use the information. If you have any questions or require clarification please contact Knowledge and Information Services.*

V

**DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, ~~section 33.1~~, ~~section 33.2~~, ~~section 33.3~~, ~~section 34~~, ~~section 35~~ and ~~section 36~~ of the ~~FOIPPA~~ ~~Act~~ ~~FIPPA~~.)

	Yes	No	n/a
Is personal information being disclosed?	X		
IAS (CITZ) to HCIM-EMPI (MoH)			

Comment [I32]: 2 way??

**IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO  
VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION.**

*A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the ~~FOIPPA~~ ~~Act~~ ~~FIPPA~~.*

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the ~~FOIPPA~~ ~~Act~~ ~~FIPPA~~ provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

**Please choose the main authorization(s) for disclosure below. All authorities that may apply do not need to be checked, only the main authorizations for the initiative.**

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j): 22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if:			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable. (Note: Supporting documentation must be on file.)		X	
(1)(c)	In accordance with an enactment of British Columbia (other than the <del>Freedom of Information and Protection of Privacy Act/FIPPA</del> ) or Canada that authorizes or requires its disclosure.		X	
Specify name of enactment and relevant section(s):				
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <del>Freedom of Information and Protection of Privacy Act/FIPPA</del> ) that authorizes or requires the information to be made public.		X	
Specify name of enactment and relevant section(s):				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that: (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia (other than the <del>Freedom of Information and Protection of Privacy Act/FIPPA</del> ) or Canada.		X	
Specify name of enactment and relevant section(s):				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
	and (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada.			
If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i> :				

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body,			
	<b>and</b> (ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada.		X	
	<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i>:</b>			
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister.		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body.		X	
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act.		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<b>and</b> (ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that		X	
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of:			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	

<b>s. 33.1</b>	<b>Disclosure inside OR outside Canada</b>	<b>Yes</b>	<b>No</b>	<b>n/a</b>
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment.		X	
<b>(1)(j)</b>	(i) Repealed.			X
<b>(1)(k)</b>	For the purposes of:			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences.		X	
<b>(1)(l)</b>	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations.		X	
<b>(1)(m)</b>	If (i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and (ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety.		X	
<b>(1)(m.1)</b>	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur.		X	
<b>(1)(n)</b>	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted.		X	
<b>(1)(o)</b>	In accordance with section 36 (disclosure for archival or historical purposes).		X	

(1)(p)	The disclosure, (i) is necessary for,			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body.		X	
	<b>and</b> (ii) in the case of disclosure outside Canada, (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred.			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i>:</b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. <b>Please identify event:</b>		X	
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, <b>and</b>		X	
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required:</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	



(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information.		X	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33.			
(2)(a)	To another law enforcement agency in Canada.		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.		X	
(4)	In addition to the authority under any other provision of this section or section 33.2, the <del>Insurance Corporation of British Columbia</del> CBC may disclose personal information if, <ul style="list-style-type: none"> <li>(a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and</li> <li>(b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.</li> </ul>		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6).	X		
(7)	To respond to citizens' enquiries as permitted under section 33.1(7).		X	
<b>Additional details as required:</b>				

s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(a)	For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34).		X	
	<b>Please provide details of the original purpose for which the personal information was obtained or compiled—1 (include, if applicable, details of the consistent/secondary use):</b>			
(b)	Repealed.			X
(c)	To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister.		X	

s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(d)	To an officer or employee of: (i) a public body, or (ii) an agency, or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed.	X		
(e)	To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister.		X	
(f)	To the auditor general or any other prescribed person or body for audit purposes.		X	
(g)	To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem.		X	
(h)	To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry.		X	
(i)	To a public body or a law enforcement agency in Canada to assist in a specific investigation.			
	(i) undertaken with a view to a law enforcement proceeding, or		X	
	(ii) from which a law enforcement proceeding is likely to result.		X	
(j)	To the archives of the government of British Columbia or the archives of a public body, for archival purposes.		X	
(k)	Repealed.		X	
(l)	To an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body.		X	
	<b>Additional details as required:</b>			

s. 33.3	Disclosure to Public Without Request	Yes	No	n/a
(1)	Do the records fall within a category established under section 71 (1)?		X	
	<b>Additional details as required:</b>			
(2)	Do the records fall within a category established under section 71.1 (1)?		X	

s. 33.3	Disclosure to Public Without Request	Yes	No	n/a
	Additional details as required:			

2) **Systematic or Repetitious Disclosure/Exchanges?**

		Yes	No	n/a
i.	Do the disclosures of personal information under section 33.2 occur on a regular basis?	X		
ii.	Has an Information Sharing Agreement been completed for these disclosures/exchanges?	X		
iii.	Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ?			

**Comment [I33]:** Need to add COIP agreement?

Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.

3) **Research or Statistical Purposes (Section 35)**

	Yes	No	n/a
Has a researcher requested access to personal information in an identifiable form for research purposes?		X	

If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact Knowledge and Information Services for assistance.

*Please note: Research using personal information may only be conducted if it meets all of the terms of section 35.*

#### 4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below:

		Yes	No	n/a
(a)	The disclosure would not be an unreasonable invasion of personal privacy under section 22.		X	
(b)	The disclosure is for historical research and is in accordance with section 35 (research agreements).		X	
(c)	The information is about someone who has been dead for 20 or more years.		X	
(d)	The information is in a record that has been in existence for 100 or more years.		X	

***If you have not answered “yes” to any of the above authorizations for disclosure you do not have the authority to disclose personal information. If you have any questions or require clarification, please contact Knowledge and Information Services.***

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
(Section 28 and section 29 of the **FOI/PP Act/FIPPA**)

If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information (if requested), including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	...		
	Contact person:	...		
	Phone number:	...		
<b>Additional details as required:</b>				

**Comment [JV34]:** This will reference MoH/EMPI procedures for correction

*If any of the questions above have been answered "no", please contact Knowledge and Information Services for further clarification.*

## VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the ~~FQIPP Act~~FIPPA)

*Note: For PIAs related to new or existing systems, this section should be completed by the ~~B~~branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the [Signatures](#) section.*

*For PIAs that do not involve systems initiatives, this section should be completed by the program area completing the PIA. In this case, the signature of the systems representative is not required.*

Section 30 of the ~~Act~~FIPPA requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

This security section looks at the data transmission between the IAS and EMPI – for a full review of the security of each system please refer to the Security Threat and Risk Assessment for each system.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?  The data transmission shall be encrypted- and <del>The data transmission shall</del> require mutually authenticated nodes.  It is expected that ICBC will send 5,000-10,000 records per day around 1am, and the IAS will process immediately. The IAS will send messages to <del>HCIM</del> the EMPI as records are processed. Processing should be done before business hours resume in the morning.	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		X
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:			
	Contact person:			
	Phone number:			
Additional details as required:				
4.	Have user access profiles been assigned on a need-to-know basis?			X

Comment [I35]: Why is this NA?

5.	Do controls and procedures exist for the authority to add, change or delete personal information?			X
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?			X
Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances:				
7.	Does the audit identify inappropriate accesses to the system?			X
Additional details:				

Comment [I36]: Why are these NA

Comment [I37]: Why are these NA

Comment [I38]: Why are these NA

*If any of the questions above have been answered "no", please contact your Ministry's Security Officer. If you have any questions or require clarification please contact Knowledge and Information Services.*

**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION**  
cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

		Yes	No	n/a
	Will the information be stored or accessed only in Canada?	X		

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

		Yes	No	n/a
(a)	Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?		X	
	<b>Please explain:</b>			
(b)	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act/FIPPA</i> ?		X	
	<b>Please explain:</b>			
(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
	<b>Please explain:</b>			

*If you have not answered "yes" to any of the above authorizations, for storage or access of personal information outside Canada, or if you require clarification, please contact Knowledge and Information Services.*



## VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the ~~FOIPPA~~FIPPA)

**If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?	X		

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your Records Officer.***

*Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the Document Disposal Act. Please consult with your Records Officer to initiate the records scheduling process.*

**Comments:**

## X SIGNATURES

### PUBLIC BODY APPROVAL:

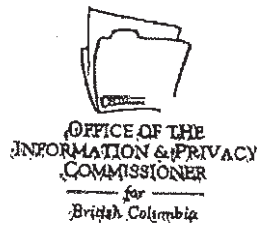
<u>&lt;&lt;Insert Name&gt;&gt;, Program Manager</u>	<u>Signature</u>	<u>Date</u>
---	------------------	-------------

<u>&lt;&lt;Insert Name&gt;&gt;, Ministry Contact Responsible for Systems Maintenance and Security</u>	<u>Signature</u>	<u>Date</u>
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<u>&lt;&lt;Insert Name&gt;&gt;, Knowledge and Information Services Office of the Chief Information Officer Ministry of Citizens' Services, and Open Government</u>	<u>Signature</u>	<u>Date</u>
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<u>&lt;&lt;Insert Name&gt;&gt;, Assistant Deputy Minister (or equivalent)</u>	<u>Signature</u>	<u>Date</u>
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**GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA and/or ISA summary)**



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<b>To:</b> Karen Ayers Associate Deputy Minister and General Manager, Liquor Control and Licensing Branch Ministry of Housing and Social Development	<b>From:</b> David Loukidelis Information and Privacy Commissioner for British Columbia
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**Fax:** (250) 387-9184

**Fax:** (250) 387-1696

**Tel:**

**Tel:** (250) 387-5629

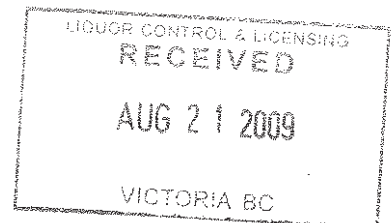
**Date:** August 21, 2009

**Pages:** 2 (including cover page)

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**Comments:**

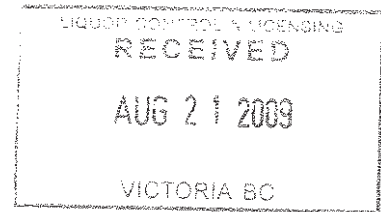
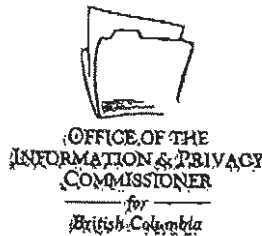
Attached please find a press release from the Office of the Information and Privacy Commissioner that will be issued today.



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*This fax is for the use of the above recipient only and must not be distributed, disclosed, used or copied by or to anyone else. This fax may be confidential, privileged and/or subject to the Freedom of Information and Protection of Privacy Act. If you receive this in error, please contact us by email at [info@oipc.bc.ca](mailto:info@oipc.bc.ca). You can also call us at (250) 387-5629. Thank you.*

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**August 21, 2009  
FOR IMMEDIATE RELEASE**

**PRIVACY COMMISSIONER & TREOSCOPE ANNOUNCE SOLUTION FOR ID  
SCANNING BY BARS**

**Victoria**—BC's privacy commissioner and TreoScope Technologies Inc. of Vancouver have found a way to allow BC's bars and nightclubs to identify and exclude customers banned for safety reasons. "We're very happy with this outcome", said Owen Cameron, TreoScope's President, adding, "We believe this solution will enable bars to identify the bad actors and keep them out." TreoScope's EnterSafe system enables bars with safety problems to collect information from driver's licences and BC ID cards in order to identify undesirable individuals and exclude them ([www.treoscope.com](http://www.treoscope.com)).

In a July decision under BC's *Personal Information Protection Act*, Information and Privacy Commissioner David Loukidelis had ruled that a Vancouver nightclub was collecting too much personal information of all customers and retaining it for too long. The Commissioner's decision expressly acknowledged, however, that it would be reasonable for a bar, in order to preserve a safe environment for customers, to identify individuals who are violent or otherwise undesirable for re-entry from a safety perspective. For this reason, Loukidelis's ruling "strongly encouraged" stakeholders to work with his office to find a way to achieve this customer safety goal.

TreoScope approached Loukidelis's office and, after collaborative discussions between them, a solution was arrived at:

- EnterSafe can now be used to collect only the name, photograph, date of birth and gender of customers who enter a bar, but that information can be retained for no more than a transitory 24-hour working period. After that, customer information is completely destroyed.
- However, if a customer is determined within the transitory 24-hour working period to be violent or otherwise undesirable from a safety perspective, that customer's name, photograph, date of birth and gender can be kept, and shared with other bars using EnterSafe, for customer safety purposes.

Commenting on the new approach, Loukidelis said, "This means only information necessary to identify the bad apples will be kept and that's good for all other bar customers." He also added, "I appreciate TreoScope's co-operation in working to find a privacy-compliant solution that also aims to serve customer safety."

-30-

**Contacts:**

OIPC—Sue Grimm 250 387 0777

TreoScope—Owen Cameron 604 688 1235

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Mailing Address: PO Box 9038, Stn Prov Govt, Victoria B.C. V8W 9A4

Location: Third Floor, 756 Fort Street

T: 250 387 5629 F: 250 387 1698

Toll Free enquiries through *Enquiry BC* at 1-800-663-7867 or 660-2421 (Vancouver)

W: [www.oipc.bc.ca](http://www.oipc.bc.ca)

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HTH-2013-00170 (PHASE 2)

**From:** [Francis, Celia CITZ:EX](#)  
**To:** [CITZ CIO KIS;](#)  
**Subject:** Commissioner"s recent speech  
**Date:** Friday, January 20, 2012 9:14:28 AM

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[http://www.oipc.bc.ca/pdfs/Speeches/  
ExecutiveDirectorsRegistrars\(17Jan2012\).pdf](http://www.oipc.bc.ca/pdfs/Speeches/ExecutiveDirectorsRegistrars(17Jan2012).pdf)

The Commissioner spoke at a recent event and mentioned, among other things (social media background checks, cloud computing and lawful access), BC's open data initiative with approval.

She also touched on the recent FOIPPA amendments, particularly the new data linking and PIA requirements and the social media provisions.

She also said that her office is developing guidelines for public bodies on PIAs and cloud computing.

*Celia Francis*

Director, IM/IT Legislation  
Knowledge and Information Services  
Office of the Chief Information Officer  
Ministry of Labour, Citizens' Services  
and Open Government  
Office. 250-356-7787 Mobile. 250-217-8469  
[www.cio.gov.bc.ca](http://www.cio.gov.bc.ca)

**From:** [Pearce, Alison HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** Disclosure  
**Date:** Monday, July 23, 2012 8:07:09 AM

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Natasha – can you coral the disclosure issue on the application for the BC Services Card presented by ICBC last week?

I have seen the one proposed by ICBC, one from Liz Keay, one from Bill and one that is on our MSP enrolment forms currently. I'm not sure if I have seen one from Charmaine or not.

Could you please list all the statements that we have gathered to date and we'll have a meeting to go through them all this week?

I think we possibly could use one on the application for just BC Services card and a different one on the application for the combo card (would incl. MVA disclosure).

Second, can you please try to draft some wording for the two separate applications as to the purpose of the document, which definitively considers:

For standalone:

- To get a BC Services Card;
- To renew enrolment in MSP.

For combo:

- To get a BC Services Card;
- To renew enrolment in MSP; and
- To renew your Driver's Licence.

Make sense? Set up a ½ hour with me to review this week.

Thanks,  
Alison

# DRAFT PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - New or Existing Program, System or Legislation

### 1. Ministry/Public Body and Program Area.

Ministry / Crown Corporation	Health (MOH), Public Safety and Solicitor General (PSSG), Citizens' Services (LCTZ - Shared Services BC, Service BC and OCIO) and Insurance Corporation of BC (ICBC)
Division	HSIMT, Ministry of Health Services
Branch/Section	Business Management Office
Program	BC Services Card – Transforming the BC CareCard

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

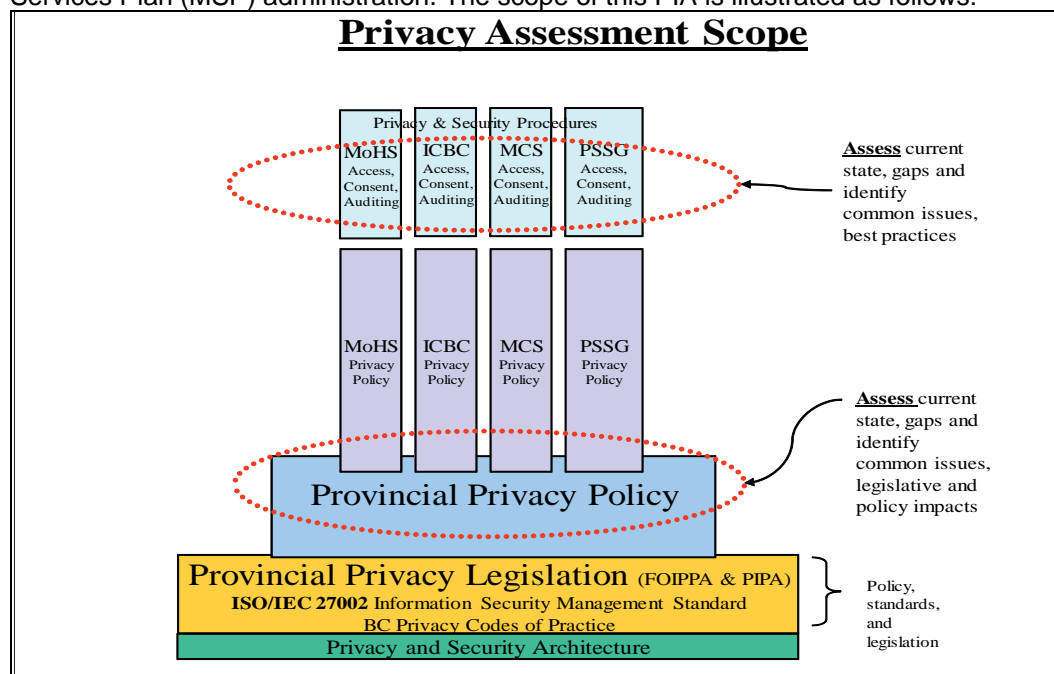
Name, Title	Carolyn Bell, Executive Director, BMO, HSIMT
Branch/Section	Business Management Office
Phone Number	250-952-6202
E-Mail	Carolyn.Bell@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

#### 3.1 WHAT:

The BC Services Card Project is a joint initiative between the Ministries of Health Services (MoHS), Citizens' Services (MCS), Public Safety and Solicitor General (PSSG) and the Insurance Corporation of BC (ICBC). The project will leverage existing government systems and business processes including ICBC driver's licence technology and identity management processes and Health's Medical Services Plan (MSP) administration. The scope of this PIA is illustrated as follows:





**Project Context:**

The current BC CareCard was introduced in 1989 and has not been significantly changed in the last 20 years. The CareCard serves the dual purpose of identifying health clients and establishing eligibility for provincially funded health services but also has unintended applications in the broader private sector (e.g. banking). Existing health benefits administration business practices for Medical Services Plan (MSP) enrolment, issuing CareCards and accessing health care services have not kept pace with industry anti-fraud and identity proofing measures.

Over the last year, MoHS and its project partners produced “The BC CareCard Strategy” and an associated business analysis outlining options for enhancing the health sector credential. The strategy recommended short term measures to enhance health fraud investigation, strengthen point of service processes and data quality, enhance residency verification processes, and add expiry dates to current CareCards, while continuing long term work to create a new, high identity assurance CareCard. Direction from MoHS Executive was this strategy did not go far enough to upgrade client privacy protections, strengthen healthcare credentials or help reduce the potential for fraud.

As a result of this work, the BC Services Card Project was initiated as a multi-organization, multi-year, multi-phase project. The project will include developing and deploying the proposed smart BC Services Card for government with MoHS as the first ministry to onboard. The BC Services Card will address the identified operational business needs of the health care sector for a stronger health credential. This will be supported via the OCIO’s proposed central identity services model which will enhance privacy protections and identity proof individuals.

The Ministries of Health Services, Citizens’ Services, and Public Safety and Solicitor General have collaboratively designed the project to leverage existing best practices in identity management services across all ministries in order to create a more secure identity credential that can be used in both the health and broader public sectors. This credential would replace the existing CareCard.

The requirement for this high assurance identity credential was highlighted in the Deputy Minister’s Council on Transformation and Technology (DMCTT) discussion paper “Being a Smarter Government,” and the 2010 paper “Citizens at the Center: BC GOV 2.0 Strategy.”

The outcome of the joint business analysis was presented to the Agenda and Priorities Committee in October 2010. Health Services was asked to proceed with the implementation of a smart card that could be integrated with an individual’s driver’s licence.

**Health Sector –Mandatory Re-enrolment in MSP**

From a MoHS perspective, mandatory re-enrolment of all current MSP beneficiaries in the Province is necessary to confirm program eligibility (based on client identity and residency), update client information, and remove those clients who are no longer eligible. The mandatory re-enrolment of all current MSP beneficiaries will result in the issuance of a BC Service Card. Use of the new cards in the health context will require new policies that include, but are not limited to, confirmation of identity and coverage status as part of access to services. In order to achieve a high identity assurance during re-enrolment, individuals will be required to present in person at service counters for identity verification and photo capture. Children, as defined by the *Infants’ Act*, will be exempted and other sub-population group exceptions will apply.

The Ministry of Health Services will also need to undertake significant change management within the public and health services sectors to implement new policy and compliance standards for accessing health care at all points of service (e.g. physician’s offices, health authorities, clinics, hospitals, advocacy groups, pharmacies, other health facilities, and other stakeholders).

### ***The BC Services Card and Enhanced Privacy Protection:***

An illustration of the BC Services Card Privacy Protection Themes being employed under this initiative is included in APPENDIX A.

Although this project began as a health initiative solely focused on improvements to the CareCard, broader corporate government strategies have identified the need to embrace service modernization and transition to online client self-service. Providing British Columbians online access to government services and their sensitive personal information is not feasible unless there is a trustworthy means of verifying a client's identity information over the Internet. The harmonization of the health sector's requirement for improved identity services and practices with the corporate e-Government strategy to provide British Columbians online access to government services, has positioned the BC Services Card to meet both program and corporate requirements.

Although the BC Services Card will meet corporate client service objectives, it will also serve as a health card within British Columbia and Canada. The BC Services Card must realize the following baseline health related goals that have been approved by government executive:

1. Enhance privacy protections;
2. Ensure the delivery of health services to the right person, enhancing the accuracy of health record information;
3. Enable secure online client access to health and other government information and services;
4. Leveraging a combined card for all BC Government;
5. Leverage existing front counter and secure identity information practices;
6. Reduce consumer fraud resulting from Care Card misuse; and,
7. Reduce identity theft resulting from Care Card misuse.

Following extensive analysis and planning, the recommended direction is to:

Replace the CareCard with two cards:

- a new, smart BC Services Card primarily for non-drivers, and
- a new combined BC Driver's Licence that incorporates the functions of both the new BC Services Card and current Driver's Licence.

In conjunction with these cards, a new BC Government identity assurance service will be created.

The proposed photo BC Services Card may be combined at the client's request with their driver's licence, with some exceptions. The photo BC Services Card will include a photograph that is compatible with digital facial imaging technology, a computer-chip using the latest technology security, be forgery resistant, and enable electronic access to multiple government services.

There will also be a non photo BC Services Card for sub-population groups identified as not requiring counter identity proofing and a photograph (e.g. children, individuals 75 or older, and individuals in residential care.). The non-photo card will have the same look as the photo card (except it will not contain a photograph) and will contain a contactless chip.

The non-photo BC Services Card will be considered to have moderate identity assurance whereas the photo BC Services Card will be considered to have a high identity assurance. The photo BC Services Card will be issued to residents aged 19 – 74, which accounts for approximately 3.29 million individuals or 73 percent of the British Columbia population. The non-photo BC Services Card will have a modified application process that may involve a mail-in application. All BC Services Cards will expire and where possible, will be aligned with existing driver's licence or current BCID (current identity credential issued by ICBC for non-drivers) five year expiry cycles for client convenience.

The first BC Services Card issued within each five year expiry cycle will be free of charge to every individual who qualifies for the card. It is anticipated that similar to today, a nominal charge will be applied for duplicate or replacement cards.

The new cards will likely be phased in starting in 2012 and the current CareCard will be completely replaced within approximately five years. Delivering the smart chip-enabled high quality photo BC Services Card will require cooperation and commitment across government. The Ministry of Health Services is uniquely positioned to champion this project which will help realize significant improvements to client privacy protections, as well as the delivery of health and client services across government. Since the Medical Services Plan (MSP) program covers more than 99 percent of the BC population, a high quality card for the health sector can also be used for virtually any government service.

A new BC Services Card will be the cornerstone for a provincial client services solution and will enable secure government e-services to improve citizen access to their own personal client information, including e-Health records.

### 3.2 WHO:

A Deputy Ministers' Project Board, chaired by Health Services, is collaborating to ensure the delivery of the BC Services Card to the BC public will be a success. During the project planning phase, core services provided by the key ministry partners were identified. The collaborative model proposes leveraging these core services to reduce costs and avoid duplication:

- Ministry of Health Services –MSP administration and call centre;
- PSSG (ICBC) - front counter services, identity management and card production; and,
- Ministry of Citizens Services – enhancement of existing identity services and front counter delivery through Service BC.

See project governance structure at Appendix B for details of the structure for managing the project outcomes, budget and scope.

BC Services Card Project working groups are addressing the privacy and security protections for information flows between the three key partners identified above. The separation of roles among the three key partners has been designed to ensure the highest level of privacy protections for individuals.

See APPENDIX C for more details of the Core Services to be performed by each partner.

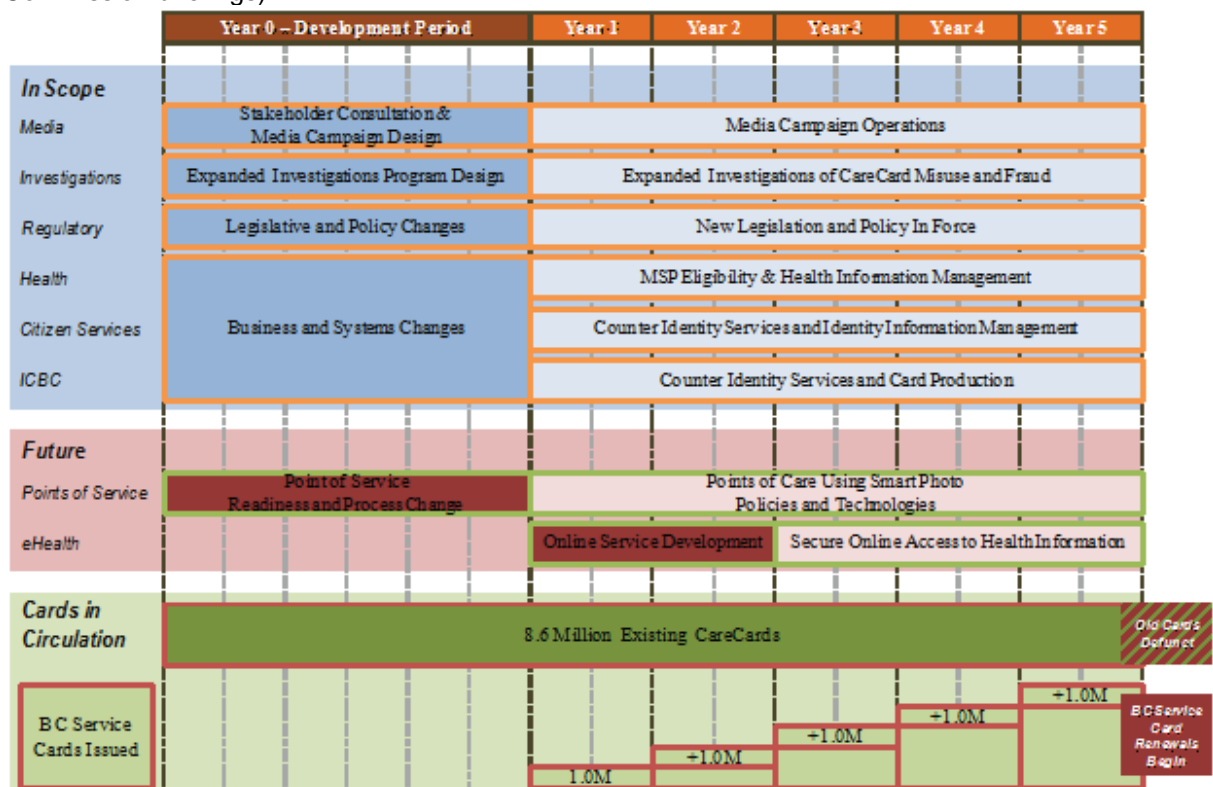
The list of key stakeholders that have an interest in the project and the delivery of the BC Services Card to the residents of BC include:

<b>Stakeholder Groups</b>
<b>Initiative Leaders</b>
Ministry of Health Services (MOHS)
Ministry of Citizens' Services (MCS)
<ul style="list-style-type: none"> <li>• Shared Services BC</li> <li>• Service BC</li> <li>• OCIO</li> </ul>
Public Safety and Solicitor General
Insurance Corporation of BC (ICBC)
MAXIMUS BC
Health Insurance BC
<b>Other Key Stakeholders</b>
Ministry of Finance, Revenue Services of BC
Public Affairs Bureau
Other ministries and Agencies

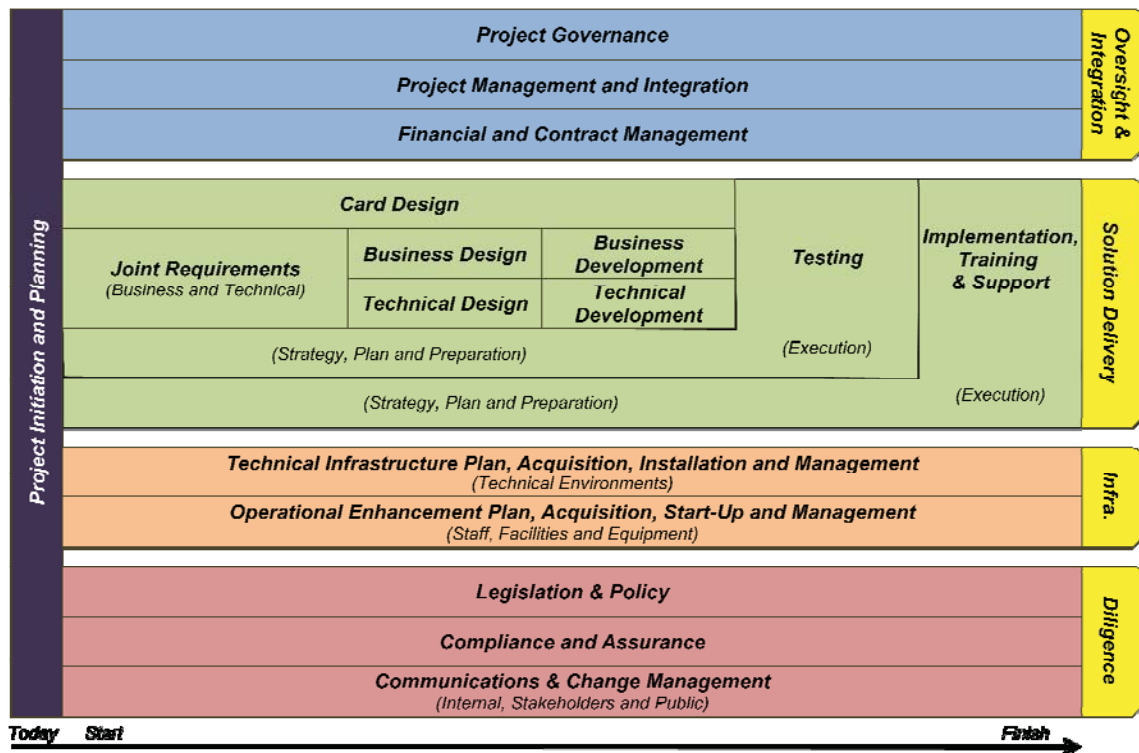
<ul style="list-style-type: none"> <li>• Ministry of Housing and Social Development (and its third-party service providers)</li> <li>• Ministry of Children and Family Development</li> <li>• Ministry of Health Living and Sport</li> <li>• Vital Statistics Agency</li> </ul>
Health Authorities
College of Physicians and Surgeons of BC
Health Care Providers/ Organizations <ul style="list-style-type: none"> <li>• BC Medical Association</li> <li>• College of Pharmacists</li> <li>• Health Canada</li> <li>• Mental Health Service Centers (MHSCs)</li> <li>• Medical Office Assistants' Association of British Columbia</li> <li>• Individual providers – doctors, pharmacists, MOAs, surgeons, pharmacies, etc.</li> <li>• Supplementary health care providers (e.g. Chiropractors and naturopaths)</li> <li>• Long term and continuing care</li> </ul>
Low-income and homelessness advocacy and outreach groups
Seniors advocacy groups
MSP Group plan administrators
The public

### 3.3 WHEN:

The BC Services Card Project will be managed through a multi-stream approach, each of which will produce a set of deliverables. The current target date for the release of the first cards is **spring 2012**. A full project schedule with key milestones will be produced when Treasury Board approval is secured for the project funding and related deliverables are approved (e.g. Medical Services Commission briefings).

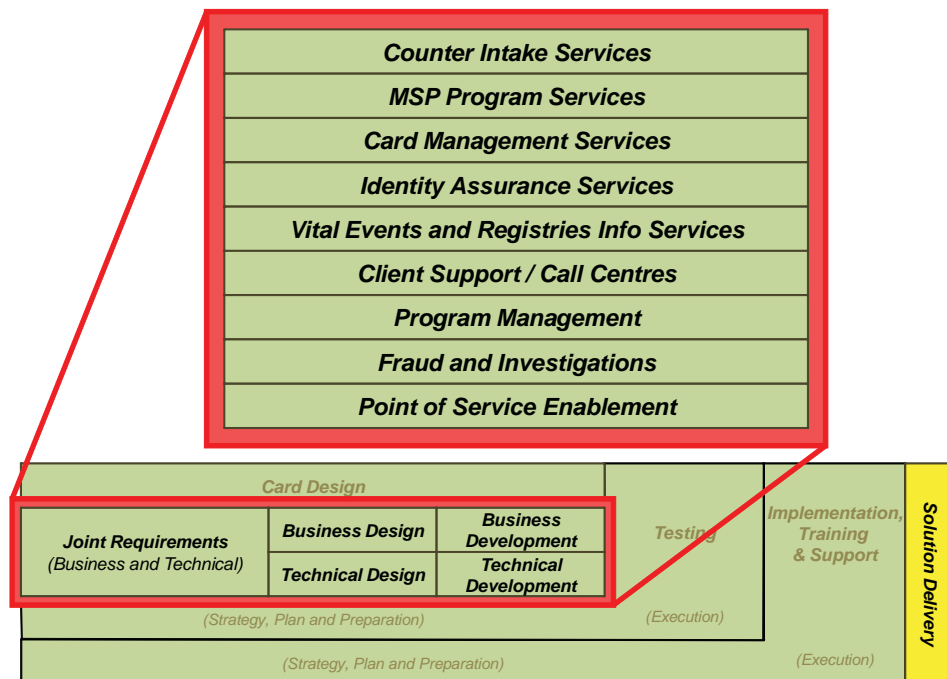


The following diagram illustrates the major work streams which are planned for the project:



Solution Delivery is further broken down into nine Solution Streams that encompass the scope of the BC Services Card (if you require further detail on these streams, please see Appendix C). The first five Solution Streams are considered Core Services.

## Work Streams: Requirements, Design & Development



### 3.4 WHERE:

The primary jurisdiction for the BC Services Card is the Province of BC where it will be used to access government wide services.

However, as is the case with the current BC Drivers Licenses, the BC Services card will be used in other parts of Canada and internationally to gain access to medical services provided by physicians. On presentation of a valid card, the physicians will bill their own medical services plan and the provinces / territories will recover the funding between them. The use of the card is covered for medical services under Reciprocal Billing Agreements with the provinces and territories in Canada (except Quebec). When travelling in Quebec or outside of Canada, the card may be used to provide information to the physician but the costs will be paid by the patient at the point of service and claimed by the traveller on return to BC, either through travel insurance or a MSP out of country claim.

## 4. Purpose/Objectives of the initiative (if statutory, provide citation).

### WHY:

#### **Public Sector:**

The Deputy Ministers' Committee on Transformation and Technology (DMCTT) has been created to respond to both demographic challenges and demands for improved and efficient service delivery. Government must leverage technology solutions and innovation to transform the way it does business to meet these challenges.

The committee is responsible for developing the BC Public Service's Gov 2.0 strategy - the strategic vision and direction for how technology and infrastructure is used over time to support government's transformation agenda and citizen expectations for e-services. The defining principles of Gov 2.0, which guide much of the committee's work, are the following:

1. We will empower citizens to create value from open government data.
2. We will strive to save citizens' time in their interaction with government and make it easier to access better quality services.
3. We will encourage collaboration in the public service because it is integral to delivering quality service to citizens.

The cornerstone of this strategy is a high assurance credential that would be used to access government e-services, while ensuring client privacy and safety.

#### **Health Sector:**

Owing to current practices, the number of CareCards potentially in circulation is significantly greater than the number of current MSP beneficiaries, creating a potential for CareCard misuse or fraud. Except for limited cases, the current CareCard does not carry an expiry date. Also, although designed as a tool for accessing health services, the CareCard has gained wider use as a government issued identity credential. As the CareCard can be easily obtained, it is an accessible vehicle for identity theft and can be used as a supporting document to fraudulently obtain higher level identity documents such as a Canadian passport.

Government spending in the Ministry of Health Services in 2009/10 reached \$13.92 billion, an increase of 61 percent from \$8.65 billion in 2000/01. The scale and rate of escalation in health service costs calls for assurance that provincial spending is applied only to eligible persons. It is not possible to calculate the extent of CareCard misuse or fraud. The Ministry of Health Services conducts limited investigations related to the reported misuse of CareCards by non-eligible persons, but this does not cover the full extent of potential misuse or fraudulent activity.



The Canadian Health Care Anti-fraud Association estimates that from 2 to 10 percent of every health care dollar in North America is lost to fraud (source: [www.chcaa.org](http://www.chcaa.org)). This indicates potential BC health care fraud costs of between \$260 million and \$1.3 billion each year. These statistics represent the broad spectrum of possible categories of health care fraud, including provider fraud, and not just to misuse of CareCards.

Apart from the potential for identity theft and fraud, misuse of the CareCard has important ramifications for patient safety. The sharing of CareCards, whether through deliberate misuse or ignorance, can result in confusing and potentially life-threatening errors in paper and electronic health records.

The future of the CareCard can be harmonized with government's broader need for providing secure access to services and information, both online and offline, and for enabling service integration across sectors and program boundaries. The lack of a trusted means for confirming identity and eligibility is a roadblock confronting every sector of the government that directly provides programs services to clients. Another key issue is government's ability to protect citizens' personal information, including their health records. Any plan for something new must be done in a way that enhances and does not erode privacy protections.

## 5. **What are the potential impacts of this proposal?** (Include privacy impacts in this description).

### ***Health Care Providers and Points of Service:***

In order for public service providers to provide services, including health care, to the correct individual and to ensure the high assurance of BC Services Card, a balance is required between access and privacy. Accordingly, the BC Services Card will adhere to the **need to know** and **least privilege** access principles to minimize privacy impacts, as defined in the BC Government's *Core Policy and Procedure Manual*:

- *Need to Know*: A privacy principle where access is restricted to authorized individuals whose duties require such access. Individuals are not entitled to access merely because of status, rank or office. This will be the governing principle of this initiative: its purpose is to minimise privacy breaches as much as possible.
- *Least Privilege*: A security principle requiring that each subject in a system be granted the most restrictive set of privileges (or lowest clearance) needed for the performance of authorized tasks. The application of this principle limits the damage that can result from accident, error or unauthorized use.

### ***Broader Public Sector:***

There will be many impacts to the way government delivers its services to the public over time. The proposed implementation of the BC Services Card over a five year schedule will meet many of the GOV 2.0 principles. This transition will affect the stakeholders involved in areas such as: culture, policy, business, operation, systems, interfaces, procedures, service providers and better protection of privacy.

During the five year implementation, there will be old CareCards and new BC Service Cards in circulation. The introduction of the BC Service Card will require detailed planning and communication at front counters, with other provinces and territories, stakeholders within the Province who currently use the CareCard (e.g. BC Ferries), points of service, health care providers and to all stakeholder ministries in the Province. A policy framework that includes, but is not limited to, describing technological and infrastructure changes is being developed and will continue to be refined over the coming months.

### **Citizens:**

After the implementation is complete, the proposed BC Services Card model will generally require existing Medical Service Plan (MSP) beneficiaries (approximately 99 percent of the province's population) to re-enrol in the MSP every five years to maintain their active coverage status. Children, as defined by the *Infant's Act* will be exempted from re-enrolment. In order to re-enrol, individuals will have to confirm their identity and residential address as required in order to receive a new BC Services Card once their original BC Services Card expires. While eligible individuals would never be refused health services, presenting an expired BC Services Card could result in an individual paying for the service up front, and submitting a claim application to MSP later to recover costs once re-enrolment is completed.

### **Technology:**

The BC Services Card will enhance the privacy and security of information through the use of modern technology and best practices. The system is being designed with information privacy features such as:

- Contactless chip technology that carries no personal information;
- Authentication of card users at points of service and, in the future, for remote access; and,
- Cryptographic security capabilities.

British Columbia's plan for using secure chip card technology will include careful consideration for security and privacy implications. Appendix E has a generic information flow diagram showing the creation of an individual BC Services Card and some of the privacy and security aspects that need to be considered in detail. BC will not use chip technology to store a person's identity or personal information. BC's plans for using secure chip technology call for it to be used only as a secure cryptographic device for the cardholder. To work, the genuine card must be present, must be used in conjunction with a genuine reader and, where appropriate, with a passcode (PIN) that will only be known by the cardholder. Attempts to "read" the chip in the card will not provide information about the person, because none is stored on the chip in the first place. A generic information flow diagram for this process and some of the privacy and security aspects that need to be considered in detail is shown in Appendix F

Although many details need to be determined, it is expected that drivers licence service counters (ICBC, Service BC and Appointed Agents) will collect the BC resident's identity information as a service provider on behalf of MOHS and MCS. Use of this identity information to access government services will be enabled by the MCS Identity Assurance Service (IAS) including a system of anonymous program identifiers for each participating government program. For example, the MSP program will store a "Directed Identifier" (or "DID" - an anonymous identifier linked to the PHN) for each MSP client in the IAS. Only the MSP program will be able to translate its anonymous identifier back to the corresponding PHN. This will also be the case for any and all participating programs. Indeed, the central IAS does not "know" the program identifiers for the programs in which an individual is participating. This will ensure that data linkage within and across ministries will not be possible without explicit cooperation, data-sharing agreements and requisite legal authorities. This is an important privacy enhancement.

MCS will need to consider the delegation of authority to ICBC and MoHS to collect Identity information on behalf of MCS for photo and non-photo card clients respectively. The separation of stakeholder roles into collection, identity confirmation, and program users is an important privacy protection.



**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

This is a conceptual PIA. Individual PIA's will be completed by each lead organization for the Design and Implementation phases of the project. Additionally, an overarching PIA will be created for the project.

**IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO [X. SIGNATURES](#).**

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have altered the definition of personal information from "recorded information about an identifiable individual" to "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted. The amendments also generally alter the definition of public body employee to include a volunteer, and extend a public body's responsibilities under Part 3 of the Act to its employees, officers and directors and to its service providers and their employees, associates or affiliates.

## **II DESCRIPTIVE INFORMATION**

- 1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the amended definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

**To be determined in future project phases.**

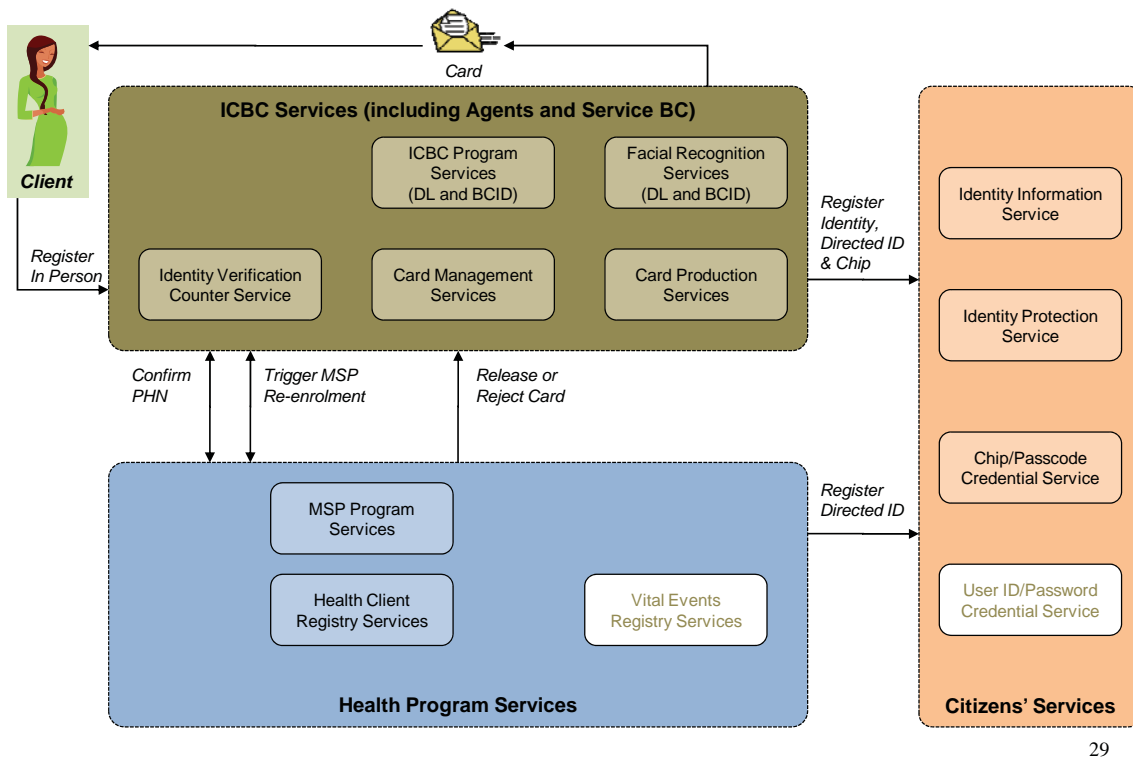
As this is a Conceptual PIA, it is out of scope.

See Section III below which states "Only personal information that is required by the program to issue the card will be collected from the client. Because this is a conceptual PIA it is out of the scope to identify the exact information that will be collected, used or disclosed using the BC Services Card.

- 2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

The following diagram illustrates how limited personal information is proposed to flow between the project partners to facilitate production of a BC Services Card (with photo) for a typical BC client. The data will be transmitted online over secure communication lines from ICBC to Health Services and back to confirm that the PHN is valid and may also enrol the client in MSP. Once confirmed, Card Management Services will register the person's information in the Identity Assurance System and send a request through secure connections to the service provider who manages the current Card Production under contract to ICBC. The service provider will produce the card and mail to the client following the current Driver's Licence and BCID processes.

## Scenario: Photo Card Request & MSP Re-Enrolment for Driver, Age 19-74



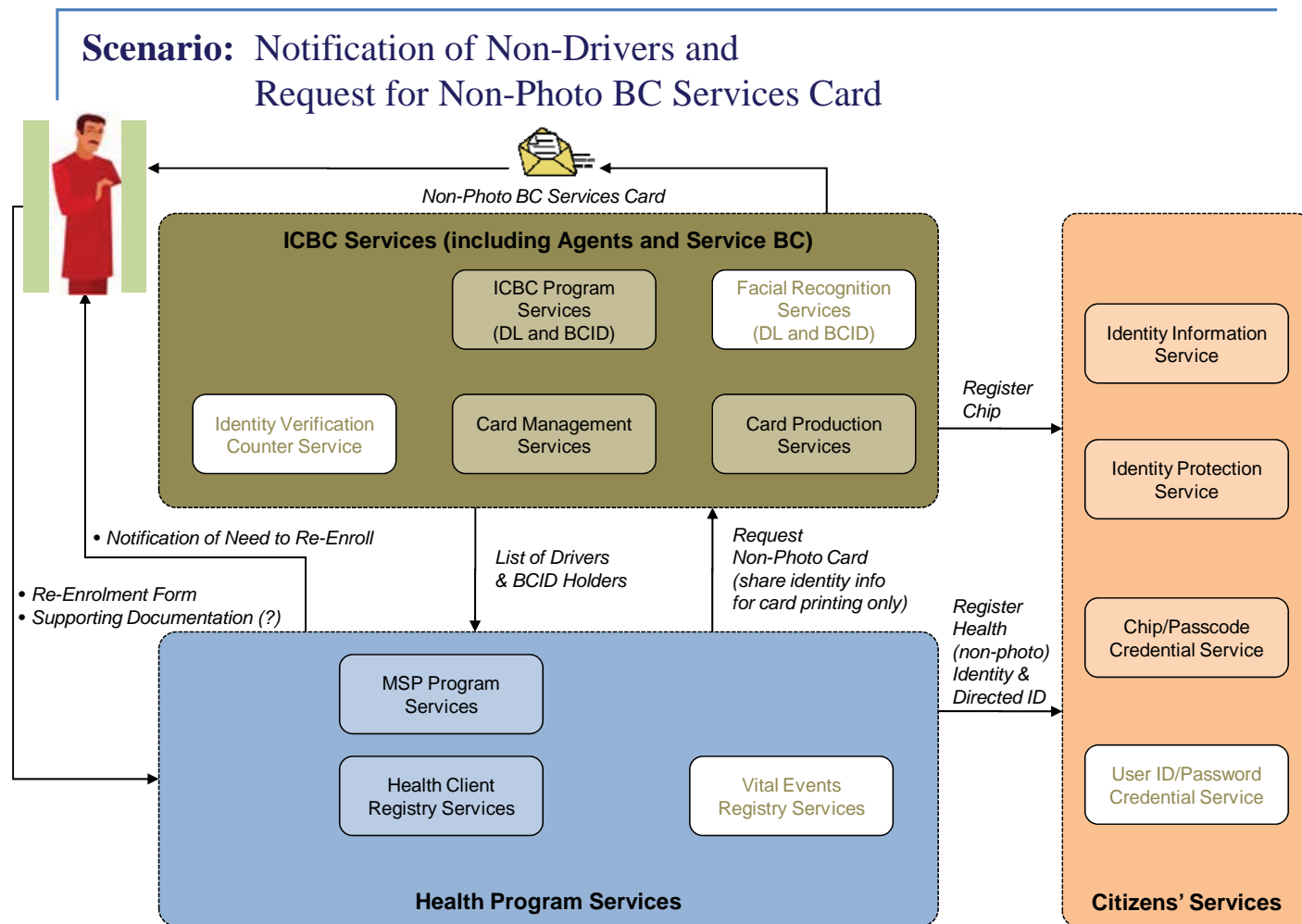
29

The processes will involve direct communication between the three of the lead organizations as follows:

- Client → Presents at ICBC counter Requests Photo Card
- ICBC counter → MAXIMUS BC-MSP Enrolment: Request Confirm PHN of client
- MAXIMUS BC-MSP Enrolment → ICBC counter: Confirm PHN
- MAXIMUS BC → Citizen's Services: Register Directed ID for PHN
- MAXIMUS BC → ICBC Card Management Services Release or Reject Card
- ICBC Card Management Services → Service Provider Produce Card
- ICBC Service Provider → Citizen's Services Register Identity, Directed ID and Chip
- ICBC Service Provider → Client Mail Card

In addition to this process, there will be separate processes for new BC residents who must first identity-proof themselves prior to the card request and enrolment in MSP. This would also trigger a request for enrolment in MSP to MAXIMUS BC.

For those BC residents who are under 19 or over 74, there will be other processes to produce a non-photo version of the BC Services Card. This is illustrated in the following diagram:



### III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

	Yes	No	n/a
Is personal information being collected?	x		

Only personal information that is required to issue the BC Services Card will be collected from the client. Since this is a conceptual PIA, it is out of the scope to identify the exact information that will be collected, used or disclosed using the BC Services Card. The legislation underpinning BC Services Card collection, use and disclosure will be complex and require legislative changes that are being actively pursued. For details on the types of legislative shifts that are required for this initiative, please see APPENDIX G.

Each program area will need to ensure that they only collect information that they are authorized to collect under the FOIPP Act as well as under any other relevant legislation including the Medicare Protection Act, SBC 1996, c. 286, E-Health (Personal Health Information Access and Protection of Privacy) Act, SBC 2008, c.38, Motor Vehicle Act, SBC 1996, c. 318 etc.

#### IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)

##### 1) Authorization for Collection:

No personal information may be collected by or for a public body unless authorized under the FOIPP Act (as covered by numbers i, ii, or iii below).

		Yes	No	n/a
i.	Has the collection of personal information been specifically authorized by, or under, an Act, other than the FOIPP Act?			x
	<b>If yes, please specify the name of the Act and relevant section</b>			
ii.	Has the personal information been collected for law enforcement purposes?			x
iii.	Is the personal information directly related to, and necessary for, an operating program or activity of the public body?			x

**If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your Director/Manager of Information and Privacy (DMIP) for ministries or the position responsible for FOI and Privacy Coordination (FOIPP Coordinator).**

##### 2) How will the personal information be collected?

A public body must collect personal information or cause personal information to be collected directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?			x

**IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO [3. NOTIFICATION TO COLLECT INFORMATION](#).**

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

### III PERSONAL INFORMATION COLLECTION cont'd

		Yes	No	n/a
i.	Did the individual the information is about authorize another method of collection?			x
ii.	Has indirect collection been authorized by the Information and Privacy Commissioner?			x
iii.	Has indirect collection been authorized by another enactment?			x
	<b>If yes, please specify the name of the Act and relevant section(s)</b>			
iv.	Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?			x
v.	Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?			x
vi.	Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?			x
vii.	Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?			x
viii.	Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?			x
ix.	Is the personal information being collected for the purpose of law enforcement?			x
x.*	Is the public body collecting personal information disclosed to it under section 33, section 33.1, section 33.2, section 34, section 35, or section 36 of the FOIPP Act?			x
	<b>Specify relevant section(s) or subsections that apply.</b>			
	<b>Additional details as required (e.g., explanation of method of collection)</b>			

***If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your DMIP or FOIPP Coordinator.***

#### 3) Notification to collect information

***A public body must ensure that an individual from whom it collects personal information or causes personal information to be collected is notified of the collection as outlined below.***

### III PERSONAL INFORMATION COLLECTION cont'd

		Yes	No	n/a
i.	Has the individual whose personal information is being collected, been informed of:			
	(a) the purpose for collection?			x
	(b) the legal authority for collection?			x
	(c) the contact information of the person who can answer questions regarding the collection?			x

**Notification is not required if the answer is “yes” to any of the following:**

		Yes	No	n/a
ii.	Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?			x
iii.	Has the Minister responsible for the FOIPP Act excused your public body from complying because it would			
	(a) result in the collection of inaccurate information?			x
	<b>or</b>			
	(b) defeat the purpose or prejudice the use for which the personal information is collected?			x
iv.	The information			
	(a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, <b>and</b>			x
	(b) is not collected directly from the individual the information is about			
	<b>Additional details as required (e.g., method of notification)</b>			

***If you have not provided the required notification as outlined above, please contact your DMIP or FOIPP Coordinator.***

#### IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

	Yes	No	n/a
Is personal information being used?	x		

Only personal information that is required to issue the BC Services Card and operate the Identity Assurance Service (IAS) will be used by the system. IAS use is Client controlled and will be triggered only by the Client as a service to establish identity and eligibility for Government services. Because this is a conceptual PIA it is out of the scope to identify the exact information that will be collected, used or disclosed using BC Services Card. Each program area will need to ensure that they only use personal information as authorized under the FOIPP Act.

#### IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO [V. DISCLOSURE OF PERSONAL INFORMATION](#)

***Under the FOIPP Act, a public body must ensure that personal information in its custody or under its control is only used for certain specified purposes as outlined below.***

The public body **must** check one or more of the authorities listed below:

		Yes	No	n/a
1.	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)			x
2.	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?			x
	<b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b>			
3. *	If the personal information was disclosed to the public body under section 33, section 33.1, section 33.2, section 34, section 35 or section 36, is the information being used for that same purpose?			x
	<b>Specify subsection(s) being applied</b>			

***If you have not checked one of the above, you do not have the authority to use the information. Please contact your DMIP or FOIPP Coordinator.***

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	x		

Only personal information that is authorized under the Act will be disclosed. Since this is a conceptual PIA, it is out of the scope to identify the exact information that will be collected, used or disclosed using BC Services Card. Each program area will need to ensure that they only disclose information that they are authorized under the FOIPP Act to disclose. The personal information will only be used by those individuals in the programs areas with a need to know and have authorization from the card holder.

**IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO  
[VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION.](#)**

***A public body must ensure that personal information in its custody or under its control is disclosed only as permitted under sections 33, 33.1, 33.2, 34, 35, and 36 of the FOIPP Act.***

**1) Disclosure of Personal Information**

Sections 33, 33.1 and 33.2 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please check the main authorization(s) for disclosure below.

**(Note that the numbering is taken from sections 33.1 and 33.2 of the FOIPP Act.)**

<b>s. 33.1</b>	<b>Disclosure inside OR outside Canada</b>	Yes	No	n/a
<b>(1)(a)</b>	In accordance with Part 2			x
<b>(1)(a.1)</b>	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):  22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,			x
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,			x
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,			x
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or			x



s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).			x
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)			x
(1)(c)	In accordance with an enactment of British Columbia or Canada that authorizes or requires its disclosure			x
	<b>Specify name of enactment and relevant section(s)</b>			
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, other than the <i>Freedom of Information and Protection of Privacy Act</i> , that authorizes or requires the information to be made public			x
	<b>Specify name of enactment and relevant section(s)</b>			
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia or Canada			x
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee,			x
	<b>and</b> (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada			x
	<b>If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>			
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body,			x
	<b>and</b> (ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada			x
	<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>			

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister			x
(1)(g)	To the Attorney General or legal counsel for the public body, for use in civil proceedings involving the government or public body			x
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act			x
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			x
	b. corporation of which the individual the information is about is or was a director or officer,			x
	<b>and</b>			
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			x
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			x
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			x
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,			x
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or			x
	(iii) resolving an issue regarding such a payment			x
(1)(j)	In the case of the Insurance Corporation of British Columbia, if			
	(i) the information was obtained or compiled by that public body for purposes of insurance provided by the public body, and			x
	(ii) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim			
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or			x
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences			x

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations			x
(1)(m)	If (i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and (ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety			x
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted			x
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)			x
(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			x
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body			x
	and (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			x
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	to another law enforcement agency in Canada			x
(2)(b)	to a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.			x
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.			x
	<b>Additional details as required</b>			

***If you have not checked any of the above authorizations for disclosure or require clarification, you should contact your DMIP or FOIPP Coordinator.***

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(a)	For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)			x
	<b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b>			
(b)	To comply with a subpoena, warrant or order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information			x
(c)	To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister			x
(d)	To an officer or employee of a public body or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties of the officer, employee or minister to whom the information is disclosed			x
(e)	To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister			x
(f)	To the auditor general or any other prescribed person or body for audit purposes			x
(g)	To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem			x
(h)	To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry			x
(i)	To a public body or a law enforcement agency in Canada to assist in a specific investigation			
	(i) undertaken with a view to a law enforcement proceeding, or			x
	(ii) from which a law enforcement proceeding is likely to result			x
(j)	To the archives of the government of British Columbia or the archives of a public body, for archival purposes			x
(k)	In accordance with section 35 (disclosure for research or statistical purposes)			x
	<b>Additional details as required</b>			

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

### 2) Systematic or Repetitious Disclosure/Exchanges?

		Yes	No	n/a
i.	Do the disclosures of personal information under section 33.2 occur on a regular basis?			x
ii.	Has an Information Sharing Agreement been completed for these disclosures/exchanges?			x
iii.	Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ?			x

**Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.**

### 3) Research or Statistical Purposes (Section 35)

	Yes	No	n/a
Has a researcher requested access to personal information in an identifiable form for research purposes?			x

**If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact your DMIP or FOIPP Coordinator for assistance.**

***Please note:*** Research using personal information may only be conducted if it meets all of the terms of section 35.

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

### 4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information or cause personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

		Yes	No	n/a
(a)	The disclosure would not be an unreasonable invasion of personal privacy under section 22			x
(b)	The disclosure is for historical research and is in accordance with section 35 (research agreements)			x
(c)	The information is about someone who has been dead for 20 or more years			x
(d)	The information is in a record that has been in existence for 100 or more years			x

***If you have not answered “yes” to any of the above authorizations for disclosure or if you require clarification, please contact your DMIP or FOIPP Coordinator.***

## VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION

(Section 28 and section 29 of the FOIPP Act)

If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

As previously noted this is a conceptual PIA. Efforts to ensure that personal information is accurate and complete are outside the scope of this privacy impact assessment. However, processes are in place today at ICBC, Service BC and MoHS to ensure personal information is accurate and complete. Since this project intends to leverage existing processes as much as possible, and accuracy and correction of personal information are key privacy requirements in any project, these considerations will be incorporated.

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?			x
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?			x
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?			x
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:			
	Phone number:			
	<b>Additional details as required</b>			

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator for further clarification.***



## VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the FOIPP Act)

**Note:** For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the [Signatures](#) section.

For PIAs that do not involve systems initiatives, this section should be completed by the Branch or DMIP/FOI Coordinator completing the PIA. In this case, the signature of the systems representative is not required.

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?  <b>Note:</b> A series of Security Threat and Risk Assessments are being undertaken by the Project Team. BC Services Card will only proceed with satisfactory resolution of the results of these assessments.			x
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?  <b>Note:</b> A series of Security Threat and Risk Assessments are being undertaken by the Project Team. BC Services Card will only proceed with satisfactory resolution of the results of these assessments.			x
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?			x
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?			x
5.	Do controls and procedures exist for the authority to add, change or delete personal information?			x
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?			x
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				

7.	Does the audit identify inappropriate accesses to the system?  <b>Note:</b> A series of Security Threat and Risk Assessments are being undertaken by the Project Team. BC Services Card will only proceed with satisfactory resolution of the results of these assessments.  Each organization's PIA will detail the audit capabilities within each of the partner's systems.			x
	<b>Additional details</b>			

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator.***

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

		Yes	No	n/a
	Will the information be stored or accessed only in Canada?			x

**Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

		Yes	No	n/a
1.	Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?			x
	<b>Please explain</b>			
2.	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?			x
	<b>Please explain</b>			
3.	Will the personal information be disclosed under section 33.1(1)(i.1)?			x
	<b>Please explain</b>			

***If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact your DMIP or FOIPP Coordinator.***

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

**If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.**

As previously noted this is a conceptual PIA. The retention of personal information will be the responsibility of the individual program areas and is outside the scope of this privacy impact assessment.

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?			x
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?			x

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your DMIP or Records Officer.***

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**

**IX DIRECTOR/MANAGER OF INFORMATION AND PRIVACY (DMIP) OR FOIPP COORDINATOR REVIEW**

		Yes	No	n/a
1.	Have you contacted the individual responsible for the completion of the PIA to discuss the information submitted, in particular those questions identified by an asterisk (*)?	x		
2.	Does the initiative meet the requirements of the FOIPP Act?	x	x	
3.	Is there a mechanism in place to review this PIA, as appropriate, to ensure the information remains current?	x		
4.	Are you satisfied that the policies/procedures for correction and/or annotation are adequate?	x		
<p><b>If there is additional information that would support the intended collection, use or disclosure of the personal information, please either insert in the appropriate text box or append to the PIA.</b></p>				
<p><b>Comments</b></p>				

**X      SIGNATURES**

**PUBLIC BODY APPROVAL:**

---

Elaine McKnight  
Assistant Deputy Minister  
HSIMT  
Ministry of Health Services

---

Date

---

Carolyn Bell  
Executive Director  
Business Management Office  
Ministry of Health Services

---

Date

---

Deb McGinnis  
Executive Director  
eHealth Privacy, Security and Legislation Office

---

Date

---

Stephanie Power  
Director  
Medical Services Operations  
Ministry of Health Services

---

Date

---

Dave Nikolejsin  
Chief Information Officer  
Citizens Services

---

Date

---

Charmaine Lowe  
Executive Director  
Standards & Architecture  
Citizens Services

---

Date

---

Kevena Bamford  
A/Executive Director  
IDIM Service Design  
Citizens Services

---

Date

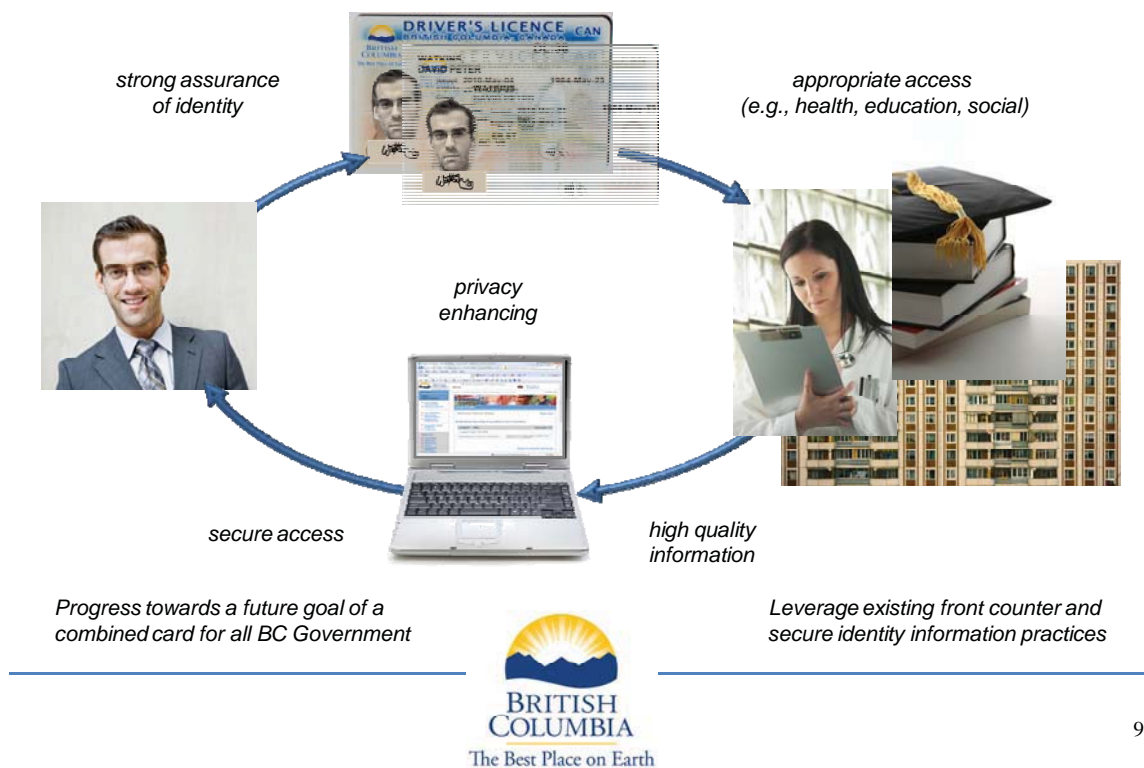
**GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA and/or ISA summary)**

## APPENDICES

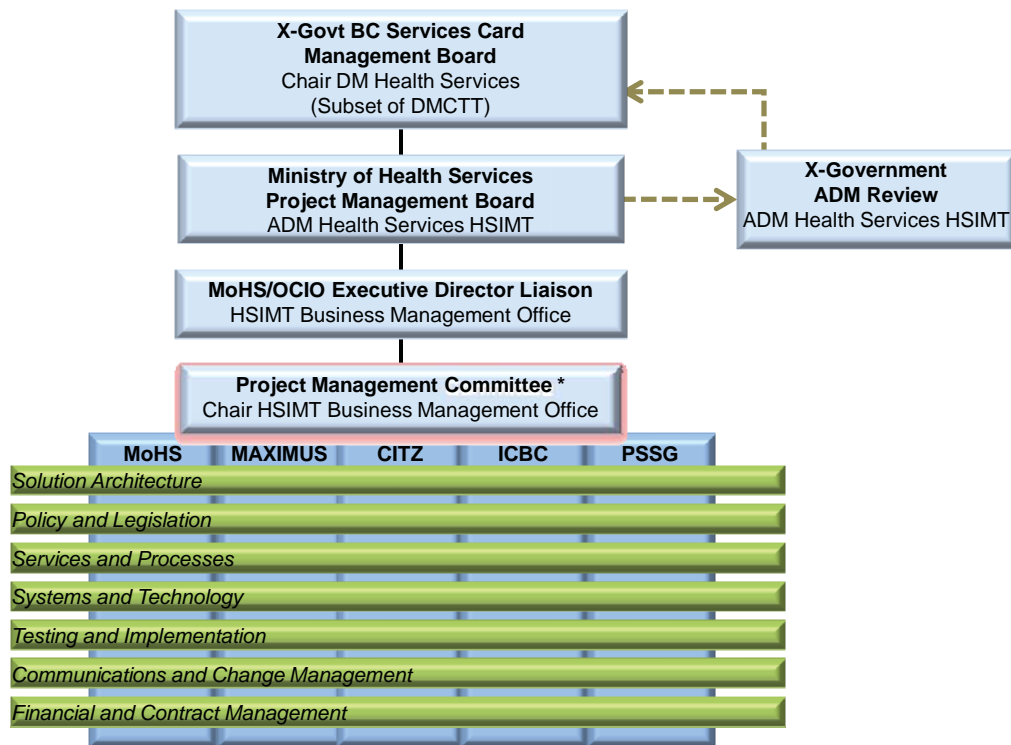
### APPENDIX A:

#### OVERVIEW OF BC SERVICES CARD PRIVACY PROTECTION THEMES

### Why a new BC Services Card?



## BC Services Card -Project Governance



## APPENDIX C:

### BC SERVICES CARD SERVICE STREAMS IN MORE DETAIL

The first five streams are considered the Core Services Streams.

1. **Counter Intake Services** – All activities associated with (1) getting clients to come to the counter and (2) handling all types of client counter transactions (identity proofing, card replacement, etc.).
2. **MSP Program Services** – All activities associated with mail-in client transactions involving participation in the Medical Services Plan (e.g., initial enrolment, photo exemptions, etc.). Includes notification of clients that do not need to present at the counter.
3. **Card Management Services** – Services for requesting, producing and monitoring the state of individual BC Services Cards (all types). Includes services to deactivate cards for individuals that have left the province or that require a replacement card.
4. **Identity Assurance Services** – Services to record and share identity information across government programs while ensuring the protection of private and program-specific information. Also includes services to ensure synchronization of identity information across participating programs in the event of changes (e.g., name change, death, etc.).
5. **Vital Events and Registries Information Services** – Interface services to existing Vital Events and Health Client Registries.
6. **Point of Service Enablement** – Services to enable health care points of services (e.g., physician's offices) to validate cards and cardholder eligibility at time of card presentation
7. **Client Support (Call Centres)** – Call centre services for responding to general client queries regarding the new BC Services Card, processes to follow, and such. Requires alignment of call centres currently in use across partner programs, including Enquiry BC, ICBC and MAXIMUS. Also requires consideration of integration/interfacing of related information systems (e.g., to check status of card request).
8. **Program Management** – The collection of internal functions needed to ensure ongoing effectiveness of the BC Services Card Program. Includes such things as:
  - General suite of program monitoring services to enable tracking and changes over time of throughput, service volumes, costs, and other performance metrics. Specifically includes metrics for measuring identity and credential misuse and abuse
  - Ongoing program communications, such as may be required for appeals, exceptional interventions and public
  - Alignment and management of policies and responsibilities across partner organizations
  - Agreements among the partner agencies (e.g., Service level agreements, information sharing agreements, etc.)
9. **Fraud and Investigations** – Services to detect, investigate and respond to potential BC Services Card misuse and abuse. Operates as an integrated service across all participating government programs.

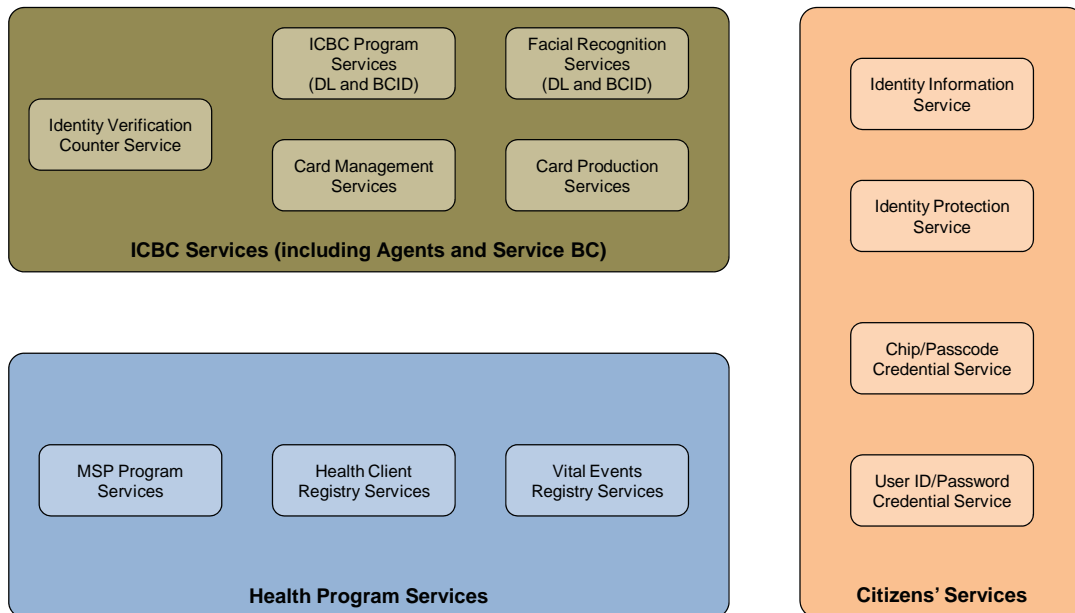


## APPENDIX D

### HOW KEY PARTNERS WILL WORK TOGETHER TO PROTECT PRIVACY

The Core Services will be delivered by the three Key Partners shown in the following diagram; BC Services Card Working Groups are addressing the privacy and security protections for information flows among them. The separation of roles among the three Key Partners is a privacy enhancement.

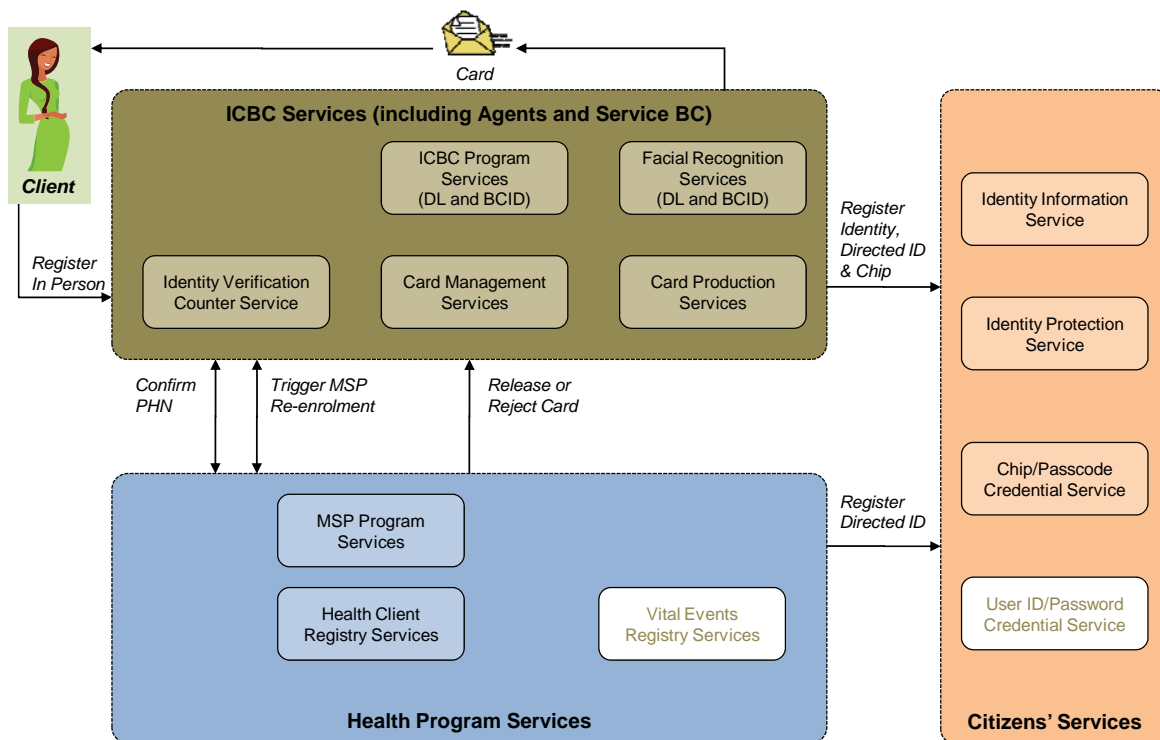
## Composition of Core Services, by Partner



## APPENDIX E

### FUTURE TYPICAL PROCESS FOR GETTING A BC SERVICES CARD

#### Scenario: Photo Card Request & MSP Re-Enrolment for Driver, Age 19-74



It is proposed that the ICBC Counter Services could be responsible for executing additional processes to those they currently perform at the counter as follows:

- ☐ Confirm Card Preferences
- ☐ Educate Client about Options
- ☐ Notify/Consent to Info Purposes
- ☐ Verify Health Program ID (PHN)
- ☐ Update Client Registry (TBD)
- ☐ Assert Residency (TBD)
- ☐ Obtain MSP Declaration (TBD)
- ☐ Collect Corporate ID Information
- ☐ Issue Temporary "PHN" Card

## Typical Experience at a Health Care Point of Service



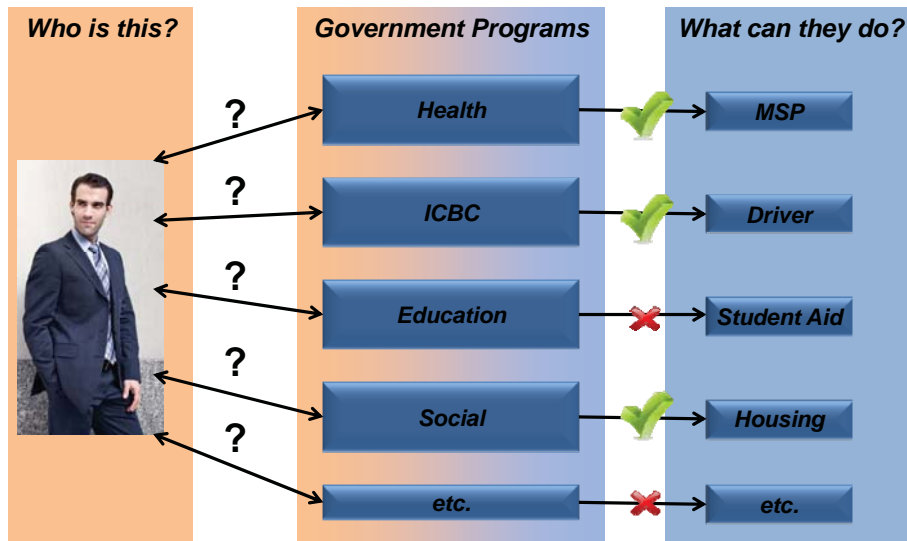
## Enabling the New Card: Draft Legislative Considerations

		Current Authority
<b>Data Ownership</b> ( <i>collection, use, disclosure</i> )		
• Identity Data (first contact & updates)		Medicare Protection Act (MPA), Motor Vehicle Act (MVA), Freedom of Information and Privacy Protection Act (FOIPPA)
• Identity Information Sharing		MPA prohibits
• MSP (Re)Enrolment		MPA
• MSP Information Sharing		MPA prohibits
• DL Registration		MVA
<b>Cards/Credentials</b> ( <i>issuance, seizure, fees</i> )		
• CareCard		MPA Regulation
• Driver's Licence		MVA
• BC ID Card		MVA Regulation
• Combo BC Services Card + DL		n/a
• BC Services Card (photo/non-photo)		n/a

**Other potential legislative impacts:** eHealth Act, Vital Statistics Act, etc.?

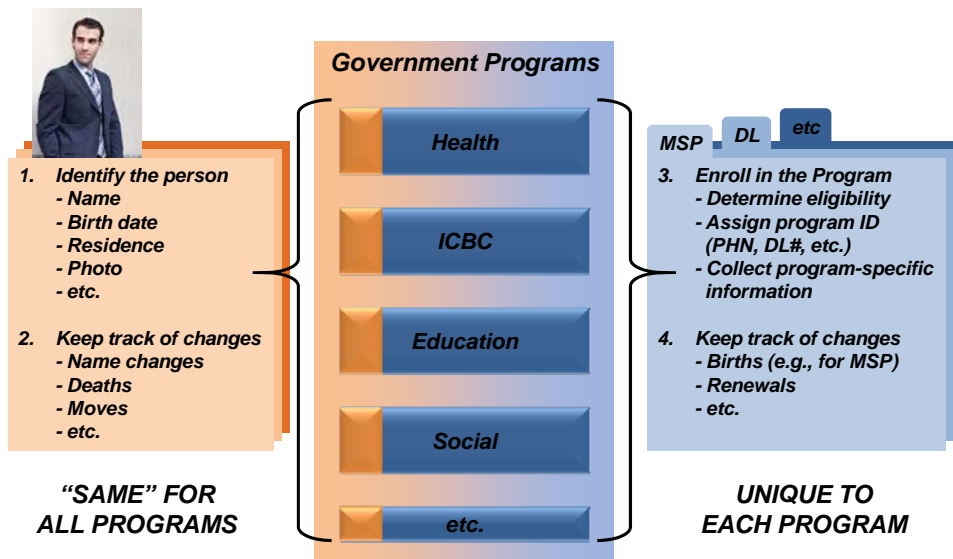
Other possible appendices for consideration:

## Identifying Clients for BC Government Services: Today

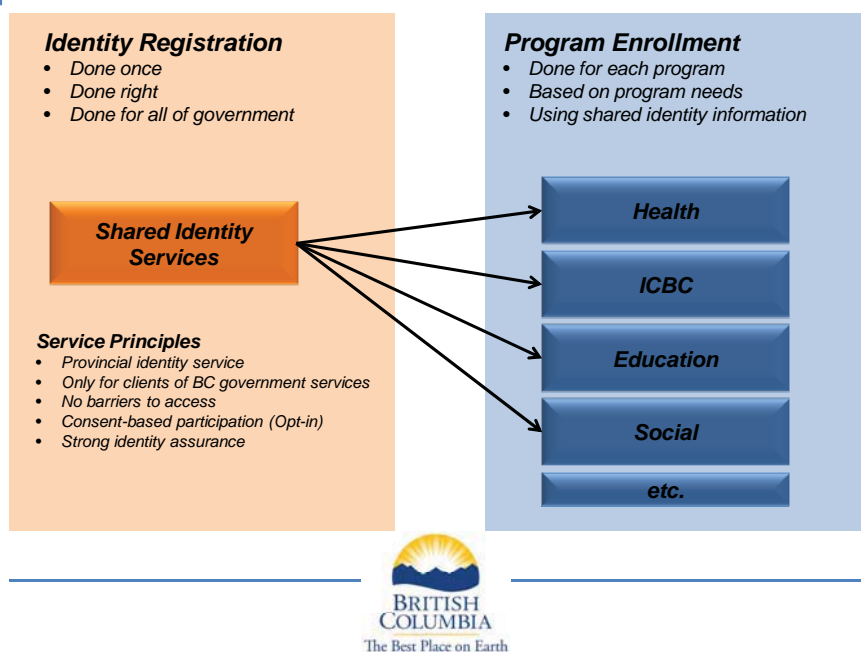


2

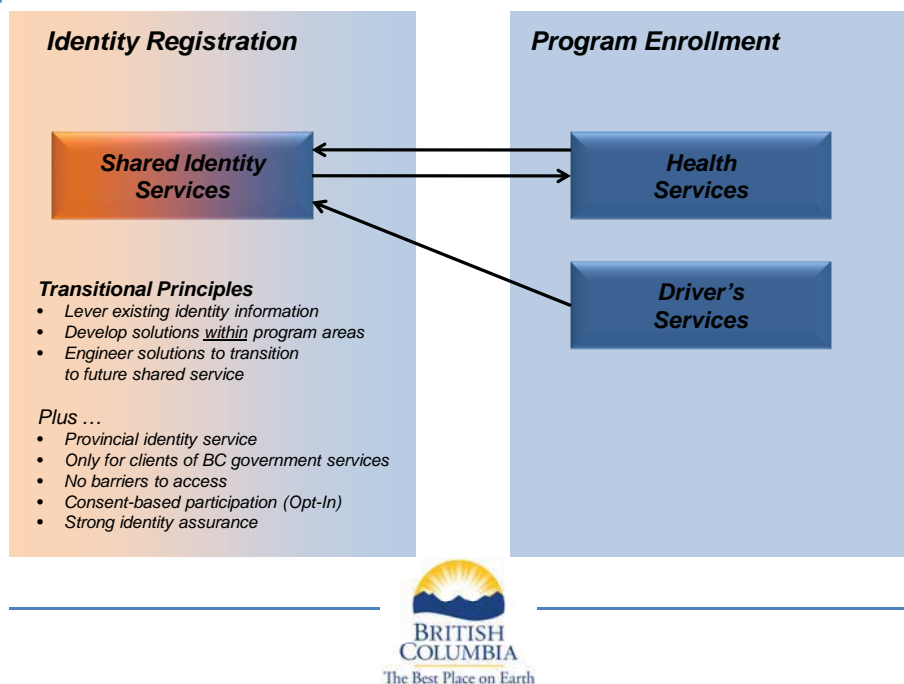
## Identifying Clients for BC Government Services: Today



## End State Vision: BC Government Client Identity



## Starting Point: Health, ICBC & the New CareCard



**From:** [Boden, Darren HLTH:EX](#)  
**To:** [Boden, Darren HLTH:EX](#); [Ito, Miwa HLTH:EX](#); [Sieben, Nikki HLTH:EX](#);  
[Schmidt, Tracee HLTH:EX](#); [Gale, Catherine HLTH:EX](#); [Pearce, Alison HLTH:EX](#); [Lucas, Janet HLTH:EX](#); [Trisko, Coral HLTH:EX](#);  
[Power, Stephanie A HLTH:EX](#); [Boulton, Michael HLTH:EX](#);  
[Lim, Ginette HLTH:EX](#); [Friswell, Guy HLTH:EX](#); [Ball, Leila M HLTH:EX](#);  
[Thambirajah, Natasha HLTH:EX](#); [Dowds, Chris H HLTH:EX](#);  
[Dong, Kelly HLTH:EX](#); [Keay, Liz HLTH:EX](#); [Beyea, Bonnie HLTH:EX](#);  
[White, Robyn S HLTH:EX](#); [Mitchell, Tamara HLTH:EX](#); ["Tanya Howes"](#);  
[Redmond, Jackie M HLTH:EX](#); [Malovec, Anita VSA:EX](#);  
[Szolnianszky, Margaret HLTH:EX](#); [Duke, Leslea M HLTH:EX](#);  
[Robinson, Michele FIN:EX](#); [Cleveland, Megan HLTH:EX](#);  
**Subject:** Draft Fraud PIA  
**Date:** Tuesday, October 2, 2012 1:52:20 PM  
**Attachments:** [Fraud PIA - Review Sept 28.docx](#)

---

As discussed at the Core Team Meeting this morning, attached is the latest draft of the Fraud PIA.

Darren

**DARREN BODEN**, B.Comm, CMC

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Health Sector IM/IT Division  
Ministry of Health  
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**From:** [Basi, Kash FIN:EX](#)  
**To:** [Laine Farrell, Derek HLTH:EX;](#)  
**cc:** [Reed, Matt CITZ:EX; Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** DRAFT PIA"s for BC Services Card  
**Date:** Friday, January 6, 2012 9:44:23 AM  
**Attachments:** [BC Service Card Privacy Impact Assessment - PHN on Mag Stripe \(v5\) Nov 15 2011.docx](#)  
[DRAFT BC Service Card Privacy Impact Assessment v1.docx](#)

---

Hi Derek,

Although a few of us here at Knowledge and Information Services, OCIO, will be working on the IDIM/BC Services Card initiative, I am (at least for now) your primary contact here regarding PIA/s.

Once the documents are further edited over the next few weeks (as you mention below), can you please send me updated versions?

Thanks, Kash

Kash Basi, A/Manager, Operational Privacy and Projects (tel: 250 387-6403)  
Knowledge and Information Services Branch, Office of the Chief Information Officer  
Ministry of Labour, Citizens' Services and Open Government; Website: <http://www.cio.gov.bc.ca/>

---

**From:** Laine Farrell, Derek HLTH:EX  
**Sent:** Wednesday, January 4, 2012 10:15 AM  
**To:** WTS CPIAADMIN SSBC:EX  
**Cc:** Reed, Matt CITZ:EX; Laine Farrell, Derek HLTH:EX  
**Subject:** DRAFT PIA's for BC Services Card

On the advice of Matt, please would you open 2 new files for the attached DRAFT PIAs.

These documents will be further edited over the next 2 - 3 weeks to reflect new information from the Systems Integrator regarding security and privacy architectures for the BC Services Card solution.

At this point, the overall Conceptual PIA does not reflect the sections of the acts and needs further editing for new information.



The PIA for the PHN in the magstripe on the combined Drivers' Licence and BC Services Card is very focussed to cover the disclosure of this data element to agencies outside of the healthcare points of service.

If you have any questions, please let me know.

Thanks you.

Regards

**Derek Laine Farrell MCPM, DMS(MA), CMC, ISP**

**Transformation Project Manager**

Business Management Office

Health Sector IM/IT Division

**Ministry of Health**

: 5th Floor, 1483 Douglas St. Victoria, BC, V8W 3C8

: (250) 952-6121 : (250) 952-6084

 : [Derek.LaineFarrell@gov.bc.ca](mailto:Derek.LaineFarrell@gov.bc.ca)



**Please consider the environment before you print**

**From:** [Keay, Liz HLTH:EX](#)  
**To:** [Ball, Leila M HLTH:EX](#); [Thambirajah, Natasha HLTH:EX](#);  
[Gale, Catherine HLTH:EX](#); [Lock, Gwen HLTH:EX](#); [Laine Farrell, Derek HLTH:EX](#);  
**cc:** [Madden, Ken HLTH:EX](#); [Dunlop, Heather L HLTH:EX](#); [Schmidt, Tracee HLTH:EX](#); [Malovec, Anita VSA:EX](#);  
**Subject:** EMPI PIA  
**Date:** Tuesday, September 25, 2012 2:57:16 PM  
**Attachments:** [2012 09 24 DraftLCTZ EMPI PIA TDavis \(am\) \(2\)ek Sept 24.docx](#)

---

Hi there I have a few more comments with Anita's and Tristan's....marked with NEW or bold font...  
...please get your comments back to me and I will forward on. the part vii is quite non existent...  
Thanks

**Elizabeth Keay**

Sr Policy Analyst | Information Privacy & Legislation | Health Information Privacy, Security & Legislation Branch | Ministry of Health  
3<sup>rd</sup> Floor – 1483 Douglas St | Victoria BC V8W 3K4  
email: [liz.keay@gov.bc.ca](mailto:liz.keay@gov.bc.ca) | ph: 250-387-1290 | fax:250-356-2530

# PRIVACY IMPACT ASSESSMENT (Draft Sept 285)

## I BASIC INFORMATION - BC Service Card Identity Fraud Management

### 1. Ministry/Public Body and Program Area.

Ministry	Ministry of Citizen Services and Open Government (CITZ), Ministry of Health (MoH), Insurance Corporation of British Columbia (ICBC)
Division	
Branch/Section	
Initiative Title	BC Services Card - Identity Fraud Management

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Charmaine Lowe
Branch/Section	<del>Knowledge and Information Services</del> Legislation, Privacy and Policy
Phone Number	250 356 2507
E-Mail	<a href="mailto:Charmaine.Lowe@gov.bc.ca">Charmaine.Lowe@gov.bc.ca</a>

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

[This fraud strategy is a part of the BC Services Card Integrated Program. For a full discussion of the BCSC Integrated Program, please refer to the PIAs for MOH, CITZ and ICBC's involvement respectively, cited below in section 6 of Part I of this PIA.](#)

#### Background:

On November 30, 2012, MOH, CITZ, and ICBC will launch a new identity card for BC residents called the BC Services Card (BCSC). The BCSC will be rolled out to residents over 5 years and will initially be launched as a replacement for the BC Medical Services Plan (MSP) CareCard. With the goal of enhancing accountability in the management of the health benefits system within British Columbia and reducing opportunity for consumer fraud, there will be ~~a~~ new requirements for MSP enrollees to prove identity and to renew enrolment periodically, these requirements will be in addition to the existing requirement to prove residency in order to qualify for MSP benefits and obtain a BCSC.

The new card will be available in the following formats:

1. BCSC with a photo and PHN, combined with a BC driver's licence (Combined Card)
2. BCSC with a photo and PHN (Standalone Photo Card)
3. BCSC without a photo and with a PHN (Non-Photo Card)

~~For a full discussion of the BCSC, please refer to the PIAs for MOH, CITZ and ICBC's involvement respectively, cited below in section 6 of Part I of this PIA.~~

#### Fraud Objectives:

The high-level objectives of the BCSC Program that will be addressed in this PIA will be:

- Leverage existing ICBC front counter and investigations services for the purposes of establishing identity for issuance of the BC Services ~~photo~~ ~~Cacard~~;
- Ensuring the delivery of government services to the right person;
- Reduce consumer fraud resulting from card misuse; and,
- Reduce identity theft resulting from card misuse.

MOH	ICBC	CITZ
<ul style="list-style-type: none"> <li>•MSP program management</li> <li>•Reduce potential for health care system fraud</li> <li>•Reduce potential for identity fraud BCSC phot and non photo card</li> </ul>	<ul style="list-style-type: none"> <li>•Driver licensing program management</li> <li>•Reduce potential for Identity Fraudfor BCSC photo card</li> </ul>	<ul style="list-style-type: none"> <li>•Establishment of a corporate identity managment system</li> <li>•Reduce potential for BC Services Card related Identity Fraud</li> </ul>

#### **Fraud and Investigation Integration:**

MOH and ICBC have existing [legislation](#), policies, business processes and functions in place for investigation activities within their respective organizations. This PIA will outline the fraud related integration points of the three organizations as needed for investigating fraud within the BCSC program.

#### **Points of Integration**

The common points of integration include:

1. Identity proofing (Undertaken by ICBC for Photo- and Combined BCSCs, communicated to MOH and CITZ.)
2. Identity fraud detection and investigation: information needs to be shared among the Project Partners to achieve a coordinated stance against fraud, but protect the privacy rights of the individual. For instance, ICBC is a partner in identity fraud detection and investigation related to the issuance of all photo BCSCs as well as post-issuance identity fraud, just as MOH is a partner in detecting identity fraud related to non-photo cards [and stand alone photo cards where the applicant is not known to ICBC<sup>1</sup>](#), as well as identity fraud detected post-issuance. If a case of identity fraud is confirmed, the findings need to be communicated to partner organizations, including CITZ, who is a partner in managing and repairing corporate identity information based on the outcomes of an identity fraud investigation.
3. Identity Record Reconciliation (undertaken by each partner organization following outcome of investigation – may include cancelation of MSP benefits coverage, revocation of any type of BCSC, cleanup of accounts and related histories, identity repair and communication to involved parties).

		*Yes	No
<b>(a)</b>	Does this PIA involve a common or integrated program/activity (as defined in the FOIPP Act)? and	X	
	Is the common or integrated program/activity confirmed by the written requirements set out in the regulation?	X	
<b>(b)</b>	Does this PIA involve a data-linking initiative (as defined in the FOIPP Act)?		X

<sup>1</sup> MoH will only be investigating the potential for identity fraud for stand alone photo cards where the applicant is not known to ICBC in the initial phase of the program; later that role will shift to ICBC.

If yes, please ensure you have notified the Office of the Information and Privacy Commissioner at an early stage of development of the initiative pursuant to section 69 (5.5) of the FOIPP Act.

**4. Purpose/Objectives of the initiative (if statutory, provide citation).**

The purpose of this PIA is to assess the integrated corporate strategy for BCSC identity fraud detection, investigations and reporting requirements for the MOH, ICBC, and CITZ. This PIA will outline the personal information exchanged in order to manage identity fraud related to the BCSC. The PIA will address the BCSC Program's plans for identity fraud management in the contexts of issuance and post-issuance of the BCSC.

**5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Potential impacts of the BCSC Fraud Management program will include, most centrally, the prevention or detection of persons committing identity-, or health care system ~~related~~-fraud related to the BCSC. The following is a non-exhaustive list of examples of identity fraud/~~identity theft~~, and ~~p~~Program-specific fraud or misuse ~~is outside the scope of this PIA~~. (See Appendix A for examples of program related fraud/misuse.):

**Identity fraud ~~and identity theft~~:**

1. ~~An individual who applies for BCSC using stolen or counterfeit identification.~~
2. ~~Using or creating a counterfeit BCSC.~~
3. An individual who borrows a BCSC with the cardholder's knowledge.
4. An individual who steals a BCSC in circumstances that give rise to a reasonable inference that the information was intended to be used to commit an indictable offence including fraud or deceit.
5. An individual who lends their BCSC to an underage person to enable the underage person to enter a place where liquor is sold.
6. An individual who gives their BCSC to someone who is not a Medical Services Plan (MSP) beneficiary in order for the non-beneficiary to obtain a benefit (e.g. card sharing).
7. Obtaining a BCSC in someone else's name and then using that card to build up a fictitious identity to commit other fraud or to obtain government benefits and/or services.
8. An individual who uses the BCSC of a deceased individual.
9. ~~An individual who applies for BCSC using counterfeit identification.~~
10. ~~Using or creating a counterfeit BCSC.~~
- 11.

S15

It is also possible that an individual who has not committed an act of identity ~~theft or~~ fraud may be suspected of such. This risk is mitigated by the appropriate sharing of personal information as necessary, and outlined below.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

"The BCSC Program" PIA; ~~October 2012~~~~July 19, 2012~~; ~~LCTZ~~~~CITZ~~  
"BC Services Card" PIA; ~~July 19, October 2012-2012~~; ICBC  
"BC Services Card – Privacy & Security" ~~July 19, 2012~~~~October 2012~~; MOH

**IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO X. SIGNATURES.**

**\*\*IMPORTANT NOTE:** The FOIPP Act defines personal information as "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted.

## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

The elements of personal information that may be collected as a part of managing identity fraud may include:

*Personal identity and contact information:*

- Name ~~(and list of other or previous names where applicable)~~
- Photo
- PHN
- Birth date
- Sex
- Addresses (and type)
- List of other or previous names (where applicable)
- ID Proofing Reference Number

*Card Information:*

- ICBC Client number
- Card serial Number
- Card Type
- Card issue Date
- Card expiry Date
- Primary ID Docs ~~(copy)~~
- Secondary ID Docs ~~(copy)~~
- Card Production status and timestamp of event (One of: Fraud Hold; Production Success; Cancelled or Destroyed)

*Investigative Findings and Results:*

- Summary of findings
- Reasons for hold
- Hold Status
- Card status (printed and held, destroyed, released or permanently out of circulation)
- Summary of the MOH IU report with outcome of identity review
- Photo

*Notices:*

- Notice - remove hold (and reasons for hold removal)
- Notice – retain Hold
- Notice – do not issue card
- Notice of change in MSP eligibility status

Further to the above detailed information, other personal information may be exchanged on a case-by-case basis as is necessary to conduct identity fraud investigations and will be done only in accordance with the FOIPP Act.

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

### III COLLECTIONS, USES AND DISCLOSURES OF PERSONAL INFORMATION

The following exchanges of personal information represent the expected fraud use-cases in which personal information will need to be shared. The table below details each exchange along with the accompanying authorities (for collection, use and disclosure) under which the exchange is taking place.

#### Information Sharing – Fraud Detection and Investigation

Exchange	Elements	Authority
Suspected fraud at ICBC counter – client unknown to ICBC <sup>2</sup> applying for standalone photo card. (no BCSC has been printed)		
1A. ICBC to MoH  ICBC provides information to MoH to investigate suspected fraud.	Name PHN Birth date Sex Addresses (and type) ICBC Client number Primary ID Docs (copy) Secondary ID Docs (copy)  ICBC summary of reasons for hold	Disclosure – ICBC to MoH FOIPPA s.33.2(d)  Collection – MoH from ICBC FOIPPA s.26(c)/27(1)(b)  Use – MoH FOIPPA s.32(c)
1B. MoH to ICBC  <u>Applicant verified</u> – MoH performs investigation and determines no fraud found – directs ICBC to remove hold	Summary of the MOH IU report with outcome of identity review  Notice - remove hold (and reasons for hold removal)  Applicant Name ICBC Client number	Disclosure – MoH to ICBC FOIPPA 33.2(d)  Collection – ICBC from MoH FOIPPA s.26(c)/27(1)(b)  Use – ICBC FOIPPA s.32(c)
1C. MoH to ICBC  <u>Fraud confirmed</u> – MoH performs investigation and determines fraud found - no card to be issued.	Summary of the MOH IU report with outcome of identity review  Notice – retain Hold Notice – do not issue card  Applicant Name Birth date Sex ICBC Client number PHN  Addresses (and type) List of other or previous names - (where applicable)	Disclosure – MoH to ICBC FOIPPA 33.2(d)  Collection – ICBC from MoH FOIPPA s.26(c)/27(1)(b)  Use - ICBC FOIPPA s.32(c)  Disclosure – MoH to ICBC FOIPPA s.33.2(i) (law enforcement)  Collection – ICBC from MoH FOIPPA s.26(b)/s.27(1)(c)(iv)  Use – FOIPPA s.32(c) Information provided for ICBC to conduct investigation into possible fraud (unrelated to BCSC)

<sup>2</sup> Unknown to ICBC means they do not have a BC DL, a BCID or a BCSC

Suspected Fraud at ICBC counter - Individual is known to ICBC and applying for standalone card or is (new or known to ICBC) applying for combo card. BCSC is printed and held as evidence.

2A. ICBC to CITZ  ICBC places hold on card and investigates suspected fraud.	<p><del>Card status (printed and held, destroyed, released or permanently out of circulation)</del> Card Production status (One of: Fraud Hold; Production Success; Cancelled or Destroyed)</p> <p>Applicant Name Birth Date Sex Card serial Number ICBC Client number</p>	<p>Disclosure – ICBC to <del>CITZ</del>CITZ FOIPPA s.33.2(d)</p> <p>Collection – <del>CITZ</del>CITZ from ICBC FOIPPA s.26(c)/27(1)(b)</p> <p>Use FOIPPA s32(c)</p>
2B. ICBC to MoH  ICBC places hold on card and investigates suspected fraud.	<p><del>Card status (printed and held, destroyed, released or permanently out of circulation)</del> Card Production status (One of: Fraud Hold; Production Success; Cancelled or Destroyed)</p> <p>Reasons for hold</p> <p>Applicant Name Birth Date PHN Sex Card serial Number ICBC Client number</p> <p>*Summary of hold provided on a quarterly basis</p>	<p>Disclosure – ICBC to MoH FOIPPA s.33.2(d)</p> <p>Collection – MoH from ICBC FOIPPA s.26(c)/27(1)(b)</p> <p>Use – MoH FOIPPA s.32(c)</p>
2C. ICBC to <del>CITZ</del> CITZ  <u>Applicant verified</u> - Fraud Hold removed	<p>Card Production status (One of: Fraud Hold; Production Success; Cancelled or Destroyed) <del>Card status (printed and held, destroyed, released or permanently out of circulation)</del></p> <p>Applicant Name Birth Date Sex Card Serial Number ICBC Client number</p>	<p>Disclosure – ICBC to <del>CITZ</del>CITZ FOIPPA s.33.2(d)</p> <p>Collection – <del>CITZ</del>CITZ from ICBC FOIPPA s.26(c)/27(1)(b)</p> <p>Use FOIPPA s32(c)</p>
2D. ICBC to MoH  <u>Applicant verified</u> - Fraud Hold removed	<p>Card Production status (One of: Fraud Hold; Production Success; Cancelled or Destroyed) <del>Card status (printed and held, destroyed, released or permanently out of circulation)</del></p>	<p>Disclosure – ICBC to MoH FOIPPA s.33.2(d)</p> <p>Collection – MoH from ICBC FOIPPA s.26(c)/27(1)(b)</p> <p>Use – MoH</p>

Formatted: No bullets or numbering



	<p><del>circulation)</del></p> <p>Applicant Name Birth Date Sex PHN ICBC Client number</p>	FOIPPA s.32(c)
2E. ICBC to MoH	<p>Hold Status</p> <p>Card Production status (One of: Fraud Hold; Production Success; Cancelled or Destroyed) <del>Card status (printed and held, destroyed, released or permanently out of circulation)</del></p> <p>Applicant Name PHN Birth date Sex Card Type Card issue Date Card expiry Date ICBC Client number Address (and type)</p>	<p>Disclosure – ICBC to MoH FOIPPA s.33.2(d)</p> <p>Collection – MoH from ICBC FOIPPA s.26(c)/27(1)(b)</p> <p>Use – MoH FOIPPA s.33.2(c)</p>
	<p>Photo List of other or previous names – (where applicable)</p>	<p>Disclosure – ICBC to MoH FOIPPA s.33.2(i) (law enforcement)</p> <p>Collection – MoH from ICBC FOIPPA s.26(b)/s.27(1)(c)(iv)</p> <p>Use – FOIPPA s.32(c) Information provided for MoH to conduct investigation into possible MSP fraud</p>
2F. ICBC to <del>CTZCITZ</del>	<p>Hold Status</p> <p>Card Production status (One of: Fraud Hold; Production Success; Cancelled or Destroyed) <del>Card status (printed and held, destroyed, released or permanently out of circulation)</del></p> <p>Applicant Name Birth Date Sex Card serial Number ICBC Client number</p> <p>Card Type Card issue date Card expiry date ICBC Client number</p>	<p>Disclosure – ICBC to <del>CTZCITZ</del> FOIPPA s.33.2(d)</p> <p>Collection – <del>CTZCITZ</del> from ICBC FOIPPA s.26(c)/27(1)(b)</p> <p>Use FOIPPA s32(c)</p>
	<p><u>Fraud confirmed</u></p>	

Fraud Confirmed post BCSC issuance (photo and non-photo)		
3A. MoH to ICBC and <del>CITZ</del> CITZ	Summary of findings Notice of change in MSP eligibility status Applicant Name Birth date Sex Address (and type) List of other or previous names - (where applicable)  Card Type Card issue Date Card expiry Date ICBC Client number	Disclosure – MoH to ICBC & <del>CITZ</del> CITZ FOIPPA s.33.2(d)  Collection – ICBC & <del>CITZ</del> CITZ from MoH FOIPPA s.26(c)/27(1)(b)  Use FOIPPA s32(c)
<p><u>Identity Fraud confirmed by MoH</u></p> <p>(Identity fraud found through point of service, or investigation or audit ect.)</p>		
<p>3B</p> <p><u>Identity Fraud confirmed by CITZ or ICBC</u></p> <p>The issue of identity fraud post card issuance, suspected or confirmed, will be included as part of the integrated program. However, the exchanges of personal information between the parties will be done so on a case by case basis in accordance with the law enforcement authorities in the FOIPP Act (section 26(b), 27(1)(c)(iv), 32(c) and 33.2(i).</p>		

2) **Systematic or Repetitious Disclosure/Exchanges?**

		Yes	No	n/a
i.	Do the disclosures of personal information under section 33.2 occur on a regular basis?	X		
ii.	Has an Information Sharing Agreement been completed for these disclosures/exchanges?	X		
iii.	Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ?		X	

**Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.**

3) **Research or Statistical Purposes (Section 35)**

	Yes	No	n/a
Has a researcher requested access to personal information in an identifiable form for research purposes?		X	

**If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact Knowledge and Information Services for assistance.**

**Please note: Research using personal information may only be conducted if it meets all of the terms of section 35.**

4) **Archival or Historical Purposes (Section 36)**

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

	Yes	No	n/a
(a) The disclosure would not be an unreasonable invasion of personal privacy under section 22		X	
(b) The disclosure is for historical research and is in accordance with section 35 (research agreements)		X	
(c) The information is about someone who has been dead for 20 or more years		X	
(d) The information is in a record that has been in existence for 100 or more years		X	

*If you have not answered "yes" to any of the above authorizations for disclosure you do not have the authority to disclose personal information. If you have any questions or require clarification, please contact Knowledge and Information Services.*

## VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION (Section 28 and section 29 of the FOIPP Act)

If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

	Yes	No	n/a
1. Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2. Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3. If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>			
Policy/procedure:	<a href="#">Information Access Operations</a>		
Contact person:	<a href="#">Kathleen Ward</a>		
Phone number:	<a href="#">250 387 9807</a>		
<b>Additional details as required</b>			
ICBC, MOH and CITZ will ensure that any decisions regarding an individual (e.g. cancelling MSP coverage, destroying a card, etc) will be done with only the most up-to-date and complete information available. For a more detailed discussion on the access to, retention or, or correction and annotation of personal information, please review each respective partners' PIA for the greater BCSC Program <a href="#">cited above in section 6 of Part I of this PIA</a> .			

*If any of the questions above have been answered "no", please contact Knowledge and Information Services for further clarification.*

## VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the FOIPP Act)

**Note:** For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the [Signatures](#) section.

For PIAs that do not involve systems initiatives, this section should be completed by the program area completing the PIA. In this case, the signature of the systems representative is not required.

**Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.**

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	Information Security Policy		
	Contact person:	Ian Bailey		
	Phone number:	250 387 8053		
	<b>Additional details as required</b> For a more detailed discussion on the technical and physical security, or the policies and procedures in place to ensure the security of the personal information collected, used and disclosed as a part of the BCSC Fraud Management program, please review each partners' respective PIA for the greater BCSC Program <a href="#">cited above in section 6 of Part I of this PIA.</a>			
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?	X		
	<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>			
7.	Does the audit identify inappropriate accesses to the system?	X		
	<b>Additional details</b>			

***If any of the questions above have been answered "no", please contact your Ministry's Security Officer. If you have any questions or require clarification please contact Knowledge and Information Services.***

## VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION cont'd

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

		Yes	No	n/a
	Will the information be stored or accessed only in Canada?	X		

**Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

		Yes	No	n/a
(a)	Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?		X	
	<b>Please explain</b>			
(b)	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?		X	
	<b>Please explain</b>			
(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
	<b>Please explain</b>			

***If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact Knowledge and Information Services.***

## VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

**If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?	X		

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your Records Officer.***

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document***

***Disposal Act.*** Please consult with your Records Officer to initiate the records scheduling process.

**X      SIGNATURES**

**PUBLIC BODY APPROVAL:**

Charmaine Lowe  
Executive Director, Knowledge and  
Information Services Legislation Privacy  
and Policy Branch  
Ministry of Labour, Citizens Services,  
and Open Government

Signature

Date

Dave Nikolejsin  
Chief Information Officer Assistant  
~~Deputy Minister or Equivalent~~  
Ministry of Citizen Services and Open  
Government

Signature

Date

Lindsay Kislock  
Assistant Deputy Minister ~~or Equivalent~~  
Ministry of Health

Signature

Date

Fred Hess  
VP, Driver Licensing ~~Assistant Deputy  
Minister or Equivalent~~  
Insurance Corporation of British  
Columbia

Signature

Date



## Appendix A

### Examples of Program Related Fraud/Misuse outside the scope of this PIA:

1. An individual who uses their BCSC when they have ceased to be a resident.
2. An individual with a class five license who operates a class two vehicle.
3. An individual who continues to operate their vehicle after failing to complete a required medical exam to obtain or renew a BCSC.
4. An individual who drives an uninsured vehicle.
5. An individual altering a medical requisition forms (a laboratory form for example) and obtaining services that are not medically required.
6. An individual misrepresenting the nature and extent of an illness in order to obtain hospital services and painkillers at hospitals.
7. An individual who uses their BCSC to multi-doctor and obtain multiple prescriptions for controlled medications.
8. An individual attempting to use a BCSC after restrictions have been placed on the account by the Medical Services Commission.

**From:** [Pearce, Alison HLTH:EX](#)  
**To:** [Dunlop, Heather L HLTH:EX](#); [Madden, Ken HLTH:EX](#); [Lowe, Charmaine CITZ:EX](#); [Keay, Liz HLTH:EX](#); [Gale, Catherine HLTH:EX](#);  
**cc:** [Thambirajah, Natasha HLTH:EX](#);  
**Subject:** Fw: Fraud Operational Meeting - Thursday, August 2 Minutes  
**Date:** Friday, August 3, 2012 6:24:07 PM

---

I know from the PIA and ISA perspective, you all have been anticipating the information flows and new business processes that we hope to implement for fraud management for the BC Services Card by November 30, 2012. Below are the change requests that we need to put through to meet that goal. They describe the new business processes.

We also have a fraud strategy and new business rules that we can share with you shortly. The edits should be completed by Tuesday, August 8.

Other outstanding authorities that we are trying to create include:

- authority for ICBC to retain (seize) fraudulent documents presented for a BC Services card;
- authority for ICBC to investigate fraud committed at the front counter to get a BC Services Card.

We are also hoping to satisfy the OIPC that ICBC's use of facial recognition software to search their image database to find fraud is acceptable for purposes of issuing a BC Services Card.

Hope this helps! Happy to engage with you on this topic in the next few weeks.

Alison

---

**From:** Pearce, Alison HLTH:EX  
**Sent:** Friday, August 03, 2012 05:55 PM  
**To:** 'Shotton, Ben' <Ben.Shotton@icbc.com>; 'Pamela Atkinson' <pamela.atkinson@maximuscanada.ca>; 'Laura Smallwood(C)' <laura.smallwood@maximusbc.ca>; XT:HLTH TIMFROST@CA.IBM.COM; Van der Merwe, Sam ICBC:EX; Moss, Jeremy LCTZ:EX; Thelisma, Marie A HLTH:EX  
**Cc:** Boden, Darren HLTH:EX; Ball, Leila M HLTH:EX; Thambirajah, Natasha HLTH:EX; 'David Lawson' <david.lawson@ca.ibm.com>  
**Subject:** Fraud Operational Meeting - Thursday, August 2 Minutes

Summary of our conversation on Change Requests for November 30, 2012:

1. ICBC SIU will notify HIBC when a card that has been printed and held for an investigation is subsequently released (fraud is not concluded).
  - Manual
  - Approximately 300/year
2. ICBC SIU will notify LCTZ manually when:
  - a. A card is printed and held for an investigation.
  - b. When card that has been printed and held for an investigation is filed indefinitely (fraud is concluded).
3. ICBC SIU will notify HLTH IU when a fraud investigation has concluded, fraud is found and issuance of a BC Services Card is denied.

LCTZ and HLTH will raise a further change request for implementation post-November 30, 2012:

4. ICBC will investigate a person applying for a standalone BC Services Card who is unknown to ICBC.

Please provide feedback by Wednesday, August 8<sup>th</sup>. The next step is to begin to draft necessary Change Requests – please consider impacts of the above noted changes to your respective agencies and provide feedback to me.

Have a nice long weekend everyone. Great work. 😊  
Alison

**From:** [Schmidt, Tracee HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX](#); [Van Den Bulk, Jeannette CITZ:EX](#);  
**Subject:** FW: Legislative authority model

---

These are the people who are responsible for doing PIAs at Health so would be helpful if you could come to this meeting with me. Sorry about the last minute notice but just found out this afternoon that the purpose of this meeting was to educate the people doing the PIA at Health. This would be a good opportunity to ensure our PIA work is aligned.

-----Original Appointment-----

From: Ito, Miwa HLTH:EX On Behalf Of Schmidt, Tracee HLTH:EX  
Sent: Tue, February 28, 2012 9:54 AM  
To: Schmidt, Tracee HLTH:EX; White, Robyn S HLTH:EX; Lowe, Charmaine CITZ:EX; Dunlop, Heather HLTH:EX; Keay, Liz HLTH:EX  
Subject: Legislative authority model  
When: Fri, March 2, 2012 10:00 AM-11:00 AM (GMT-08:00) Pacific Time (US & Canada).  
Where: HLTH R BMO Meeting Room 5th Floor 1483 Douglas St HLTH:EX

Hi Robyn/Charmaine,

I am writing to request a walk through of the legislative authority for the purposes of the PIA. Heather Dunlop and her staff, Liz Keay, are the leads and have identified the legislative authority as a critical component for their work. If there is material you could provide in advance, that would be very helpful for focussing this discussion. I understand how busy you are and appreciate your assistance on this critical path deliverable.

Thank you

Tracee

**From:** [Armstrong, Wendy CITZ:EX](#)  
**To:** [Elliot, Nathan CITZ:EX](#); [Padgett, David CITZ:EX](#);  
[EX](#);  
**cc:** [Thambirajah, Natasha HLTH:EX](#);  
**Subject:** FW: STRA iSmart tool  
**Date:** Monday, December 12, 2011 12:59:58 PM

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I'm recalling some questions around Security Threat and Risk Assessments (STRA) came up during last week's PIA session(s). The most current information is at  
S15 any questions relating to  
the how-to-do, when-to-do or whatever-is a STRA should be referred to ministry  
MISOs, who you'll find on a usually-current list at S15  
S15

And now you know as much as I do. Recommend you bookmark both sites, as they take can take a while to locate.  
W

~~~~~  
Wendy Armstrong  
Knowledge and Information Services  
Office of the Chief Information Officer  
Ministry of Labour, Citizens' Services and Open Government  
**NEW Tel: 250 356-0818** Fax: 250-356-1182  
E-mail: [Wendy.Armstrong@gov.bc.ca](mailto:Wendy.Armstrong@gov.bc.ca)

**From:** [Natasha Thambirajah](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** Fwd: FW: Scanning of ID in bars  
**Date:** Friday, December 2, 2011 9:52:28 AM  
**Attachments:** [20090821161930.pdf](#)

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----- Forwarded message -----

From: **Thambirajah, Natasha HLTH:EX** <[Natasha.Thambirajah@gov.bc.ca](mailto:Natasha.Thambirajah@gov.bc.ca)>

Date: Tue, Nov 29, 2011 at 4:26 PM

Subject: FW: Scanning of ID in bars

To: "Blenner-Hassett, Marnie HLTH:EX" <[Marnie.Blenner-Hassett@gov.bc.ca](mailto:Marnie.Blenner-Hassett@gov.bc.ca)>, "Boulton, Michael HLTH:EX" <[Michael.Boulton@gov.bc.ca](mailto:Michael.Boulton@gov.bc.ca)>

Cc: "Moss, Jeremy HLTH:EX" <[Jeremy.Moss@gov.bc.ca](mailto:Jeremy.Moss@gov.bc.ca)>

Note how EnterSafe is cited ... just a bit of additional info for any future mag stripe work.

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**Natasha Thambirajah**

Ministry of Health, Province of British Columbia

T: [\(250\) 952 7452](tel:(250)9527452) | F: [\(250\) 952-6084](tel:(250)9526084)

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**From:** Ridley, Sheena HSD:EX  
**Sent:** Wednesday, September 29, 2010 2:20 PM  
**To:** Thambirajah, Natasha HLTH:EX  
**Subject:** FW: Scanning of ID in bars

Hey- S22 Here's a synopsis of the privacy commissioner's ruling. Under PIPA there's also a third way to use id scanning devices and thats under the direction of LCLB (e.g. when directed to do so by law) and its terms and conditions (see below).

Hope this helps,

Sheena

## DRAFT CONCEPTUAL PRIVACY IMPACT ASSESSMENT

### I BASIC INFORMATION - New or Existing Program, System or Legislation

#### 1. Ministry/Public Body and Program Area.

|                |                                                        |
|----------------|--------------------------------------------------------|
| Ministry       | Labour, Citizens' Services and Open Government (LCITZ) |
| Division       | Office of the Chief Information Officer (OCIO)         |
| Branch/Section | Knowledge and Information Services                     |
| Program        | Identity Information Management (IDIM)                 |

#### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

|                |                                                                        |
|----------------|------------------------------------------------------------------------|
| Name, Title    | Charmaine Lowe                                                         |
| Branch/Section | Knowledge and Information Services                                     |
| Phone Number   | 250-356-2507                                                           |
| E-Mail         | <a href="mailto:Charmaine.Lowe@gov.bc.ca">Charmaine.Lowe@gov.bc.ca</a> |

#### 3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

### BACKGROUND

The Province of British Columbia is undergoing a transformation towards a citizen-centered service model, as set out *Citizens @ the Centre – B.C. Government 2.0* ([http://www.gov.bc.ca/citz/citizens\\_engagement/gov20.pdf](http://www.gov.bc.ca/citz/citizens_engagement/gov20.pdf)). At the highest level, the new model is about enabling the right people to gain access to the right information at the right time for the right purpose, while ensuring and enhancing the privacy of citizens.

Identity information management (IDIM) is key to realizing the vision for citizen-centered service delivery and information sharing across not only core government, but the broader public sector and its private sector partners. "Identity Information" is considered here to be the set of attributes used to describe a person and it may be used to distinguish a unique and particular individual or organization. It is considered to be a certain type of information, in the same way that geographic information, financial information, and health information are also certain types of information. IDIM is concerned to be a set of principles, practices, policies, processes and procedures that are used within an organization to manage identity information and realize desired outcomes concerning identity.

One of the significant elements of the IDIM solution is the use of contactless smartcard technology to enable citizens to authenticate themselves and obtain identity claims about themselves to use for accessing public services. A BC Services Card will be introduced to this end.

The BC Services Card project is a joint initiative between the LCITZ, the Ministry of Health (MoH), the Ministry of Public Safety and Solicitor General and the Insurance Corporation of British Columbia. MoH has drafted a separate PIA on the BC Service Card project. It is therefore not within the scope of this PIA to cover the whole of the BC Service Card project.



I.

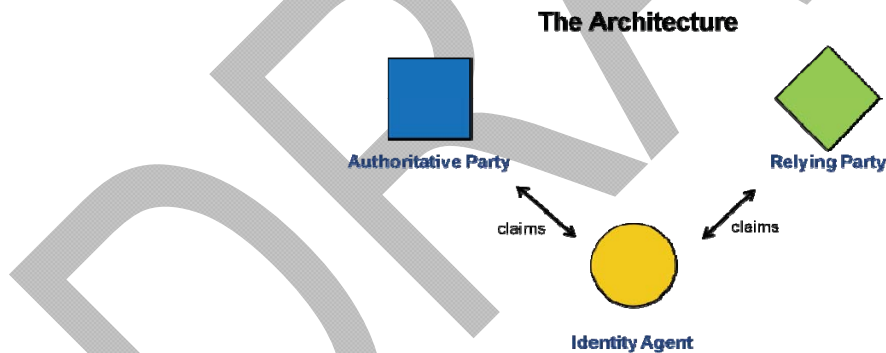
BASIC INFORMATION cont'd

This PIA is conceptual in nature. Government expects to conduct further PIAs as the IDIM initiative moves forward through the design and implementation stages.

## BASIC CONCEPTS

The IDIM program will rely upon a claims-based approach and user-centric architecture where identity information flows through the user at the request of the user. This approach involves three key actors:

- Authoritative Party:**  
An authoritative party is an organization (or person) that is trusted to be a source of the identity attributes. The authoritative party may be recognized because of legislation, a government policy, a contract, or naturally as in an organization being recognized as an authority for its employees. Authoritative parties may issue credentials ("credential" is also defined below).
- Relying Party:**  
A relying party is any electronic service provider that requests claims from one or more authoritative parties. The relying party controls access to a resource or service and relies on an authoritative party to provide identity assurance and identity related attributes about a user or subject ("user" and "subject" are also defined below).
- Identity Agent:**  
In the user centric architecture, the Identity Agent, is software that acts on behalf of the user, usually in combination with a web-browser or other user client software. Microsoft Cardspace is an example of an Identity Agent. The Identity Agent manages the movement of claims from an authoritative party to a relying party and provides user experience, security, and privacy functions



It is also important to distinguish the "user", "subject", "client" and "provider":

- The *User* is the person attempting to, or that is, interacting with an information system provided by a relying party.
- The *Subject* is the person whose information is recorded in, and administrated by, an information system provided by a relying party.
- The *Client* is the person that a program or service is intended to serve.
- The *Provider* is a person who is not the client, but instead is someone who participates in the delivery of the service in which the client is involved.

Some other basic concepts central to the IDIM solution are the following:

**Business Role:**

Users may be associated with one or more “business roles” which describe the business function of the user. For each business role there is an Authoritative Party that manages the definition and use of the business role (examples: health care provider, teacher, social case worker).

**Credential:**

A physical or electronic object (or identifier) that is issued to, or associated with, one party by another party and attests to the truth of certain stated facts and/or confers a qualification, competence, status, clearance or privilege. Identity credentials can be cards, like a driver’s license or smart card; documents like a passport; or, in the context of digital identities, a User ID and password or digital certificate.

**Identity Claim:**

An assertion of the truth of something which pertains to a person’s identity. An identity claim could convey a single attribute such as an identifier (e.g. a student number) or it could convey that a person is part of a certain group or has certain entitlements (e.g. I am over 18, I am a company employee). A set of identity claims could provide sufficient identity attributes (e.g. name, date of birth address) to permit the identification of a person.

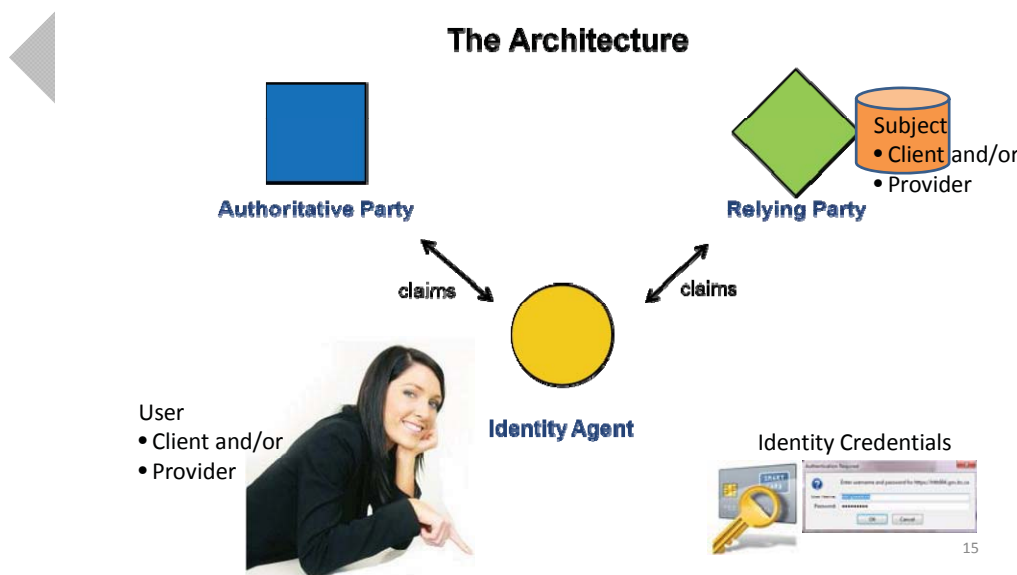
**Identity Context:**

The environment or circumstances in which identity information is communicated and perceived. Individuals operate in multiple identity contexts (e.g., legal, social, employment, business, pseudonymous) and identify themselves differently based on the context.

**Security Token:**

A package of data that contains claims that typically are digitally signed and encrypted to ensure security. The token is used to prove identity to obtain access to a resource or service. The token is usually in the form of an XML text document called Security Assertions Markup Language (or SAML).

## Putting It All Together



## GUIDING POLICY PRINCIPLES

Further to the OCIO's document "Trust and Identity Management" and the work done by the Pan-Canadian Identity Management Task Force, the following set of principles will guide the development of the IDIM program (see [http://www.cio.gov.bc.ca/local/cio/idim/documents/trust\\_id\\_mgt\\_report.pdf](http://www.cio.gov.bc.ca/local/cio/idim/documents/trust_id_mgt_report.pdf)):

*Principle 1.*

Requirements and uses should be justifiable and proportionate to the task.

*Principle 2.*

Clients should have choice, consent and control over their identity credentials and the uses to which they are put.

*Principle 3.*

Use of identity information should be limited to a specific purpose and to justifiable parties.

*Principle 4.*

Processes should be client-focused and provide a consistent experience.

*Principle 5.*

An IDIM environment should recognize a diversity of identity contexts and systems.

*Principle 6.*

IDIM should be provided in a trusted and secure environment.

*Principle 7*

All IDIM activities should be transparent and accountable.

*Principle 8.*

IDIM processes and methods should provide an enduring solution, which is technologically neutral, flexible and scalable.

## LEGISLATIVE AUTHORITY

Bill 3, the *Freedom of Information and Protection of Privacy Amendment Act, 2011*, received Royal Assent on November 14, 2011. Among other things, the amendments enable the delivery of online services to citizens by establishing the legislative foundation for provincial IDIM services. Generally speaking, the amendments:

- define "personal identity information" as "any personal information of a type that is commonly used, alone or in combination with other information, to identify or purport to identify an individual";
- authorize the minister responsible for the FOIPP Act to designate a public body as a "provincial identity information services provider", which can provide certain services, including identifying individuals and issuing credentials;
- authorize the minister responsible for the FOIPP Act to give directions to a provincial identity information services provider or a public body respecting certain matters, including the type and quantity of personal identity information needed for individuals accessing government services;
- authorize the provincial identity information services provider to collect (directly or indirectly) and disclose personal identity information to provide services; and

- authorize public bodies to collect personal identity information from, and disclose such information to, the provincial identity information services provider to provide services.

The specific new FOIPP Act provisions which are relevant to IDIM, are set out in **Appendix A** (in addition, through Bill 3, consequential amendments were made to the Child, Family and Community Service Act, E-Health Act, Family Maintenance Enforcement Act and Family Relations Act).

## IDENTITY ASSURANCE SERVICES

An important aspect of claims is the level of assurance that a relying party should place in the claims. The other way to look at assurance is the probability that the claim is true. If the entire life cycle of the claim information held by an authoritative party and passed to a relying party is rigorous and well protected then a relying party can have a high level of assurance in a claim and probability is high that the claim is true. By providing the assurance level as a claim, a relying party can then tie access policy to the assurance level.

Identity Assurance Services will be the foundation of the IDIM program. These Identity Assurance Services will collectively manage the identity information of individuals who interact with government and the electronic credentials issued by the Province, across many government programs and services. These services will also authenticate the electronic credentials and provide identity information to relying government programs and services.

The Identity Assurance Services will be developed and operated by Shared Services BC under the direction of the OCIO. The services will also be developed in alignment with the *Identity Information Management Standards Package* available at [http://www.cio.gov.bc.ca/cio/standards/idim\\_standards\\_package/index.page](http://www.cio.gov.bc.ca/cio/standards/idim_standards_package/index.page).

This Package can be divided into four main topic areas:

- Identity Assurance Framework and Standards
- Identity Information Reference Model and Standards;
- Identity Claims Architecture and Standards; and
- Identity Information Management Services and Standards.

There will be four levels of assurance:

- Level 1 - Low Identity Assurance(Unverified Claims);
- Level 2 - Medium Identity Assurance (Validated Claims);
- Level 3 - High Identity Assurance (Substantiated Claims); and
- Level 4 - Very High Identity Assurance (Corroborated Claims).

For more detail on these four assurance levels, refer to the Identity Assurance Standard itself: ([http://www.cio.gov.bc.ca/local/cio/standards/documents/standards/identity\\_assurance\\_standard.pdf](http://www.cio.gov.bc.ca/local/cio/standards/documents/standards/identity_assurance_standard.pdf)).

Government programs and services that currently manage identity information independently will need to transition to this new centralized managed approach, and adapt their systems to rely on the Identity Assurance Services as a source of updated information.

The Identity Assurance Services will be composed of the following four main components (which are described in more detail below):

- 1) Identity Information Service
- 2) Identity Protection Service
- 3) Credential Management Services
- 4) Authentication Services

### **1) IDENTITY INFORMATION SERVICE**

This service manages the registered personal identity information about individuals across government programs that are issued credentials by the Province. It is important to note that this service does not store program-specific information about clients – that information will continue to be stored by government programs and services themselves (as occurs today).

This service will only store the minimum amount of identity information required to serve its function. Programs will not be permitted to store program identifiers of other programs.

The Identity Information Service provides the following high level functions:

- Registers and manages updates to identity information provided by registering organizations and services;
- Shares identity information with relying parties, either during an authentication event, when queried or through the publishing of identity information updates; and.
- Support identity repair and fraud investigation, when needed.

### **2) IDENTITY PROTECTION SERVICE**

This service manages the linking of identity records between IDIM services and participating government programs. The goal is to link identities in a privacy-protecting way, instead of using a universal identifier for individuals across all programs. Commonly, government programs refer to individuals using program-specific identifiers, such as the Personal Health Number (PHN). It is undesirable to share program-specific identifiers across government programs as it allows profiling and tracing of an individual's use of government programs and services across time.

Thus, the Identity Protection Service uses a new approach of using intermediary identifiers between programs; these identifiers have been labelled “directed identifiers” meaning they are specific (directed) between two programs and not usable by an unauthorized program.

This service will act as safe deposit box that programs will use to store encrypted versions of program identifiers. The service will be a “blind store”, in that it will be unable to decrypt or otherwise interpret the identity information stored within it. When one program needs information about a client from another program, it will ask the service to issue a “handle” that represents the client in question. The handle is usable for only a short period of time and cannot be used to profile clients. The handle is passed to the target program, which uses it to retrieve the correct program identifier to look up the requested information. This information is passed back to the requester along with the handle. At no time are the program identifiers exchanged between the programs, thus preventing profiling or the collection of program identifiers.

The Identity Protection Service provides the following high level functions:

- Registers identifiers for identity records in government programs, and links them to known identities within the Identity Information Service (and other IDIM services).
- Translates/resolves identifiers in one government program to another government program to support information sharing between programs about a particular individual.

### **3) CREDENTIAL MANAGEMENT SERVICES**

This set of services manages the issuance and lifecycle of electronic credentials that are issued by the Province. As there are several credential types offered, there is a credential service defined for each type:



I. BASIC INFORMATION cont'd

1. Chip Credential Service – manages the electronic aspect (the chip) of contactless smartcards. The first smartcard will be the BC Services Card, issued to residents of BC, available in three forms:

- photo, standalone, for those registered to identity assurance level 3
- photo, combined with the driver licence, for drivers registered to identity assurance level 3
- non-photo, standalone, for those registered to identity assurance levels 1 or 2

A second smartcard may be a government worker smartcard, issued to employees and contractors for their use to access government internal resources.

[Note: this set of services does not include smartcard production or delivery.]

2. Passcode Credential Service – manages the second factor credential that is paired with the smartcard chip. The passcode is a numeric password, much like a PIN is used with a bank or credit card.
3. BCeID Credential Service – manages the userID / password credential that is currently used for access to government online services.

Each of the above services generally provides the following high level functions:

- Register and manage updates to credential information provided by issuing organizations and services;
- Manage the lifecycle of credentials, such as expiry and revocation; and
- Support authentication processes by validating credentials

#### 4) AUTHENTICATION SERVICES

This set of services manages the process of validating electronic credentials that are issued by the Province. As described within Credential Management Services, there are several credential types offered, thus there are several authentication services defined for each type:

1. Chip / Passcode Authentication Service – verifies the chip of a contactless smartcard with the Chip Credential Service and, if required, verifies the passcode with the Passcode Credential Service. This service will be offered to support two service delivery channels:

- Online – using a smartcard reader attached to or embedded within an individual's computer
- Point of Service – using a smartcard reader embedded within device such as a payment terminal.

2. Chip / Photo Authentication Application – verifies the chip of a contactless smartcard with the Chip Credential Service and presents a digital photograph of the individual for authentication by a counter service agent. The photograph acts as a second factor credential. One or more applications will be developed to work on various payment terminal devices or integrated with a Point of Service system.

3. BCeID Authentication Service – verifies the userID / password with the BCeID Credential Service.

Each service generally provides the following high level functions:

- I. BASIC INFORMATION cont'd
- Prompts for and collects credential information presented by the individual
  - Verifies the credential information with the appropriate credential service
  - Provides an assertion of the identity of the individual back to the requesting service, which may be the relying party or the IDIM Claims Provider service which delivers identity information as claims to the relying party.

## **MORE ON IDENTITY ASSURANCE SERVICES**

Each of the above four main components of the Identity Assurance Services will use a set of Information Registries (databases) to store the identity and credential information. Refer to **Appendix B** for a listing of the key registries.

The Identity Assurance Services will be significantly involved in the sharing of identity information with government programs and services. The services interact with individuals, various registering organizations and services, and relying parties.

Refer to **Appendix C** for a context diagram showing the Identity Assurance Services, the interacting players, and more detail on the key identity information sharing interactions (business processes).

In addition to the Identity Assurance Services, the IDIM program will also offer other registration services, business and professional affiliation information services, access control services, user provisioning services, and identity federation services. Although these services are not included in the scope of the Identity Assurance Services, they are built on top of the foundation created by the Identity Assurance Services.

### **4. Purpose/Objectives of the initiative (if statutory, provide citation).**

Refer to the information under #3 "Background" above.

The potential benefits of the IDIM solution are significant. For the citizen, these include improvements in service delivery, enhanced privacy, and improved client engagement by increasing accessibility and choice while reducing cost.

Moving forward, many other government projects will leverage IDIM, including Integrated Case Management (ICM), Integrated Corrections Operation Network II (ICON II) and eCourts. But IDIM's potential scope is much greater as it is key to realizing the vision for citizen-centered service delivery and information sharing across not only core government, but the broader public sector and its private sector partners.

### **5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Given the magnitude of this initiative (for example, the many entities to be taking part in the long term and types of personal information involved), considerable care is needed regarding privacy. This is especially so given the failure of some other jurisdictions to implement IDIM in a privacy enhanced way. Without careful design and planning, moving to new identification processes will increase, rather than decrease risk.

Some jurisdictions have built centralized, monolithic citizen databases with a single citizen number for each person. These unique identifiers are then threaded through all programs. The ability to share information and coordinate records is greatly simplified, as is the potential to profile citizens. As well, a privacy breach jeopardizes the identity information used to access financial records and other databases. This approach has been rejected by B.C.

Protection of personal information is a high priority for the B.C. government. BC's approach towards

I. BASIC INFORMATION cont'd

IDIM has evolved over the years, and the Province is now positioned to evolve an IDIM solution that can support citizen-centred services as well as a privacy enhanced approach to information sharing to improve service outcomes. Government's identity service must be tightly controlled and monitored to ensure compliance with legislation and policy. The service must prevent unauthorized threading of identifiers from program to program.

The risks associated with any form of IDIM cannot be eliminated entirely. But B.C. is working towards a thoughtful, rational and flexible solution that can not only maintain current privacy protection for citizens but enhance that protection.

The following will be key to maintaining and enhancing privacy for the IDIM solution:

- There are weaknesses in the "paper" identity system that can lead to unintentional mistakes or can be exploited by identity thieves. These weaknesses can be remedied in large part through a system less reliant upon paper. Online identity information can be as trusted and relied upon as paper-based identity information, and perhaps more so.
- The separation of identity information from program information (e.g. eligibility information/status) makes it structurally difficult, if not impossible, to build unauthorized profiles between programs. The service holding the identity information (Identity Information Service) will store the minimum amount of identity information needed to serve its purpose.
- The Identity Protection Service will act as privacy protective identity broker, for the secure sharing of identity information between programs where authorized. In essence, this service will act as safe deposit box that programs will use to store encrypted versions of program identifiers.
- Identity repair services will be offered in the IDIM solution. Citizens will have a single point of contact to review and correct their identity information. The contact point would be empowered to assist the person through the complex process of identity repair. Currently, there is no similar service, and the citizen is left to struggle with these issues with little assistance.
- The IDIM solution is a step towards ensuring that relying parties only obtain the information about an individual needed for a relevant transaction. As an example of the current world, an individual wishing to purchase a bottle of wine may be asked by liquor store clerk to provide identification to prove he is at least 19 years of age. The individual may show his BC Drivers License to the clerk. The clerk can now see considerable more information about the individual than is needed to complete the transaction e.g. his full name, his address, his date of birth. Under the IDIM solution, only the fact that the individual is at least 19 years of age would be conveyed. The solution will make citizens more aware of what information relying parties are seeking. It would allow citizens to abandon transactions where too much information is being requested. And it would force relying parties to consider what information they really need to complete a transaction.
- A range of cryptographic functions will be used to support the IDIM solution. These functions include encrypted data streams to prevent eavesdropping, digital signatures to provide message integrity, one-way cryptographic hashing to prevent data tampering or decryption, and public key infrastructure to enable verification of entities in the technical trust environment.
- A smart card (the BC Service Card) will be used as a strong authentication technique, to ensure that the person in possession of the card is the same person that enrolled for the claims and was issued the card. The card would not be used to store data about the individual. The smart card would also enable the use of cryptographic keys required to support the range of cryptographic functions.



I. BASIC INFORMATION cont'd

6. **Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

The Ministry of Health drafted a Conceptual PIA on the BC Services Card (Transforming the BC CareCard). It is not within the scope of this PIA to cover the whole of the BC Service Card project.

**IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO [X. SIGNATURES](#).**

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have altered the definition of personal information from "recorded information about an identifiable individual" to "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted. The amendments also generally alter the definition of public body employee to include a volunteer, and extend a public body's responsibilities under Part 3 of the Act to its employees, officers and directors and to its service providers and their employees, associates or affiliates.

DRAFT

## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the amended definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

Personal information will be collected, used and disclosed for IDIM to function.

However, since this is a conceptual PIA, it is out of scope to identify with certainty the exact information that will be collected, used and disclosed for IDIM.

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

Further clarity of the personal information flows involved for the IDIM solution, is expected as the initiative continues to develop. As this is a conceptual PIA, it is out of scope to identify with certainty the exact information flows. However, at a high level, it is expected that the information flows will be as follows:

- Individual government programs will all use one and the same agent (the Identity Assurance Services) for the purposes of identity registration, linking individuals in a privacy enhanced way, and updating basic personal information such as tombstone information and contact information (collectively referred to as the “Basic Information”), regarding individuals who access government programs.
- Individuals will provide their Basic Information to the Identity Assurance Services. There will be multiple registration processes, including in-person processes related to the Medical Services Plan enrolment and BC Drivers License issuance.
- The BC Services Card program (recall the separate PIA on the Card mentioned above) will provide to the individual an identification card (the “Card”), which will be used by the individual to enrol in programs, and then to access, on-line or off-line, the programs in which the individual is enrolled.
- The Card will contain a chip with a secured (encrypted) identifier. This chip will not contain any information about the individual holding the Card. The chip will facilitate enrolment in and subsequent interactions with programs.
- Each program will have its own eligibility requirements, and may collect information as needed for determining eligibility that is over and above and separate from the Basic Information.
- Upon enrolment, each program will assign a program-specific individual identifier (the “Program-Specific Individual Identifier”) to the individual (such as a PHN), for the program’s own program purposes.
- For every instance of enrolment in and then access to any program, the chip in the Card will retrieve from the Identity Assurance Services the Basic Information. During an enrolment in a program, the Program-Specific Individual Identifier is linked to the registered identity of the person who presented the Card. However, there is no accumulation of Program-Specific Individual Identifiers in the Identity Assurance Services. Instead, each program will map its Program-Specific Individual Identifier to some other value (the “Mapped Value”) that will be used only with the Identity Protection Service.

- Where a program (Program A) needs to link to another program (Program B) serving the same individual (for example, in the case of overlapping or joint responsibility), Program A will seek the services of the Identity Protection Service to do the linking. Neither program will have access to the other's Program-Specific Individual Identifier, nor will the Identity Protection Service. So the linking will have to be done through an anonymizing service housed by Identity Assurance Services. Using a common mathematical code, the anonymizing service will link the Mapped Values from each program, and as a result will be able to confirm that the individual is one and the same, but will not know the individual's identity. Once a match is made by the anonymizing service, each of the two programs will be enabled to retrieve the information that it is authorized to obtain.
- Each program will collect and generate information in the delivery of its program to each individual, for its own program purposes. Within the program, this program content information will presumably exist alongside the Basic Information and the Program-Specific Individual Identifier for each individual.
- When individuals update their Basic Information in the Identity Information Services, the services will have the ability to send revised Basic Information to every program with which the individual is enrolled.

## III

**PERSONAL INFORMATION COLLECTION**(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Yes | No | n/a |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| <p>Is personal information being collected?</p> <p>Only personal information needed for IDIM to function will be collected. Since this is a conceptual PIA, it is out of scope to identify with certainty the exact information that will be collected, used and disclosed for IDIM.</p> <p>All players in IDIM will need to ensure that they only collect information they are authorized to collect under the FOIPP Act as well as any other relevant legislation.</p> <p>The Bill 3, the <i>Freedom of Information and Protection of Privacy Amendment Act, 2011</i>, establishes the legislative foundation for provincial IDIM services. See <b>Appendix A</b> for full text of s. 26 (h), the specific IDIM-related provision now in the FOIPP Act which authorizes collection, and for full text of s. 69.2 regarding the power of the provincial identity information services provider to collect, use and disclose information to provide specific services.</p> | X   |    |     |

**IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)**

**1) Authorization for Collection:**

No personal information may be collected by or for a public body unless authorized under the FOIPP Act (as covered by numbers i, ii, or iii below).

|      |                                                                                                                          | Yes | No | n/a |
|------|--------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Has the collection of personal information been specifically authorized by, or under, an Act, other than the FOIPP Act?  | X   |    |     |
|      | <b>If yes, please specify the name of the Act and relevant section</b><br><br>see above                                  |     |    |     |
| ii.  | Has the personal information been collected for law enforcement purposes?                                                |     |    | X   |
| iii. | Is the personal information directly related to, and necessary for, an operating program or activity of the public body? | X   |    |     |

**If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your Director/Manager of Information and Privacy (DMIP) for ministries or the position responsible for FOI and Privacy Coordination (FOIPP Coordinator).**

**2) How will the personal information be collected?**

A public body must collect personal information or cause personal information to be collected directly from the individual the information is about, with certain specific exceptions.

|                                                                                                                                                                                                                                                                                                                       | Yes | No | n/a |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| Will the personal information be collected <u>directly</u> from the individual that the information is about?                                                                                                                                                                                                         |     |    |     |
| For information collected directly, a collection notice will be needed in accordance with s. 27(2) of the FOIPP Act.                                                                                                                                                                                                  |     |    |     |
| The Bill 3, the <i>Freedom of Information and Protection of Privacy Amendment Act, 2011</i> , establishes the legislative foundation for provincial IDIM services. See <b>Appendix A</b> for full text of s. 27(1)(g), the specific IDIM-related provision now in the FOIPP Act which authorizes indirect collection. | X   | X  |     |

**IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO [3. NOTIFICATION TO COLLECT INFORMATION](#).**

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

### III PERSONAL INFORMATION COLLECTION cont'd

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Yes | No | n/a |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Did the individual the information is about authorize another method of collection?                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |    | X   |
| ii.  | Has indirect collection been authorized by the Information and Privacy Commissioner?                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |    | X   |
| iii. | Has indirect collection been authorized by another enactment?                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | X   |    |     |
|      | <b>If yes, please specify the name of the Act and relevant section(s)</b><br><br>For information collected directly, a collection notice will be needed in accordance with s. 27(2) of the FOIPP Act.<br><br>The Bill 3, the <i>Freedom of Information and Protection of Privacy Amendment Act, 2011</i> , establish the legislative foundation for provincial IDIM services. See <b>Appendix A</b> for full text of s. 27(1)(g), the specific IDIM-related provision now in the FOIPP Act which authorizes indirect collection. |     |    |     |
| iv.  | Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?                                                                                                                                                                                                                                                                                                                                                                |     |    | X   |
| v.   | Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?                                                                                                                                                                                                                                                                                                                                                         |     |    | X   |
| vi.  | Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?                                                                                                                                                                                                                                                                                                                                                       |     |    | X   |
| vii. | Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?                                                                                                                                                                                                                                                                                                                                                                                             |     |    | X   |

|       |                                                                                                                                                                          | Yes | No | n/a |
|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| viii. | Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?                                                            |     |    | X   |
| ix.   | Is the personal information being collected for the purpose of law enforcement?                                                                                          |     |    | X   |
| x.*   | Is the public body collecting personal information disclosed to it under section 33, section 33.1, section 33.2, section 34, section 35, or section 36 of the FOIPP Act? |     |    | X   |
|       | <b>Specify relevant section(s) or subsections that apply.</b>                                                                                                            |     |    |     |
|       | <b>Additional details as required (e.g., explanation of method of collection)</b>                                                                                        |     |    |     |

***If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your DMIP or FOIPP Coordinator.***

### **3) Notification to collect information**

***A public body must ensure that an individual from whom it collects personal information or causes personal information to be collected is notified of the collection as outlined below.***

### III PERSONAL INFORMATION COLLECTION cont'd

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Yes | No | n/a |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i. | Has the individual whose personal information is being collected, been informed of:                                                                                                                                                                                                                                                                                                                                                               |     |    |     |
|    | (a) the purpose for collection?                                                                                                                                                                                                                                                                                                                                                                                                                   | X   |    |     |
|    | (b) the legal authority for collection?                                                                                                                                                                                                                                                                                                                                                                                                           | X   |    |     |
|    | (c) the contact information of the person who can answer questions regarding the collection?                                                                                                                                                                                                                                                                                                                                                      | X   |    |     |
|    | For information collected directly, a collection notice will be needed in accordance with s. 27(2) of the FOIPP Act.<br><br>The Bill 3, the <i>Freedom of Information and Protection of Privacy Amendment Act, 2011</i> , establishes the legislative foundation for provincial IDIM services. See <b>Appendix A</b> for full text of s. 27(1)(g), the specific IDIM-related provision now in the FOIPP Act which authorizes indirect collection. |     |    |     |

**Notification is not required if the answer is “yes” to any of the following:**

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Yes | No | n/a |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| ii.  | Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?                                                                                                                                                                                                                                                                                                                                                                                                 |     |    | X   |
| iii. | Has the Minister responsible for the FOIPP Act excused your public body from complying because it would                                                                                                                                                                                                                                                                                                                                                                                                                       |     |    |     |
|      | (a) result in the collection of inaccurate information?                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     |    | X   |
|      | <b>or</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |    |     |
|      | (b) defeat the purpose or prejudice the use for which the personal information is collected?                                                                                                                                                                                                                                                                                                                                                                                                                                  |     |    | X   |
| iv.  | The information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |    |     |
|      | (a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, <b>and</b>                                                                                                                                                                                                                                                                                                                                                                                                | X   |    |     |
|      | (b) is not collected directly from the individual the information is about                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |    |     |
|      | <b>Additional details as required (e.g., method of notification)</b><br><br>For information collected directly, a collection notice will be needed in accordance with s. 27(2) of the FOIPP Act.<br><br>The Bill 3, the <i>Freedom of Information and Protection of Privacy Amendment Act, 2011</i> , establishes the legislative foundation for provincial IDIM services. See <b>Appendix A</b> for full text of s. 27(1)(g), the specific IDIM-related provision now in the FOIPP Act which authorizes indirect collection. |     |    |     |

**If you have not provided the required notification as outlined above, please contact your DMIP or FOIPP Coordinator.**



#### IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Yes | No | n/a |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| <p>Is personal information being used?</p> <p>Only personal information needed for IDIM to function will be used. Since this is a conceptual PIA, it is out of scope to identify with certainty the exact information that will be collected, used and disclosed for IDIM.</p> <p>All players in IDIM will need to ensure that they only use personal information they are authorized to use under the FOIPP Act as well as any other relevant legislation.</p> <p>See <b>Appendix A</b> for full text of s. 69.2 regarding the power of the provincial identity information services provider to collect, use and disclose information to provide specific services.</p> | X   |    |     |

#### IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO [V. DISCLOSURE OF PERSONAL INFORMATION](#)

*Under the FOIPP Act, a public body must ensure that personal information in its custody or under its control is only used for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

|      |                                                                                                                                                                                                                                                          | Yes | No | n/a |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1.   | <p>Has the individual the personal information is about consented to the use?<br/>(Note: Supporting documentation must be on file.)</p> <p>This authority may apply in some circumstances, and will need to be considered moving forward.</p>            | X   |    |     |
| 2.   | <p>Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?</p> <p>This authority may apply in some circumstances, and will need to be considered moving forward.</p> | X   |    |     |
|      | <p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p>                                                               |     |    |     |
| 3. * | <p>If the personal information was disclosed to the public body under section 33, section 33.1, section 33.2, section 34, section 35 or section 36, is the information being used for that same purpose?</p>                                             | X   |    |     |
|      | <p><b>Specify subsection(s) being applied</b></p> <p>This authority may apply in some circumstances, and will need to be considered moving forward.</p>                                                                                                  |     |    |     |



IV USE OF PERSONAL INFORMATION cont'd

***If you have not checked one of the above, you do not have the authority to use the information. Please contact your DMIP or FOIPP Coordinator.***

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## V

**DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 34, section 35 and section 36 of the FOIPP Act)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Yes | No | n/a |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| <p>Is personal information being disclosed?</p> <p>Only personal information needed for IDIM to function will be used. Since this is a conceptual PIA, it is out of scope to identify with certainty the exact information that will be collected, used and disclosed for IDIM.</p> <p>All players in IDIM will need to ensure that they only disclose personal information they are authorized to disclose under the FOIPP Act as well as any other relevant legislation.</p> <p>The Bill 3, the <i>Freedom of Information and Protection of Privacy Amendment Act, 2011</i>, establishes the legislative foundation for provincial IDIM services. See <b>Appendix A</b> for full text of s. 33.1(5), the specific IDIM-related provision now in the FOIPP Act which authorizes disclosure, and for full text of s. 69.2 regarding the power of the provincial identity information services provider to collect, use and disclose information to provide specific services.</p> | X   |    |     |

**IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO  
[VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION.](#)**

***A public body must ensure that personal information in its custody or under its control is disclosed only as permitted under sections 33, 33.1, 33.2, 34, 35, and 36 of the FOIPP Act.***

1) **Disclosure of Personal Information**

Sections 33, 33.1 and 33.2 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please check the main authorization(s) for disclosure below.

**(Note that the numbering is taken from sections 33.1 and 33.2 of the FOIPP Act.)**

| <b>s. 33.1</b>  | <b>Disclosure inside OR outside Canada</b>                                                                                                                                  | Yes | No | n/a |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| <b>(1)(a)</b>   | In accordance with Part 2                                                                                                                                                   |     |    | X   |
| <b>(1)(a.1)</b> | If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):                                                                         |     |    |     |
|                 | 22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if                                                           |     |    |     |
|                 | (e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff, |     |    | X   |
|                 | (f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,                                                          |     |    | X   |
|                 | (h) the information is about expenses incurred by the third party while travelling at the expense of a public body,                                                         |     |    | X   |

| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                                                                                                                                                                                       | Yes | No | n/a |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|          | (i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or                                                                                                                                                 |     |    | X   |
|          | (j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).                                                                                                              |     |    | X   |
| (1)(b)   | If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable<br>(Note: Supporting documentation must be on file)<br><br>This may apply in some circumstances. Further review will be needed moving forward.                                                               |     |    | X   |
| (1)(c)   | In accordance with an enactment of British Columbia or Canada that authorizes or requires its disclosure                                                                                                                                                                                                                                                                                  | X   |    |     |
|          | <b>Specify name of enactment and relevant section(s)</b><br><br>See <b>Appendix A</b> for full text of s. 33.1(5), the specific IDIM-related provision now in the FOIPP Act which authorizes disclosure, and for full text of s. 69.2 regarding the power of the provincial identity information services provider to collect, use and disclose information to provide specific services. |     |    |     |
| (1)(c.1) | If the personal information is made available to the public in British Columbia under an enactment, other than the <i>Freedom of Information and Protection of Privacy Act</i> , that authorizes or requires the information to be made public                                                                                                                                            |     |    | X   |
|          | <b>Specify name of enactment and relevant section(s)</b>                                                                                                                                                                                                                                                                                                                                  |     |    |     |
| (1)(d)   | In accordance with a provision of a treaty, arrangement or written agreement that<br><br>(i) authorizes or requires its disclosure, and<br><br>(ii) is made under an enactment of British Columbia or Canada                                                                                                                                                                              |     |    | X   |
| (1)(e)   | To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if<br><br>(i) the information is necessary for the performance of the duties of the minister, officer or employee,                                                                                                                                     |     |    | X   |
|          | <b>and</b><br><br>(ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada                                                                                                                                                                                                                      |     |    | X   |
|          | <b>If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>                                                                                                                                                                                                                                           |     |    |     |

| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                                                                                                | Yes | No | n/a |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (1)(e.1) | To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if<br>(i) the information is necessary for the performance of the duties of the individual in relation to the public body,                                                  |     |    | X   |
|          | <b>and</b><br>(ii) in relation to disclosure outside Canada,<br>(A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and<br>(B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada |     |    | X   |
|          | <b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>                                                                                                                                                  |     |    |     |

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

|        |                                                                                                                                                                                             |  |  |   |
|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|---|
| (1)(f) | To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister |  |  | X |
| (1)(g) | To the Attorney General or legal counsel for the public body, for use in civil proceedings involving the government or public body                                                          |  |  | X |
| (1)(h) | To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act                                                    |  |  | X |
| (1)(i) | If                                                                                                                                                                                          |  |  |   |
|        | (i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by                                                                |  |  |   |
|        | a. an individual, or                                                                                                                                                                        |  |  | X |
|        | b. corporation of which the individual the information is about is or was a director or officer,                                                                                            |  |  | X |
|        | <b>and</b>                                                                                                                                                                                  |  |  |   |
|        | (ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that                                                                                              |  |  |   |
|        | a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or                                                                                    |  |  | X |
|        | b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction                                                                         |  |  | X |
| 1(i.1) | For the purposes of                                                                                                                                                                         |  |  |   |
|        | (i) a payment to be made to or by the government of British Columbia or a public body,                                                                                                      |  |  | X |
|        | (ii) authorizing, administering, processing, verifying or canceling such a payment, or                                                                                                      |  |  | X |
|        | (iii) resolving an issue regarding such a payment                                                                                                                                           |  |  | X |
| (1)(j) | In the case of the Insurance Corporation of British Columbia, if                                                                                                                            |  |  |   |
|        | (i) the information was obtained or compiled by that public body for purposes of insurance provided by the public body, and                                                                 |  |  | X |
|        | (ii) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim                                                                                 |  |  |   |
| (1)(k) | For the purposes of                                                                                                                                                                         |  |  |   |
|        | (i) licensing or registration of motor vehicles or drivers, or                                                                                                                              |  |  | X |
|        | (ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences                                                                                                |  |  | X |

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

|        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |  |   |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|---|
| (1)(l) | For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |  | X |
| (1)(m) | If <ul style="list-style-type: none"> <li>(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and</li> <li>(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety</li> </ul>                                                                                                                                                                                                                                              |  |  | X |
| (1)(n) | So that the next of kin or a friend of an injured, ill or deceased individual may be contacted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |  | X |
| (1)(o) | In accordance with section 36 (disclosure for archival or historical purposes)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |  | X |
| (1)(p) | The disclosure <ul style="list-style-type: none"> <li>(i) is necessary for <ul style="list-style-type: none"> <li>(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or</li> <li>(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body</li> </ul> </li> </ul> |  |  | X |
|        | and <ul style="list-style-type: none"> <li>(ii) in the case of disclosure outside Canada <ul style="list-style-type: none"> <li>(A) is limited to temporary access and storage for the minimum time necessary for that purpose, and</li> <li>(B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred</li> </ul> </li> </ul>                                                                                                                                                                                                                                               |  |  | X |
|        | <b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |  |   |

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

|        |                                                                                                                                                                                                                                                       |  |  |   |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|---|
| (2)    | In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33                                                    |  |  |   |
| (2)(a) | to another law enforcement agency in Canada                                                                                                                                                                                                           |  |  | X |
| (2)(b) | to a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.                                                                                                 |  |  | X |
| (3)    | The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable. |  |  | X |
|        | <b>Additional details as required</b>                                                                                                                                                                                                                 |  |  |   |

*If you have not checked any of the above authorizations for disclosure or require clarification, you should contact your DMIP or FOIPP Coordinator.*



## V DISCLOSURE OF PERSONAL INFORMATION cont'd

| s. 33.2 | Disclosure inside Canada only                                                                                                                                                                                                                                                  | Yes | No | n/a |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a)     | For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)                                                                                                                                                               | X   |    |     |
|         | <b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b><br><br>This may apply in some circumstances. Further review will be needed moving forward. |     |    |     |
| (b)     | To comply with a subpoena, warrant or order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information                                                                                                                      |     |    | X   |
| (c)     | To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister                                                                                                          |     |    | X   |
| (d)     | To an officer or employee of a public body or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties of the officer, employee or minister to whom the information is disclosed    |     |    | X   |
| (e)     | To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister                                                                                                   |     |    | X   |
| (f)     | To the auditor general or any other prescribed person or body for audit purposes                                                                                                                                                                                               |     |    | X   |
| (g)     | To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem                                                                                                                                     |     |    | X   |
| (h)     | To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry                                                                                                                              |     |    | X   |
| (i)     | To a public body or a law enforcement agency in Canada to assist in a specific investigation                                                                                                                                                                                   |     |    |     |
|         | (i) undertaken with a view to a law enforcement proceeding, or                                                                                                                                                                                                                 |     |    | X   |
|         | (ii) from which a law enforcement proceeding is likely to result                                                                                                                                                                                                               |     |    | X   |
| (j)     | To the archives of the government of British Columbia or the archives of a public body, for archival purposes                                                                                                                                                                  |     |    | X   |
| (k)     | In accordance with section 35 (disclosure for research or statistical purposes)                                                                                                                                                                                                |     |    | X   |
|         | <b>Additional details as required</b>                                                                                                                                                                                                                                          |     |    |     |



## V DISCLOSURE OF PERSONAL INFORMATION cont'd

### 2) Systematic or Repetitious Disclosure/Exchanges?

|      |                                                                                                                               | Yes | No | n/a |
|------|-------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Do the disclosures of personal information under section 33.2 occur on a regular basis?                                       |     |    | X   |
| ii.  | Has an Information Sharing Agreement been completed for these disclosures/exchanges?                                          |     |    | X   |
| iii. | Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ? |     |    | X   |

**Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.**

### 3) Research or Statistical Purposes (Section 35)

|                                                                                                          | Yes | No | n/a |
|----------------------------------------------------------------------------------------------------------|-----|----|-----|
| Has a researcher requested access to personal information in an identifiable form for research purposes? |     |    | X   |

**If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact your DMIP or FOIPP Coordinator for assistance.**

***Please note:*** Research using personal information may only be conducted if it meets all of the terms of section 35.

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

### 4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information or cause personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

|     |                                                                                                      | Yes | No | n/a |
|-----|------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a) | The disclosure would not be an unreasonable invasion of personal privacy under section 22            |     |    | X   |
| (b) | The disclosure is for historical research and is in accordance with section 35 (research agreements) |     |    | X   |
| (c) | The information is about someone who has been dead for 20 or more years                              |     |    | X   |
| (d) | The information is in a record that has been in existence for 100 or more years                      |     |    | X   |

***If you have not answered "yes" to any of the above authorizations for disclosure or if you require clarification, please contact your DMIP or FOIPP Coordinator.***

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
(Section 28 and section 29 of the FOIPP Act)

If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

|                                                                                                                                                                                                                                                                                 |                                                                                                                                                            | Yes | No | n/a |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1.                                                                                                                                                                                                                                                                              | Are there procedures in place to enable an individual to request/review a copy of their own personal information?                                          |     |    | X   |
| 2.                                                                                                                                                                                                                                                                              | Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file? |     |    | X   |
| 3.                                                                                                                                                                                                                                                                              | If personal information is corrected, are there procedures in place to notify other holders of this information?                                           |     |    | X   |
| <b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>                                                                                                                                                                      |                                                                                                                                                            |     |    |     |
|                                                                                                                                                                                                                                                                                 | Policy/procedure:                                                                                                                                          |     |    |     |
|                                                                                                                                                                                                                                                                                 | Contact person:                                                                                                                                            |     |    |     |
|                                                                                                                                                                                                                                                                                 | Phone number:                                                                                                                                              |     |    |     |
| <b>Additional details as required</b>                                                                                                                                                                                                                                           |                                                                                                                                                            |     |    |     |
| <p>Since this is a conceptual PIA, examining accuracy and correction is out of scope. However, as the development of the IDIM solution proceeds, all players will need to ensure that they comply with applicable legislation and policy regarding accuracy and correction.</p> |                                                                                                                                                            |     |    |     |

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator for further clarification.***

## VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the FOIPP Act)

**Note:** For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the [Signatures](#) section.

For PIAs that do not involve systems initiatives, this section should be completed by the Branch or DMIP/FOI Coordinator completing the PIA. In this case, the signature of the systems representative is not required.

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

|                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                              | Yes | No | n/a |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1.                                                                                                                                                                                                                                                                                                                                                                                                                              | Is there reasonable technical security in place to protect against unauthorized access or disclosure?                                                        |     |    | X   |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                              | Is there reasonable physical security in place to protect against unauthorized access or disclosure?                                                         |     |    | X   |
| 3.                                                                                                                                                                                                                                                                                                                                                                                                                              | Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information? |     |    | X   |
| <b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                              |     |    |     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                 | Policy/procedure:                                                                                                                                            |     |    |     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                 | Contact person:                                                                                                                                              |     |    |     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                 | Phone number:                                                                                                                                                |     |    |     |
| <b>Additional details as required</b>                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                              |     |    |     |
| 4.                                                                                                                                                                                                                                                                                                                                                                                                                              | Have user access profiles been assigned on a need-to-know basis?                                                                                             |     |    | X   |
| 5.                                                                                                                                                                                                                                                                                                                                                                                                                              | Do controls and procedures exist for the authority to add, change or delete personal information?                                                            |     |    | X   |
| 6.                                                                                                                                                                                                                                                                                                                                                                                                                              | Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?     |     |    | X   |
| <b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>                                                                                                                                                                                                                                                                                                          |                                                                                                                                                              |     |    |     |
| 7.                                                                                                                                                                                                                                                                                                                                                                                                                              | Does the audit identify inappropriate accesses to the system?                                                                                                |     |    | X   |
| <b>Additional details</b><br>Since this is a conceptual PIA, examining security of personal information is out of scope. However, as the development of the IDIM solution proceeds, all players will need to ensure that they comply with applicable legislation and policy. Reasonable security arrangements will need to be in place to ensure that personal information is protected, as required by s. 30 of the FOIPP Act. |                                                                                                                                                              |     |    |     |

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator.***

## **VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION cont'd**

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

|  |                                                            | Yes | No | n/a |
|--|------------------------------------------------------------|-----|----|-----|
|  | Will the information be stored or accessed only in Canada? |     |    | X   |

**Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

|    |                                                                                                                                                                                                                                                                                                                                                                                      | Yes | No | n/a |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?                                                                                                                                                                                                             |     |    | X   |
|    | <b>Please explain</b>                                                                                                                                                                                                                                                                                                                                                                |     |    |     |
| 2. | Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?                                                                                                                                                                          |     |    | X   |
|    | <b>Please explain</b>                                                                                                                                                                                                                                                                                                                                                                |     |    |     |
| 3. | Will the personal information be disclosed under section 33.1(1)(i.1)?                                                                                                                                                                                                                                                                                                               |     |    | X   |
|    | <p>Since this is a conceptual PIA, examining security is out of scope. However, as the development of the IDIM solution proceeds, all players will need to ensure that they comply with applicable legislation and policy. Reasonable security arrangements will need to be in place to ensure that personal information is protected in accordance with s. 30 of the FOIPP Act.</p> |     |    |     |

***If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact your DMIP or FOIPP Coordinator.***

## VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

**If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.**

|    |                                                                                                                                                                      | Yes | No | n/a |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Do you have an approved records retention and disposition schedule?                                                                                                  |     |    | X   |
| 2. | Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use? |     |    | X   |

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your DMIP or Records Officer.***

**Note:** Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.

**IX DIRECTOR/MANAGER OF INFORMATION AND PRIVACY (DMIP) OR FOIPP COORDINATOR REVIEW**

|                                                                                                                                                                                                             |                                                                                                                                                                                | Yes | No | n/a |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1.                                                                                                                                                                                                          | Have you contacted the individual responsible for the completion of the PIA to discuss the information submitted, in particular those questions identified by an asterisk (*)? |     |    |     |
| 2.                                                                                                                                                                                                          | Does the initiative meet the requirements of the FOIPP Act?                                                                                                                    |     |    |     |
| 3.                                                                                                                                                                                                          | Is there a mechanism in place to review this PIA, as appropriate, to ensure the information remains current?                                                                   |     |    |     |
| 4.                                                                                                                                                                                                          | Are you satisfied that the policies/procedures for correction and/or annotation are adequate?                                                                                  |     |    |     |
| <b>If there is additional information that would support the intended collection, use or disclosure of the personal information, please either insert in the appropriate text box or append to the PIA.</b> |                                                                                                                                                                                |     |    |     |

**Comments**

**X      SIGNATURES**

**PUBLIC BODY APPROVAL:**

\_\_\_\_\_  
Program Manager (if appropriate)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Knowledge and Information Services  
Office of the Chief Information Officer  
Ministry of Labour, Citizens' Service and Open  
Government

\_\_\_\_\_  
Date

\_\_\_\_\_  
Ministry Contact Responsible for  
Systems Maintenance and Security  
*[this signature only required for PIAs on new or existing  
systems]*

\_\_\_\_\_  
Date

\_\_\_\_\_  
Assistant Deputy Minister or Equivalent

\_\_\_\_\_  
Date

**GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA and/or ISA summary)**



**Purpose for which personal information may be collected**

**26** A public body may collect personal information only if

- ... (h) the information is personal identity information that is collected by
  - (i) a provincial identity information services provider and the collection of the information is necessary to enable the provincial identity information services provider to provide services under section 69.2, or
  - (ii) a public body from a provincial identity information services provider and the collection of the information is necessary to enable
    - (A) the public body to identify an individual for the purpose of providing a service to the individual, or
    - (B) the provincial identity information services provider to provide services under section 69.2.

**How personal information is to be collected**

**27** (1) A public body must collect personal information or cause personal information to be collected directly from the individual the information is about unless

- (g) the information is personal identity information that is collected by a provincial identity information services provider and the collection of the information is necessary to enable the provincial identity information services provider to provide services under section 69.2.

**Disclosure inside or outside Canada**

**33.1** (5) In addition to the authority under any other provision of this section or section 33.2, a provincial identity information services provider may disclose personal identity information

- (a) to enable the provincial identity services provider to provide services under section 69.2, or
- (b) to a public body if the disclosure is necessary to enable the public body to identify an individual for the purpose of providing a service to the individual.

(6) In addition to the authority under any other provision of this section or section 33.2, a public body may disclose personal identity information to a provincial identity information services provider if the disclosure is necessary to enable

(a) the public body to identify an individual for the purpose of providing a service to the individual, or

(b) the provincial identity information services provider to provide services under section 69.2.

### **Provincial identity information services provider**

**69.2** (1) The minister responsible for this Act may designate a public body as a provincial identity information services provider.

(2) A provincial identity information services provider, by exercising its powers respecting the collection, use and disclosure of information, may provide the following services:

(a) identifying an individual;

(b) verifying the identity of an individual;

(c) updating personal identity information about an individual;

(d) issuing a physical or an electronic credential to an individual;

(e) managing the information associated with a physical or an electronic credential;

(f) any other service related to personal identity information that the minister responsible for this Act considers appropriate.

(3) The minister responsible for this Act may give directions to a provincial identity information services provider or a public body respecting

(a) the type and quantity of personal identity information required to identify, or verify the identity of, individuals seeking access to government services,

(b) the provision to individuals of physical and electronic credentials for use in accessing government services,

(c) the privacy and security of personal identity information that is collected, used or disclosed under this Act,

(d) the format in which personal identity information is collected, used or disclosed under this Act, and

(e) the circumstances in which particular types of personal identity information may or may not be collected, used or disclosed in relation to services provided under subsection (2).

(4) The minister, under subsection (3), may give different directions for different categories of personal identity information, personal identity information services and government services.

**Schedule 1** is amended to include the following definitions:

**"personal identity information"** means any personal information of a type that is commonly used, alone or in combination with other information, to identify or purport to identify an individual;

**"provincial identity information services provider"** means a provincial identity information services provider designated under section 69.2 (1);

## APPENDIX B – INFORMATION REGISTRIES

The following lists the key Information Registries used by the Identity Assurance Services to store the identity and credential information:

1. Identity Information Registry, which contains:
  - an identifier for use within IDIM
  - personal identity attributes: legal names (primary and other), date of birth, death
  - personal digital photograph, depending on which registration process was used
  - personal contact information: residential and mailing addresses, phone number, email address, with preferences about contact method
  - supporting records of registration and updates: registration events, name and address change events
  - supporting evidence from identity proofing events: reference numbers and issuers of identity documents presented, depending on which registration process was used
  - identification level achieved for reference and for computing identity assurance level during authentication events
2. Identity Protection Registry, which contains:
  - an identifier for use within IDIM services
  - directed identifiers provided by government programs
  - references to government programs
  - groupings of government programs (privacy zones) that can share identifiers
  - linkages between identifiers
  - supporting records of registration and updates
3. Chip Credential Service, which contains:
  - an identifier for use within IDIM services
  - chip identifier and cryptogram to validate with
  - status of chip
  - expiry date of chip
  - credential issuer, card type
  - supporting records of registration and updates: issuance and update events, status change events for expiry and revocation

4. Passcode Credential Service, which contains:

- an identifier for use within IDIM services
- chip identifier and passcode to validate with
- status of passcode
- expiry date of passcode
- supporting records of registration and updates: issuance and update events, status change events for expiry and revocation

5. BCeID Credential Service, which contains:

- an identifier for use within IDIM services
- userID and password to validate with
- status of password
- expiry date of password
- supporting records of registration and updates: issuance and update events, status change events for expiry and revocation

## APPENDIX C - IDENTITY ASSURANCE SERVICES – CONTEXT DIAGRAM AND KEY INTERACTIONS

The context diagram immediately below shows the interaction of the Identity Assurance with three external types of parties:

- Individuals that interact with the government, who are users and the subjects of government programs and services.
- Authoritative Parties, or registering organizations, notably the provincial driver licensing program and health insurance program, that provide authoritative information to the Identity Assurance Services about the identity of individuals and credentials issued to them by these programs.
- Relying Parties, such as online and counter services that deliver many government programs, that rely on the Identity Assurance Services to identify, authenticate and provide identity information about their clients.

The IDIM program itself also acts in the role of an Authoritative Party for those individuals that register through its services, and acts in the role of a Relying Party for services it delivers to individuals, such as viewing their own identity information.

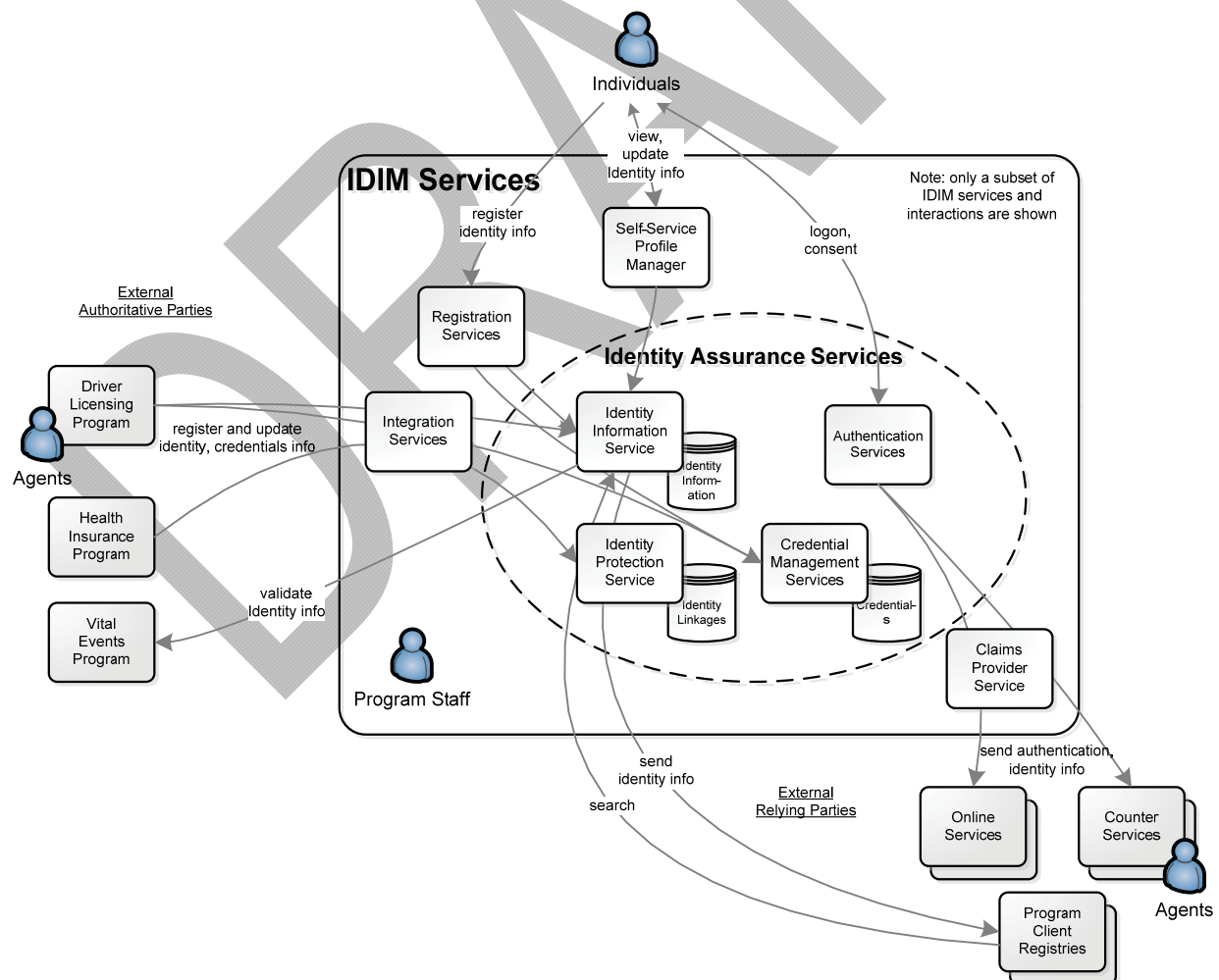
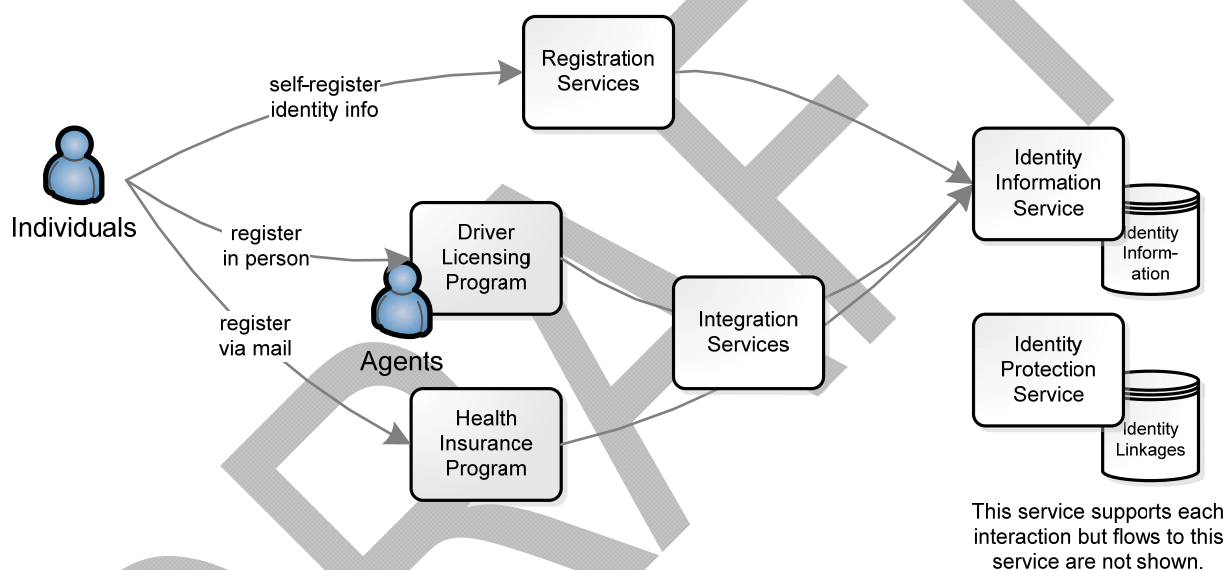


Figure 1 - Context of Identity Assurance Services

The Identity Assurance Services are significantly involved in the sharing of identity information with government programs and services. As shown in the context diagram, the services interact with individuals, various registering organizations and services, and relying parties. The following sections describe the key identity information sharing interactions (business processes).

## Registering and Updating Identity Information

The Identity Assurance Services has partnerships with several organizations and services to register and update the identity information about individuals. Identity information is collected, may be validated through identity proofing to different levels of identity assurance, and registered as part of a process of obtaining a credential issued by the Province.



**Figure 2 - Registering and updating identity information**

The registering organizations and services will be:

1. The driver licensing program, which is where the majority of BC residents will be identified and identity proofed to identity assurance level 3 through an in-person registration event.
2. The health insurance program, which is where children and special cases of BC residents will be identified and minimally identity proofed to identity assurance level 1 or 2 through a mail-in registration form or information gathered from Authoritative Parties.
3. The IDIM program itself, using the (BCeID) online self-service registration application, which is where BC residents or non-residents can register using one of these options depending on what level of identity assurance they need to access government online services.
  - a. Individual submits minimal identity information online which is not subject to any verification processes, and the individual is not identity proofed; this results in identity assurance level 1.

- b. Individual submits identity information online which is subject to a verification process involving knowledge-based authentication with a credit bureau; this results in identity assurance level 2.
- c. Individual submits identity information online with supporting evidence of identity (e.g. driver licence number, birth certificate number), then the individual is required to visit a government agent counter to be identity proofed; this results in identity assurance 3, however when paired with a userID/password credential actually results in identity assurance level 2.

Another initiative is underway to establish a registration process and biometric credential to support the special needs of the Province's correction program for in-custody (in jail) and in-community (on parole) clients. Thus another registering organization will be:

4. The corrections program, which is where their clients will be identified through documentation where possible, and matched to previously known clients using physical characteristics and biometric credentials. *(This is mentioned briefly here but not the focus of this document.)*

## Registering and Updating Credential Information

As mentioned above, identity information is collected and registered for the purpose of obtaining a credential issued by the Province. Credential information is established during the issuance process, and also needs to be registered in the Identity Assurance Services to support authentication processes. Credential information may be registered at the same time as identity information is registered.

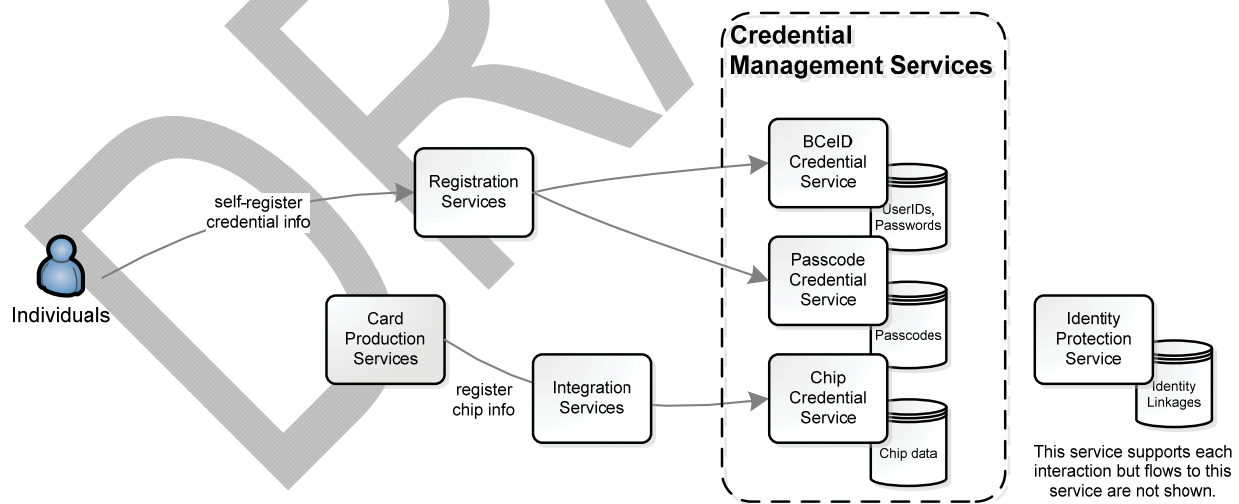


Figure 3 - Registering and updating credential information

The credential issuing organizations and services will be:

5. The BC Services Card program, where contactless smartcards will be produced and delivered by the same organization that issues the driver licence card and BC identification card.



6. The IDIM program itself, using the (BCeID) online self-service registration application, where individuals will create credentials for themselves. There are two types:
  - a. Passcode – for use as a second factor credential with a smartcard
  - b. BCeID userID/password

Note that only the credential issuance interactions are described above. There are many other credential lifecycle events that occur that are not described in this document, such as an individual or a help desk resetting a password, an authorized agent revoking a credential that is reported lost or stolen, or automated expiry after a period of time.

### Searching, Viewing and Updating Identity Information

The Identity Assurance Services supports the retrieval of identity information for individuals to view and change information about themselves, for authorized government programs to search for individuals and retrieve information, and for IDIM program staff (and possibly partners' program staff) to search, view and change information about individuals to support identity repair (corrections) and identity fraud investigations.

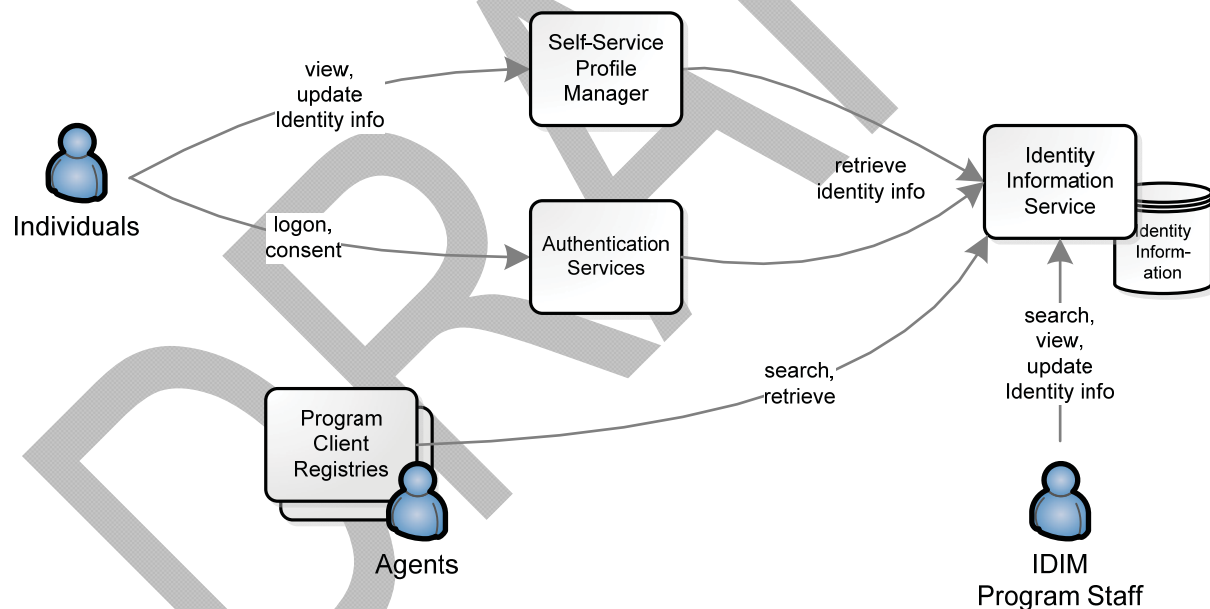


Figure 4 - Searching, viewing and updating identity information

The view and update interfaces will be:

1. The IDIM program's (BCeID) online self-service profile manager application, where an individual can view the personal identity information registered about them. Most identity information cannot be updated by the individual; for example, an individual cannot change their name here, but rather through the Vital Statistics Agency's name change program. However, an individual will be allowed to change their contact information, such as their address, and some preferences about how their identity information is shared with government programs.

2. The IDIM program's authentication interfaces, where an individual can view the identity information and, where required, consent to its disclosure before it is sent to a relying party.
3. Authorized relying parties, using their applications where an agent of the relying party program or service can either:
  - a. search for individuals by name and birthdate, and receive back either that a match was found, with or without additional identity information. This can be used to authenticate individuals that are registered in the Identity Assurance Services but do not have their credentials at a Point of Service – an agent can search for and verify using the retrieved digital photograph of the individual.
  - b. retrieve identity information about individuals that are already known to the program or service and have previously linked records using the Identity Protection Service.
4. The IDIM program's internal tools to search, view and change identity information about individuals that are registered. These tools may be extended to authorized partners' program staff, such as the driver licensing and health insurance program. This would be used by staff to support identity repair (legitimate corrections to registered information), identity fraud investigations, and possibly call centres and help desks, and registration agents.

### Sending Identity Information during Authentication

The Identity Assurance Services supports the retrieval of identity information (by the Claims Provider Service) to send to relying parties during the authentication process.

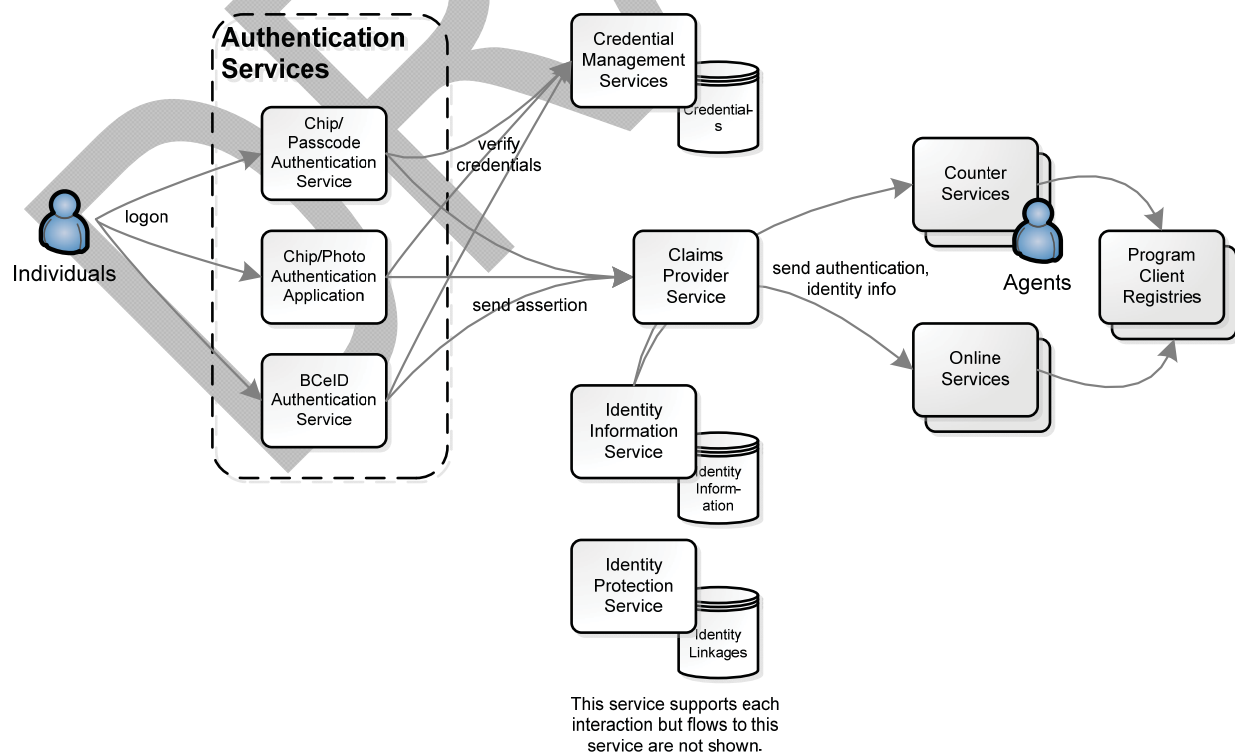


Figure 5 - Sending identity information during authentication

The interfaces that send identity information in the authentication context will be:

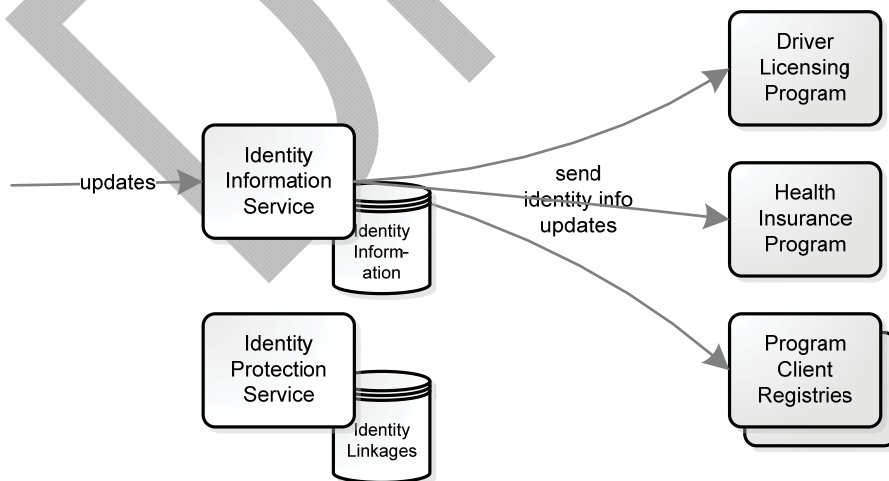
1. The IDIM program's authentication services, which provides the identifier of the individual who authenticated and minimal identity information to a relying party.
2. The IDIM program's Claims Provider Service which retrieves identity information from the Identity Information Service and other IDIM services (such as the business and professional affiliation service or a business roles registry).

The relying party applications that receive and use the identity information will be:

- A. An online service, where it then uses the identity information to link with a known individual in the program or service's client registry (or user record table), or to register an unknown individual as a new client or user.
- B. A counter service, either using a payment terminal device that reads smartcards or a Point of Service application integrated with a smartcard reader. The identity information is used to authenticate the individual with a photo, and/or link with a known individual in the program or service's client registry.

### Publishing Identity Information Updates

The Identity Assurance Services supports the updating of identity information at authoritative parties and relying parties by publishing events when identity information changes within IDIM services. Identity information can change over time, through updates by the registering organizations and/or the individuals themselves. It is expected that registering organizations and authoritative parties also publish events when identity information changes within their programs. Some examples of identity information changes that are published are contact address changes and notice of death of an individual.



This service supports each interaction but flows to this service are not shown.

Figure 6 - Publishing identity information updates

Credential information associated with identity information can also change over time, such as when a credential expires or is revoked, and would use a similar approach to communicating with credential issuers.

### **Sending Evidence of Identity Information for Validation**

The Identity Assurance Services supports the identity proofing process by providing interfaces to issuers (authoritative parties) of trusted identity documents. The only interface in scope at this time is an interface to the BC Vital Statistics Agency that will be used to validate a BC birth certificate document. This interaction will be used to increase the identity assurance level of registered individuals from level 3 to 4 where possible. Someday there will hopefully be validation interfaces to other identity document issuers, such as other provinces' vital event programs and federal passport and immigration programs.

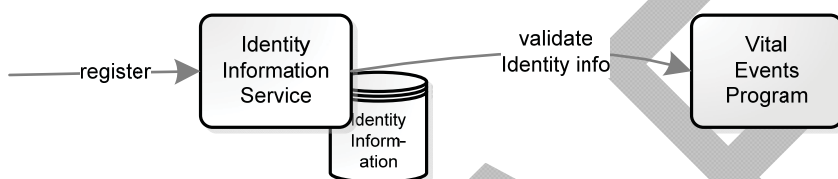


Figure 7 - Sending evidence of identity information for validation

### **Registering Identifiers for a Government Program**

The Identity Assurance Services allows a government program to register an identifier for an individual to support future information sharing with another government program about an individual in common.

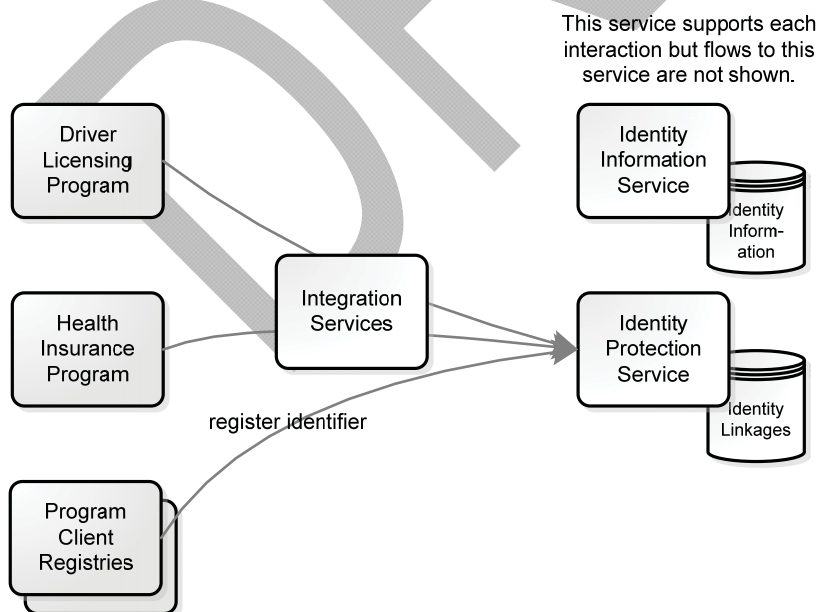
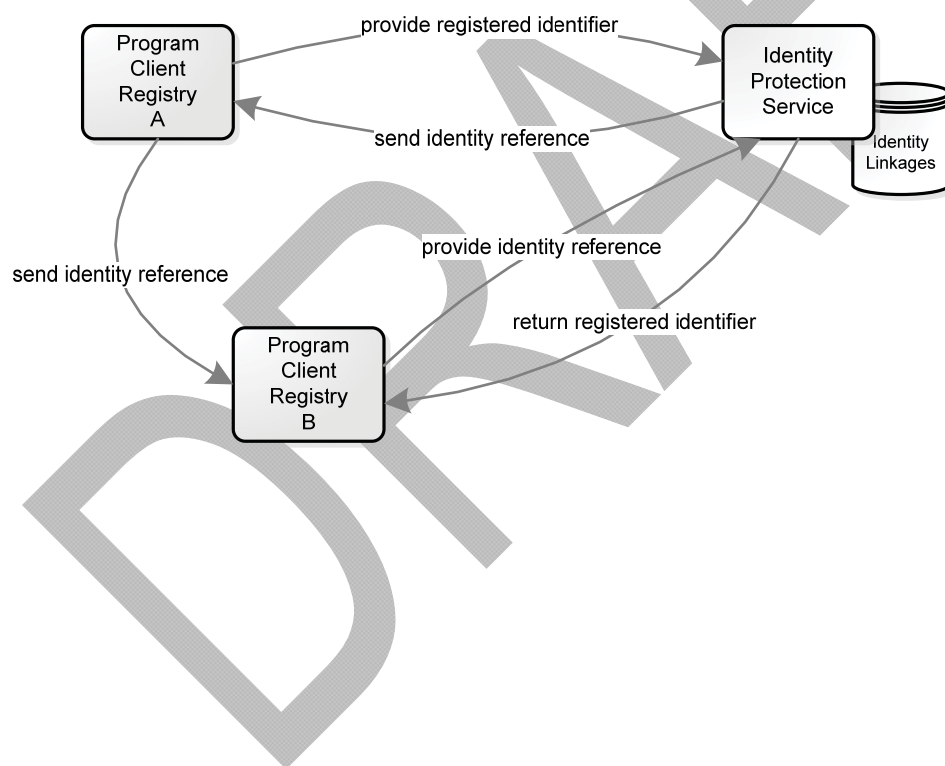


Figure 8 - Registering identifiers for a government program

This interaction is expected to occur at the same time as identity and credential information is registered by authoritative parties (registering organizations and credential issuers). For relying parties (program client registries belonging to online services and counter services), this interaction is expected to occur after an authentication event when an individual is known; an identity reference data element is provided as a claim to the relying party for this purpose.

### Translating Identifiers across Government Programs

The Identity Assurance Services facilitates two government programs sharing information about an individual (client) in common between the two programs. Some examples of such information sharing exchanges are when the corrections program needs health information about a corrections client, or when a social program needs to review the criminal history of a client. The authorization and auditing of these information sharing exchanges is out of scope of the IDIM program; the Identity Protection Service is involved only in translating identifiers from one program to another.



**From:** [Keay, Liz HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** MOH draft for you!  
**Date:** Tuesday, September 25, 2012 11:52:02 AM  
**Attachments:** [PIA MOH BCSC final for OIPC changes from OIPC Aug 24 2012 ek Sept 24 ISA Sept24 \(2\).docx](#)

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**Elizabeth Keay**

Sr Policy Analyst | Information Privacy & Legislation | Health Information Privacy, Security & Legislation  
Branch | Ministry of Health

3<sup>rd</sup> Floor – 1483 Douglas St | Victoria BC V8W 3K4

email: [liz.keay@gov.bc.ca](mailto:liz.keay@gov.bc.ca) | ph: 250-387-1290 | fax:250-356-2530

## PRIVACY IMPACT ASSESSMENT

### I BASIC INFORMATION - New or Existing Program, System or Legislation

#### 1. Ministry/Public Body and Program Area.

|                  |                                       |
|------------------|---------------------------------------|
| Ministry         | Ministry of Health                    |
| Division         | Health Sector IM/IT                   |
| Branch/Section   | Business Management Office            |
| Initiative Title | BC Services Card – Privacy & Security |

#### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

|                |                                                                        |
|----------------|------------------------------------------------------------------------|
| Name, Title    | Catherine Gale                                                         |
| Branch/Section | Business Management Office                                             |
| Phone Number   | 250-952-6207                                                           |
| E-Mail         | <a href="mailto:catherine.gale@gov.bc.ca">catherine.gale@gov.bc.ca</a> |

#### 3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

##### BC Services Card Program

On November 30, 2012, the Ministry of Health (MoH), the Ministry of Labour and Citizens' Services (LCTZ), and the Insurance Corporation of BC (ICBC) will launch a new credential for BC residents called the BC Services Card (BCSC.)

The BCSC will be rolled out to residents over 5 years and will initially be launched as a replacement for the MSP CareCard. The overarching vision for the BCSC is to provide BC residents with a highly secure credential that can enable safe and simple access to a variety of government programs and services, both in-person and on-line.

Most residents holding a valid BC Driver's License will be offered the opportunity to combine the BC Services Card with the BC Driver's Licence, however some may choose the stand-alone Photo Card.

Authority to deliver the BCSC Program across the partner organizations has been achieved through amendments to existing legislation, passed in 2011, including the ~~Medicare Protection Act [RSBC 1996 c 286] (MPA)~~, the ~~Freedom of Information and Protection of Privacy Act [RSBC 1996 c 165] (FOIPPA)~~, and the ~~Motor Vehicle Act [RSBC 1996 c 318] (MVA)~~.

##### Background – CareCard Replacement

The BC CareCard as it exists today is evidence of enrolment in the BC Medical Services Plan (MSP). The card itself has not been modified since 1989 and as such has not kept pace with advancements in security and identity management standards. With the goal of enhancing accountability in the management of the health benefits system within BC and reducing opportunity for fraud, there will be a new requirement for MSP enrollees to prove identity and to renew enrolment periodically, in addition to the existing requirement to prove residency in order to qualify for MSP benefits and obtain a BC Services Card.

To enable implementation of these changes within the health system, the BC CareCard replacement project was conceived with a goal to add rigour to the benefits enrolment process and replace the BC CareCard with a more secure and trustworthy credential. However, due to the recognized potential for addressing broader government service accessibility and citizen identity security needs, the project has evolved into a multi-organization initiative.

The re-envisioned initiative, now called the BC Services Card (BCSC) Project, will result in launch of a secure, coordinated, government identity information management program that in future will enable citizens to access a variety of government programs and services. The BCSC will initially be launched as a replacement for the BC CareCard. The BCSC will be issued by Labour and Citizens' Services (LCTZ) under authority of the *FOIPPA*, include a requirement for identity proofing, expiry and renewal at regular intervals and contains card security features equal to that of a Driver Licence, such as a photo of the cardholder.

Over the five-year transition to the BCSC, all BC citizens eligible for MSP will be required to re-enrol in MSP and obtain a BCSC. It is expected that 93%<sup>1</sup> of the 6.3 million estimated cards issued will involve an in-person identity proofing event at a front counter and result in issuance of BCSC photo identification. In addition to the enhanced security and validation processes inherent in the BCSC, one of the most significant changes for health care service providers will be the addition of a resident's photo to the benefits credential, enabling the service provider to visually match the health care recipient to the benefits card, thereby reducing opportunity for fraudulent use of the health benefits program and improving the integrity of medical records.

Implementation of the BCSC will leverage existing infrastructure within the public domain, including ICBC front counter, fraud detection and card production services in place for Driver Licensing and the BCID Card. Leverage of these established services for the new BCSC program will create a consistent practice for government sponsored identity validation and card lifecycle management and it will save start-up and ongoing program delivery costs. To enable sharing of the information collected for the purposes of MSP re-enrolment and account maintenance, and to take advantage of the existing front counter, identity validation and card production services from ICBC, amendments to the *MVA* and the *FOIPPA* were passed in 2011.

LCTZ and ICBC are in the process of developing companion PIAs to explain the purpose and privacy implications for the program components within their areas of responsibility. This MoH 'design-phase' PIA will focus on the relationship and information sharing requirements related to management of the

---

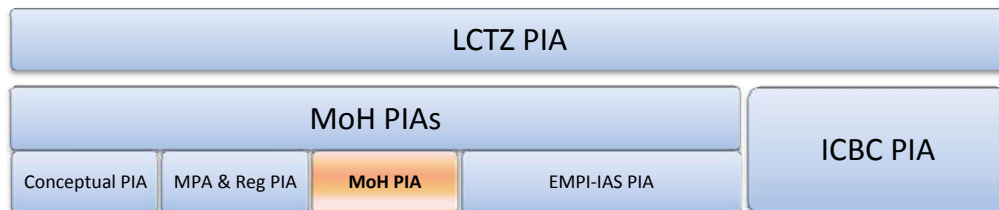
<sup>1</sup> Children, those in residential care and Seniors 75 years of age or older will be exempted from the in-person identity proofing requirement.



MSP benefits program, the changes resulting from the CareCard replacement and the impacts of integration with the broadened scope of the BCSC as a government program and service credential.

Diagram A. Partner Organizations (MoH, LCTZ & ICBC) – PIA structure

**Comment [11]:** Have added the EMPI-IAS PIA



|     |                                                                                                               | *Yes | No |
|-----|---------------------------------------------------------------------------------------------------------------|------|----|
| (a) | Does this PIA involve a common or integrated program/activity (as defined in the FOIPP Act)?                  | X    |    |
|     | Is the common or integrated program/activity confirmed by the written requirements set out in the regulation? | X    |    |
| (b) | Does this PIA involve a data-linking initiative (as defined in the FOIPP Act)?                                |      | X  |

**If yes, please ensure you have notified the Office of the Information and Privacy Commissioner at an early stage of development of the initiative pursuant to section 69 (5.5) of the FOIPP Act.**

The Ministry of Health, ICBC, and the Ministry of Labour and Citizens Services and Open Government have made presentations to the Office of the Information and Privacy Commissioner about the BCSC; the most recent was on July 4, 2012. The Office of the Information and Privacy Commissioner provided questions (and comments in a letter dated September 6, 2012): this PIA has been updated with these questions and comments.

#### 4. Purpose/Objectives of the initiative (if statutory, provide citation).

The Guiding Principles, section 5.1, within the *MPA* require that 'The [Medicare Services] Plan is publicly funded and operated on an accountable basis' (Section 5.2) and 'the plan is administered in a manner that is sustainable over the long term.' (Section 5.7) The goal of the BCSC Project will enable MoH to enhance alignment with these principles through replacement of the existing CareCard with a credential with enhanced security and identity assurance features that enable accountability improvements such as reducing opportunity for fraud within the health system, improving the integrity of medical records, and eventually, improving access to safe and secure services on-line.

The introduction of the BCSC will provide the following benefits to the health care system:

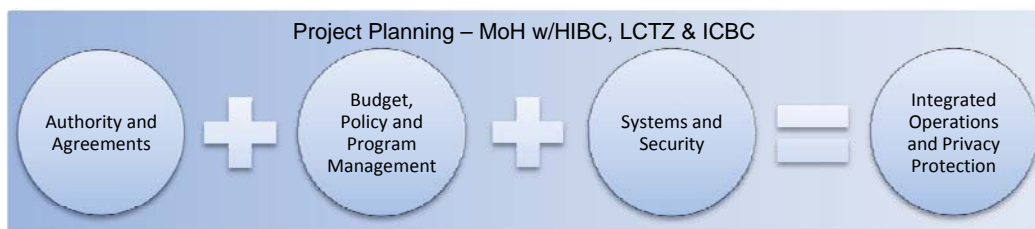
- By 2017, an estimated 93% of citizens will get a photo identification card which will be as secure as the existing Drivers Licence and BCID and will leverage technologies to prevent counterfeiting and other forms of fraud
- Rigorous identity proofing on application, introduction of ongoing expiry and re-enrolment process every five years, as well as highly secure tamper resistant chip technology and photo identification on the card will provide more accurate matching of individuals to their health records and will provide another level of assurance that only those eligible receive health benefits coverage from MSP, reducing potential for health system fraud and abuse; and
- Provides a path to the future vision of enabling secure, high assurance client identity for in-person and on-line government services, such as access to personal health information and other types of government information and services.

The new card will act as a primary component in the *Citizens @ the Centre: Government 2.0* strategy to provide citizens with secure and authorized access to electronic government services. The partnerships between LCTZ, ICBC and MoH will enable the development and launch of this new service and will be a foundational tool for use with on-line government services and to enable citizen self-service. While the program envisions a broader vision for the card in the context beyond health, this PIA is primarily focused on the health care services context.

#### 5. What are the potential impacts of this proposal? (Include privacy impacts in this description).

As the BCSC project involves establishment of a new authority for identity management for all of government (LCTZ) as well as integration of services among project partners (LCTZ, ICBC, MoH/HIBC) and changes to legislation, a significant amount of planning and coordination is in progress to enable the launch and ongoing operations of the new program. Below is a high-level overview of the areas impacted by the introduction of the BCSC.

Diagram B. Program Initiation and Integration Planning Areas



#### Authority and Agreements

In addition to legislative amendments to ~~the MPA, FOIPPA and MVA~~ that provide the legal authority and set the boundaries for the collection, storage, use and sharing of personal information, the integration of services between MoH (w/HIBC), ICBC and LCTZ will require an Integrated Program ~~Agreements~~ to ensure governance and responsibilities as well as direction and outcomes are clearly defined. Also in development are Information Sharing Agreements that specify the types and format of information to be shared, the circumstance and authority with which that information will be shared and the methodology to be used for information exchange, storage and utilization.

**Comment [12]:** Please check this is OK with IPA scope

~~Note: Should there be ISAs for the MSP beneficiary purpose, the application of ss. 31 & 33 of the MVA (change of address/name and production of license/duplicates) may need to be considered. Any ISAs meeting these provisions must be in place before collection, use and disclosure between ICBC and HIBC for MSP beneficiary purposes can happen.~~

### **Budget, Policy and Program Management**

Budget has been targeted for the initial five years of the project and enables appropriate resources to be allocated to manage implementation and address evolution of the program.

### **Systems and Security**

Architectural planning and system alignment between partner organizations is currently being undertaken and will ensure secure exchange, storage and access of information as required and bound by the FOIPPA, ~~MPA, and MVA~~ and related agreements and service delivery plans.

Point of Service information exchange will remain as it currently exists; enhancements will be addressed in future or related project PIAs. Card specifications, card lifecycle management and related privacy implications will be addressed in the LCTZ PIA.

The methods, technology and circumstance for information sharing will be defined and agreed to in the Information Sharing Agreements between the partner organizations.

### **Integrated Operations and Privacy Protection**

The foundation for enabling integrated operations and protection of privacy flow from legislative changes, the agreements and the policy and program management processes, implementation of systems and security enhancements and integrations, and establishment of budget and resources to support the new BCSC program.

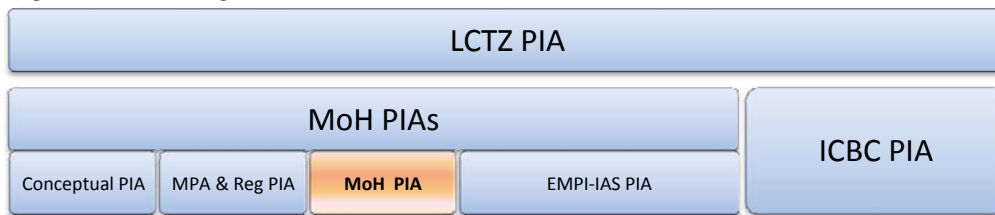
Where policy, processes and operations are changed, and in particular where personal information is impacted, ~~there will be a training will be~~ planned and coordinated ~~approach among the partners~~ to ensure appropriate application of revised ~~privacy~~ policy and program processes ~~such as~~.

- notification materials ~~(these will be appended to this PIA once finalized)~~
- privacy training
- incident and breach management
- privacy complaint management
- access to one's own information

~~Training details and impacts will be addressed in the MOH Design PIA update that will be developed.~~ In addition, there will be communication and stakeholder engagement plans and other plans as required.

### **6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

Diagram A. Partner Organizations – PIA structure



#### LCTZ PIA

This describes the BCSC project in general as an integrated program under FOIPPA, the relationship of the three partner PIAs and the ICBC information LCTZ collects and uses.

#### ICBC PIA

This describes the MoH/ICBC privacy issues and information flows as they relate to the Driver's Licence and the BCSC, and the information ICBC collects, uses and discloses to LCTZ.

#### MoH PIAs

MoH PIA – *current document*

This describes the MoH (HIBC)/ICBC privacy issues and the information flows as they relate to MSP Benefits program management and to the integrated BCSC program. *This PIA will be updated in a document called the Design PIA update to include further information on any supporting privacy-related policies and processes, as required, such as:*

- *notification materials*
- *privacy training*
- *incident and breach management*
- *privacy complaint management*
- *access to one's own information*

Conceptual PIA - *completed*

This assessment was written from a health sector perspective with a view to issuing a new health credential under the statutory authority of the *Medicare Protection Act* although the personal identity information sharing required to enable the role of LCTZ was included. The assessment was subsequently shared with the Office of the Privacy Commissioner (OIPC).

Medicare Protection Act PIA and Regulation PIA – *completed*

This PIA was for the amendments to the *Medicare Protection Act* in April 2011 and for the MPA Regulation in the spring of 2012.

Planning and Evaluation PIA - *completed*

This planning and evaluation project will determine the optimal criteria for confirming the alignment of data for individuals in ICBC and Ministry databases, in order to design two critical business processes, Notification and the Card Qualification Check. These two process checks will reduce the likelihood of privacy incidents in the future due to misidentification of individuals.

This PIA examines the similarity of the MSP beneficiary identifiers to the ICBC identifiers so information

can be exchanged efficiently and accurately. This will minimize potential privacy risks of mismatches between the MSP beneficiary identifier and the ICBC identifiers. The PIA was signed off by the OCIO and senior executive on June 7, 2012.

#### Related Projects PIAs – *to be developed*

There will be a PIA for the interface between Ministry of Health Client Registry ~~registries~~ ~~S~~systems and LCTZ where the PHN and other information is exchanged between the Enterprise Master Patient Index (EMPI) and the Identity Assurance Service (IAS). LCTZ is drafting this PIA: it will be reviewed by the Office of the Information and Privacy Commissioner. This PIA will be an appendix to the LCTZ PIA and to this PIA document.

There will be a separate PIA for Fraud and its information exchanges for identity fraud management, the BCSC Fraud PIA. LCTZ is taking the lead on this PIA with input from the partners. This PIA will be an appendix to the LCTZ PIA.

**Comment [13]:** To clarify if a PIA or an appendix

Other PIAs will be drafted as necessary as the BCSC project evolves.

**IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO [X. SIGNATURES](#).**

**\*\*IMPORTANT NOTE:** The FOIPP Act defines personal information as "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted.

## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the definition of personal information.] *For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

There are **two purposes** for the collection, use and disclosure of MSP beneficiary personal information:

1. MSP beneficiary enrolment, including issuance of a benefits card and management of the beneficiary account.
2. BCSC integrated program (IP) as established by LCTZ, the Provincial Identity Information Services Provider (PIISP), with the statutory authority to provide identity information management services to public and private bodies.

### **MSP Beneficiary Purpose**

MSP beneficiary information will be accessed to confirm qualification for benefits in order to confirm card eligibility and produce the following types of cards:

1. BCSC with a photo and Personal Health Number<sup>2</sup> (PHN) combined with a BC Driver's Licence (Combo Card)
2. BCSC with a photo and PHN (Standalone Photo Card)
3. BCSC without a photo and with a PHN (Non-Photo Card)

Exchange of information for the purposes of health benefits management will be limited to the minimum required for program management, citizen enrolment or re-enrolment in MSP and credential update [note: a credential update means card replacements and address updates]. In addition under the BCSC integrated program there is a requirement for partner organizations to access some health information.

Specifically, there will be a requirement to share the PHN with LCTZ and ICBC. To protect the integrity of the PHN, respect privacy laws and limit opportunities for unauthorized profiling, the sharing of the PHN will be restricted and controlled. The PHN on the current CareCard is used to access health care services; the PHN on the BCSC will also be used to access health care. The PHN will be shared with ICBC and LCTZ in the following limited circumstances:

- Where the BC CareCard is used as evidence of identity for obtaining a BCSC or BCDL/BCID.
- To enable the printing of the PHN on the BCSC or combo card.

The Ministry of Health, through its contracted service provider, HIBC/MAXIMUS, is responsible for administering MSP enrollment and data elements, and eligibility requirements for MSP, and reporting incidents of identity fraud.

<sup>2</sup> A unique, numerical, lifetime identifier used in the specific identification of an individual client or patient who has had any interaction with the British Columbia health system. It is assigned only to and used by one person and will not be assigned to any other person.

Note: the last HIBC collection and use of personal information for the outgoing CareCard will be approximately November 23, 2012.

The methods, technology and circumstance for information sharing will be defined and agreed to in the Information Sharing Agreements between the partner organizations.

#### **Integrated Program (IP) Purpose**

For the Ministry of Health, the IP purpose means there will be a secure CareCard replacement for MSP beneficiaries. This will help ensure that medically necessary services provided to a given beneficiary will be for the beneficiary on the card and not someone else. The IP information flows between HIBC and ICBC relevant to MSP beneficiaries are:

- Notification
- Identity proofing, especially the non-photo card
- Card issuance, renewal, and ~~recovery~~ removal of expired or invalid cards from circulation
- Fraud Management (please note that the information flows for identity theft ~~Fraud Management have not been finalised and will be presented in a separate Fraud later version of this PIA~~). Fraud identification is an extremely important component of the new BCSC program, both at the time of issuing the card and as the card is used. Please refer to the LCTZ's PIA appendix, the Fraud PIA, for a full evaluation of the information exchanges for identity fraud management.

**Comment [I4]:** To be clarified if a PIA or an appendix

~~The legal authorities for the IP Purpose are in Appendix E.~~

**2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

The following acronyms are used in the tables:

|                                                    |                                         |
|----------------------------------------------------|-----------------------------------------|
| COIP - Common or Integrated Program                | IAS – Identity Assurance Services       |
| DLO – Driver Licence Office                        | PIISP – Provincial Identity Information |
| Service Provider                                   |                                         |
| FOIPPA - Freedom of Information and Protection Act | MVA – Motor Vehicle Act                 |
| HIBC – Health Insurance BC                         | PAN - Primary Account Number            |
| (embedded in the chip of the card)                 |                                         |

For a full description of the different identifiers and what they represent please see Appendix D

**Photo Card (Combo and Standalone)**

| Sequence                                                                                                                                                                      | Action                                   | Elements                                                                                                     | Authority                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. NOTICE - Individual receives notice from ICBC that it is time to renew DL or BCID and enrol for new BCSC and MSP                                                           | Collection Notice (include BCSC Program) |                                                                                                              | s.27(2) FOIPPA (Notice Requirement)                                                                                                                                                                           |
| 2. ICBC sends personal information to HIBC who uses it to generate an additional MSP re-enrolment notification and additional notice about the BCSC Program enrolment         | Disclosure ICBC to HIBC                  | Card Type: DL\BCID<br>Name<br>Sex<br>DOB                                                                     | s.33.2(d) FOIPPA (COIP)<br>→ information is necessary for HIBC to provide notice to MSP clients about renewing MSP and about the BCSC Program enrolment                                                       |
|                                                                                                                                                                               | Indirect Collection HIBC from ICBC       | DL Address<br>BCID Address<br>Card Issue Date<br>Card Expiry Date                                            | s.26(c) FOIPPA (COIP)<br>s.27(1)(b)/ 27(1)(e) (COIP) FOIPPA                                                                                                                                                   |
|                                                                                                                                                                               | HIBC Use                                 | <i>And where applicable:</i><br>Card Address<br>Change Date<br>PHN                                           | s.32(a) and (c) FOIPPA                                                                                                                                                                                        |
| 3. Individual attends a DLO to renew DL or BCID, re-enrol in MSP and obtain a BCSC<br><br>At the DLO Required identity information is collected directly from the individual. | Direct Collection by ICBC                | Name<br>Sex<br>DOB<br>Address<br>Photo<br>PHN<br>Residency attestation (y/n)<br><br><i>Identity Proofing</i> | <u>DL/BCID</u> (out of scope)<br>s.26(a)(and (c) FOIPPA<br>s.25 MVA<br><br>s.26(c) FOIPPA (COIP)<br>→ BCSC Program (COIP) Collection for- determining eligibility for the BCSC which includes MSP information |



|                                                                                                                                                                                                                   |                                       |                                                                                                                                                                                                                                  |                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                   |                                       | <i>Information:</i><br>Primary Doc Type,<br>Primary Doc Identifier,<br>Secondary Doc Type, Secondary Doc Identifier<br><br><u>DL/BCID Only</u><br>(not provided to PIISP or HIBC)<br>Eye color<br>Hair color<br>Weight<br>Height |                                                                                                                                                                     |
| 4. CARD QUALIFICATION CHECK<br>a. ICBC Customer Service Representative sends HIBC a request to determine if the customer presenting at the counter is eligible for MSP and therefore qualifies to receive a BCSC. | Disclosure by ICBC to HIBC            | Name<br>Sex<br>DOB                                                                                                                                                                                                               | s.33.2(d) FOIPPA (COIP)<br>→ information to have HIBC confirm that client is eligible for MSP and a BCSC                                                            |
|                                                                                                                                                                                                                   | Indirect Collection by HIBC from ICBC | PHN<br>Residency attestation (y/n)                                                                                                                                                                                               | s.26(c) FOIPPA (COIP)<br>s.27(1)(b) / 27(1)(e) (COIP) FOIPPA                                                                                                        |
|                                                                                                                                                                                                                   | HIBC Use                              | <i>And where applicable:</i><br>Client's Previous Name<br>Previous Sex<br>Previous DOB                                                                                                                                           | s.32(a) and (c) FOIPPA<br>CARD QUALIFICATION CHECK – (MSP beneficiary record matches information provided by ICBC – either PHN exactly or person matching criteria) |
| 4. CARD QUALIFICATION CHECK<br>b. PASS CQC - HIBC confirms whether eligible for MSP and BCSC card and provides PHN (if matched) associated with the individual for card production.                               | Disclosure by HIBC to ICBC            | PHN<br>Eligibility Confirmation (y/n)<br>MSP Coverage Effective Date                                                                                                                                                             | s.33.2(d) FOIPPA (COIP)<br>→ HIBC confirms that client is eligible for MSP and BCSC and confirms PHN to go on card                                                  |
|                                                                                                                                                                                                                   | Indirect Collection by ICBC from HIBC |                                                                                                                                                                                                                                  | s.26(c) FOIPPA (COIP)<br>s.27(1)(b)/ 27(1)(e) (COIP) FOIPPA                                                                                                         |
|                                                                                                                                                                                                                   | ICBC Use                              |                                                                                                                                                                                                                                  | s.32(a) and (c) FOIPPA                                                                                                                                              |
| 4. CARD QUALIFICATION CHECK<br>c. FAIL CQC – HIBC places a MSP hold and releases hold when issue resolved (e.g., coverage no longer valid, temporary doc holder)                                                  | Disclosure by HIBC to ICBC            | Place a hold on photo card production                                                                                                                                                                                            | s.33.2(d) FOIPPA (COIP)<br>→ HIBC notifies that client may not be eligible for MSP and a BCSC                                                                       |
|                                                                                                                                                                                                                   | Indirect Collection by ICBC from HIBC |                                                                                                                                                                                                                                  | s.26(c) FOIPPA (COIP)<br>s.27(1)(b)/ 27(1)(e) (COIP) FOIPPA                                                                                                         |
|                                                                                                                                                                                                                   | ICBC Use                              |                                                                                                                                                                                                                                  | s.32(a) and (c) FOIPPA                                                                                                                                              |
| 5. Completion of ICBC identity management and fraud checks (facial recognition processes)                                                                                                                         | Internal ICBC process                 |                                                                                                                                                                                                                                  | s.32(a) FOIPPA                                                                                                                                                      |
| 6. ICBC notifies HIBC of identity proofing event                                                                                                                                                                  | Disclosure by ICBC to                 | Name<br>Sex                                                                                                                                                                                                                      | s.33.2(d) FOIPPA (COIP)<br>→ intention to recommend issuance of BCSC                                                                                                |

|                                                                                   |                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                              |
|-----------------------------------------------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| , including the information about the client and the outcome of the counter visit | HIBC                                  | DOB                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                              |
|                                                                                   | Indirect Collection by HIBC from ICBC | PHN<br>Card Expiry Date<br>Address<br>Card Type<br>Residency<br>attestation (y/n)<br>ID Proof Ref # <sup>3</sup><br>ICBC Client Identifier<br>Event Date/Time<br><br><i>Identity Proofing Information:</i><br>Primary Doc Type<br>Primary Doc Identifier<br>Secondary Doc Type<br>Secondary Doc Identifier (excluding credit cards)<br><br><i>And where applicable:</i><br>Counter Holds<br>CQC Error<br>Client's Previous Name<br>Previous Sex<br>Previous DOB | s.26(c) FOIPPA (COIP)<br>s.27(1)(b) / 27(1)(e) (COIP) FOIPPA |
| 7. Card production occurs - Completed card(s) mailed to the citizen               |                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                              |

<sup>3</sup> ID Proof # - If a customer is not eligible for a combo card, this number is provided by ICBC to a customer on their receipt and to HIBC. This allows the customer to prove to HIBC that they have been identity proofed at an ICBC counter.

Note: The ID Proof Reference number is printed on the ICBC receipt, and is transmitted to HIBC, and is used in situations where the HIBC response to a 'Card Qualification Check' is a 'No'. The caller will provide this number to HIBC to match the reference number with the transaction to allow HIBC to search the HIBC data base, find the record and assess the reason for the failure of the Card Qualification Check

For the combo and standalone BCSC cards, ICBC scans identity-proofing documents at the counter; what is done with these electronic copies and are they disclosed to any other partners in the BCSC program? ICBC only scans identity-proofing documents at the counter for the Enhanced Driver Licence and Enhanced ID cards program, which is not part of the BCSC program. For the BCSC (combo and standalone), no identity proofing documents will be scanned and stored. Only the type of primary & secondary identification that is presented is recorded along with the identifying number on the identification document. For example, if a customer presents his/her Birth Certificate as primary identification then ICBC records that the Birth Certificate was presented and the Birth Certificate number is entered into the system. The type of identity document and the identifier is shared with HIBC & LCTZ.

|                                                                                                                                                                   |                                              |                                                                                                                                                                                                                                                         |                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8. ICBC sends relevant identity information and card information to PIISP/IAS                                                                                     | Disclosure by ICBC to PIISP                  | Name<br>Sex<br>DOB                                                                                                                                                                                                                                      | s.33.2(d) FOIPPA – (COIP)<br>→ ICBC can share information with LCTZ as it is necessary as part of registration into the BCSC Program<br>Also authorized by :<br>s.33.1(6)(b)/69.2(2)(d) FOIPPA |
|                                                                                                                                                                   | Indirect Collection by PIISP from ICBC       | Photo<br>Address<br>PHN<br>ICBC Client Identifier                                                                                                                                                                                                       | s.26(h)(i) FOIPPA<br>s.27(1)(g) / 27(1)(e) (COIP) FOIPPA                                                                                                                                       |
|                                                                                                                                                                   | PIISP Use                                    | <i>Identity Proofing Information:</i><br>Primary Doc Type<br>Primary Doc Identifier<br>Secondary Doc Type<br><br><i>Card Information:</i><br>Card Type<br>Card Serial Number<br>Card Issue Date<br>Card Expiry Date<br>Encrypted PAN<br>PAN Expiry Date | s.32(a) and (c) FOIPPA<br>PIISP will provide identity information management services to BC citizens (as set out in FOIPPA s.69(2)(1))                                                         |
| <b>The PIISP/IAS sends information to MoH's Health Client Information Management Registry. Please see PIA in Appendix B for full evaluation of this exchange.</b> |                                              |                                                                                                                                                                                                                                                         |                                                                                                                                                                                                |
| 9. ICBC sends card production information to HIBC – includes holds, including identity and fraud holds                                                            | Indirect Collection HIBC from ICBC           | Name<br>Address<br>PHN<br>ID Proof Ref                                                                                                                                                                                                                  | s.26(c) FOIPPA (COIP)<br>s.27(1)(b) FOIPPA                                                                                                                                                     |
|                                                                                                                                                                   | ICBC discloses to HIBC                       | Event Type<br>Event date/time<br><br><i>Card information:</i><br>Card Type<br>Card Serial Number                                                                                                                                                        | s.33.2(d) (COIP) FOIPPA<br>→ confirm for HIBC who has received a BCSC                                                                                                                          |
| 10. Returned mail notification ICBC notifies HIBC about returned Combo/photo cards                                                                                | ICBC discloses to HIBC and PIISP             | Card Serial Number<br>Card Returned Date<br>Card Status                                                                                                                                                                                                 | s.33.2(d) (COIP) FOIPPA<br>→ confirm for HIBC who has received a BCSC                                                                                                                          |
|                                                                                                                                                                   | Indirect Collection HIBC and PIISP from ICBC | Re-sent Mailing<br>Address<br>Re-sent Date                                                                                                                                                                                                              | s.26(c) FOIPPA (COIP)<br>s.27(1)(b) FOIPPA                                                                                                                                                     |
| <b>Full a full discussion of the exchanges of personal information related to identity fraud management please refer to the BCSC Fraud PIA.</b>                   |                                              |                                                                                                                                                                                                                                                         |                                                                                                                                                                                                |

## Non photo Card

| Sequence                                                                                                                                                                                                                                                                                                                       | Action                                                                  | Elements                                                                                                                                                                                  | Authority                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| 1. Individual sends application to MoH (HIBC) to enrol or re-enrol in MSP and get a non-photo BCSC. HIBC collects identity information and scans photocopied identity documents. <i>This is a mail-in process only.</i><br><br>Two purposes for collection :<br>i. MSP enrolment (including residency attestation)<br>ii. BCSC | Direct collection by HIBC from individual                               | See MSP online forms <sup>4</sup>                                                                                                                                                         | s.26(c) FOIPPA – (COIP)<br>(MSP enrolment and BCSC Program)                                                            |
| 2. HIBC generates a new PHN OR links application to existing PHN; and generates issue & expiry dates                                                                                                                                                                                                                           | Use                                                                     |                                                                                                                                                                                           | s.32(a) FOIPPA                                                                                                         |
| 3. HIBC provides ICBC with required identity information <sup>5</sup> to produce the non-photo BCSC.                                                                                                                                                                                                                           | Disclosure by HIBC to ICBC<br><br>Indirect Collection by ICBC from HIBC | Name<br>Sex<br>DOB<br>Address<br>PHN<br>MSP Coverage<br>Effective Date<br><br><i>Card information:</i><br>Card Type<br>Duplicate Flag <sup>6</sup><br>Card Issue Date<br>Card Expiry Date | s.33.2(d)- COIP<br>→necessary for ICBC to produce the non photo BCSC<br><br>s.26(c) FOIPPA (COIP)<br>s.27(1)(b) FOIPPA |

<sup>4</sup> This is the link for the MSP forms <https://www.health.gov.bc.ca/exforms/msp.html#2811b>

<sup>5</sup> HIBC is indirectly collecting identity proofing information from ICBC because: In the event that someone goes to an ICBC counter and the Card Qualification Check (CQC) fails, the individual will be asked to contact HIBC to resolve the issue. Having the identity proofing document type and numbers will help HIBC resolve where there is a discrepancy between HIBC and ICBC data and ensure that the right PHN is provided for the right person. The information is also needed in the event of an investigation. HIBC scans mailed-in copies. These are not disclosed to other partners in the Integrated Program and are stored in a system with access control (User ID and Password) for authorized users to process in the course of their work. The scanned image data retention and destruction is according to an approved Operational Records Classification Schedule (ORCS).

<sup>5</sup> Reason for a duplicate card: A duplicate licence is issued to someone who loses their card or makes changes to the tombstone data such as name, gender, date of birth. The duplicate supersedes the original licences or renewals and the last card issued is the one police will have information for. The same scenario will apply for the BCSC (combo and standalone). For the non-photo standalone card for those under 19 years of age there can be duplicate cards for children in split families.

<sup>6</sup> Reason for a duplicate card: A duplicate licence is issued to someone who loses their card or makes changes to the tombstone data such as name, gender, date of birth. The duplicate supersedes the original licences or renewals and the last card issued is the one police will have information for. The same scenario will apply for the BCSC (combo and standalone). For the non-photo standalone card for those under 19 years of age there can be duplicate cards for children in split families.

|                                                                                                                                                                   |                                        |                                                                                                                                                   |                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                   |                                        | Card Issuance Request Number<br>[unique # assigned by HIBC for non photo]                                                                         |                                                                                                                                                                                                |
| 4. Card production occurs - Completed card(s) mailed to the citizen                                                                                               |                                        |                                                                                                                                                   |                                                                                                                                                                                                |
| 5. ICBC sends relevant identity information and card information to PIISP/IAS                                                                                     | Disclosure by ICBC to PIISP            | Name<br>Sex<br>DOB<br>Address<br>PHN<br>ICBC Client Identifier                                                                                    | s.33.2(d) FOIPPA – (COIP)<br>→ ICBC can share information with LCTZ as it is necessary as part of registration into the BCSC Program<br>Also authorized by :<br>s.33.1(6)(b)/69.2(2)(d) FOIPPA |
|                                                                                                                                                                   | Indirect Collection by PIISP from ICBC |                                                                                                                                                   | s.26(h)(i) FOIPPA<br>s.27(1)(g) / 27(1)(e) (COIP) FOIPPA                                                                                                                                       |
|                                                                                                                                                                   | PIISP Use                              | Card information:<br>Card Type<br>Card Serial Number<br>Duplicate Flag<br>Card Issue Date<br>Card Expiry Date<br>Encrypted PAN<br>PAN Expiry Date | s.26(h)(i) FOIPPA<br>s.27(1)(g) / 27(1)(e) (COIP) FOIPPA                                                                                                                                       |
| <b>The PIISP/IAS sends information to MoH's Health Client Information Management Registry. Please see PIA in Appendix B for full evaluation of this exchange.</b> |                                        |                                                                                                                                                   |                                                                                                                                                                                                |
| 6. ICBC sends card production information to HIBC                                                                                                                 | ICBC discloses to HIBC                 | Name<br>Address<br>PHN                                                                                                                            | s.33.2(d) (COIP) FOIPPA<br>→ confirm for HIBC who has received a BCSC                                                                                                                          |
|                                                                                                                                                                   | Indirect Collection HIBC from ICBC     | Card Issuance Request Number<br>Event Type<br>Event date/time<br><br>Card information:<br>Card Type<br>Card Serial Number                         | s.26(c) FOIPPA (COIP)<br>s.27(1)(b) FOIPPA                                                                                                                                                     |
| 7. Returned mail notification ICBC notifies HIBC about returned non-photo cards                                                                                   | ICBC discloses to HIBC                 | Card Serial Number<br>Card Returned Date<br>Card Status                                                                                           | s.33.2(d) (COIP) FOIPPA<br>→ confirm for HIBC who has received a BCSC                                                                                                                          |
|                                                                                                                                                                   | Indirect Collection HIBC from ICBC     | Re-sent Mailing<br>Address<br>Re-sent Date                                                                                                        | s.26(c) FOIPPA (COIP)<br>s.27(1)(b) FOIPPA                                                                                                                                                     |
| <b>Full a full discussion of the exchanges of personal information related to identity fraud management please refer to the BCSC Fraud PIA.</b>                   |                                        |                                                                                                                                                   |                                                                                                                                                                                                |

### Legislative Authorities: MSP Beneficiary Purpose

The legal authorities for the data exchanges for the MSP beneficiary purpose are described in the following tables (one for the photo card and one for the non photo card).

### **Photo Card Authorities Table**

**Note:** the following steps in the LCTZ and ICBC PIAs have been deleted as they are not MOH steps:

- 7. Card production occurs
- 9. ICBC sends relevant identity information to PIISP/IAS

The following acronyms are used in the tables:

DLO — Driver Licence Office

FOIPPA — Freedom of Information and Protection Act

HIBC — Health Insurance BC

MPA — Medicare Protection Act

MVA — Motor Vehicle Act

**Note: details about the information flows are found in the following section, 2, of the PIA**

| Sequence                                                                                                                                                              | Action                             | Elements                                                                                                                                                               | Authority                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Notification [information flow 1 Section 2]</b>                                                                                                                    |                                    |                                                                                                                                                                        |                                                                                                                                                                                                    |
| 1. NOTICE – Individual receives notice to renew from ICBC that it is time to renew DL or BCID and re-enroll in MSP and for the new BCSC                               | Notice (include BCSC Program)      |                                                                                                                                                                        | Notification Requirement: MSP (re)enrollment<br>FOIPPA s. 27(2)                                                                                                                                    |
| 2. ICBC sends personal information to HIBC who uses it to generate an additional MSP re-enrolment notification and additional notice about the BCSC Program enrolment | Disclosure ICBC to HIBC            | Card Type: DL\BCID, Name, Sex, DOB, DL Address, BCID Address, Card Issue Date<br>Card Expiry Date<br><br><i>And where applicable:</i><br>Card Address Change Date, PHN | D: purpose: MSP (re)enrollment: information is necessary for HIBC to provide notice to MSP clients about renewing MSP<br>FOIPPA s. 33.1(1)(d) [MVA s. 25.02(1)(b) /MPA s. 5 & 6<br>→set out in ISA |
|                                                                                                                                                                       | Indirect Collection HIBC from ICBC |                                                                                                                                                                        | Indirect C: purpose: MSP (re)enrollment<br>FOIPPA s. 26 (a) and (c) [MPA s. 5 & 6]<br>FOIPPA s. 27(1)(b)<br>→set out in ISA                                                                        |
|                                                                                                                                                                       | HIBC Use                           |                                                                                                                                                                        | U: purpose: MSP enrollment<br>FOIPPA s. 32(a) and (c)                                                                                                                                              |
| <b>Card Qualification Check [information flow 2 Section 2]</b>                                                                                                        |                                    |                                                                                                                                                                        |                                                                                                                                                                                                    |
| 3. Individual attends a DLO to renew DL or BCID, re-enroll in MSP and obtain a BCSC<br><br>At the DLO Required identity information is                                | Direct Collection by ICBC          | Name, Sex, DOB, Address, Photo, PHN, Residency attestation (y/n)<br><br><i>Identity Proofing</i>                                                                       | Direct C: purpose: MSP (re)enrollment eligibility<br>FOIPPA s. 26(c) [MPA 5& 6], MVA 25.02(1)(b)}                                                                                                  |

|                                                                                                                                                                                                                   |                                       |                                                                                                                                                                                                         |                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| collected directly from the individual.                                                                                                                                                                           |                                       | Information: Primary Doc Type, Primary Doc Identifier, Secondary Doc Type, Secondary Doc Identifier<br><br><u>DL/BCID Only</u><br>(not provided to PIHP or HIBC); Eye color, Hair color, Weight, Height | →set out in ISA                                                                                                                                                          |
| 4. CARD QUALIFICATION CHECK<br>a. ICBC Customer Service Representative sends HIBC a request to determine if the customer presenting at the counter is eligible for MSP and therefore qualifies to receive a BCSC. | Disclosure by ICBC to HIBC            | Name, Sex, DOB, PHN, Residency attestation (y/n)<br><br>And where applicable: Client's Previous Name, Previous Sex, Previous DOB                                                                        | D: purpose: MSP (re)enrollment/eligibility<br>FOIPPA s. 33.2(a)<br>FOIPPA s. 33.1(1)(d)/ MVA s. 25.02(1)(b)/MPA s. 5& 6,<br>→set out in ISA                              |
|                                                                                                                                                                                                                   | Indirect Collection by HIBC from ICBC |                                                                                                                                                                                                         | Indirect C: purpose: MSP (re)enrollment<br>FOIPPA s. 26 (a) and (c) [MPA s. 5& 6],<br>FOIPPA s. 27(1)(b)<br>→set out in ISA                                              |
|                                                                                                                                                                                                                   | HIBC Use                              |                                                                                                                                                                                                         | U: purpose: MSP enrollment<br>FOIPPA s. 32(a) and (c)<br>MSP beneficiary record agrees with information provided by ICBC—either PHN exactly or person matching criteria) |
| 4. CARD QUALIFICATION CHECK<br>b. PASS CQC—HIBC confirms whether eligible for MSP and BCSC card and provides PHN (if matched) associated with the individual for card production.                                 | Disclosure by HIBC to ICBC            | PHN, Eligibility Confirmation (y/n), MSP Coverage Effective Date                                                                                                                                        | D: purpose: MSP (re)enrolment: HIBC confirms that client is eligible for MSP and confirms PHN to go on card<br>FOIPPA s. 33.1(1)(d) [MPA s. 5 & 6],<br>→set out in ISA   |
|                                                                                                                                                                                                                   | Indirect Collection by ICBC from HIBC |                                                                                                                                                                                                         | Indirect C: purpose: MSP (re)enrollment<br>FOIPPA s. 26(a) [MVA 25(1.3), s. 26(c) 27(1)(b)<br>→set out in ISA                                                            |
|                                                                                                                                                                                                                   | ICBC Use                              |                                                                                                                                                                                                         | U: purpose: MSP (re)enrollment<br>FOIPPA s. 32(a) and (c)                                                                                                                |
| 4. CARD QUALIFICATION CHECK<br>c. FAIL CQC—HIBC places a MSP hold and releases hold when issue resolved (e.g., coverage no longer valid, temporary doc holder                                                     | Disclosure by HIBC to ICBC            | Place a hold on photo card production                                                                                                                                                                   | D: purpose: MSP (re)enrollment<br>FOIPPA s. 33.1(1)(d) [MPA s. 5 & 6],<br>→set out in ISA                                                                                |
|                                                                                                                                                                                                                   | Indirect Collection by ICBC from HIBC |                                                                                                                                                                                                         | Indirect C: purpose: MSP (re)enrolment: HIBC notifies that client may not be eligible for MSP<br>FOIPPA s. 26(a) [MVA 25(1.3), s. 26(c) 27(1)(b)<br>→set out in ISA      |
|                                                                                                                                                                                                                   | ICBC Use                              |                                                                                                                                                                                                         | U: purpose: MSP (re)enrollment<br>FOIPPA s. 32(a) and (c)                                                                                                                |
| 5. Completion of ICBC                                                                                                                                                                                             | Internal ICBC                         | Note: Fraud                                                                                                                                                                                             | FOIPPA s. 32(a)                                                                                                                                                          |

|                                                                                                                                   |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| identity management and fraud checks (facial recognition processes)                                                               | process                            | Management steps and authorities to be clarified further                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                   |
| <b>Identity Proofing Event [information flow 3 Section 2]</b>                                                                     |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                   |
| 6. ICBC notifies HIBC of identity proofing event, including the information about the client and the outcome of the counter visit | Disclosure by ICBC to HIBC         | Name, Sex, DOB, PHN, Card Expiry Date, Address, Card Type, Residency attestation (y/n), ID Proof Ref # <sup>7</sup> , ICBC Client Identifier, Event Date/Time<br><br><i>Identity Proofing Information:</i> Primary Doc Type, Primary Doc Identifier, Secondary Doc Type, Secondary Doc Identifier, (excluding credit cards)<br><br><i>And where applicable:</i> Counter Holds, CQC Error, Client's Previous Name, Previous Sex, Previous DOB | D: purpose: MSP (re)enrollment/eligibility FOIPPA s. 33.2(a) FOIPPA s. 33.1(1)(d) / MVA s. 25.02(1)(b) / MPA s. s. 5 & 6, → set out in ISA                                        |
| 7. Completed card(s) mailed to citizen                                                                                            |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                   |
| <b>Card Request Update [information flow 5 Section 2]</b>                                                                         |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                   |
| 8. ICBC sends card production information to HIBC — includes holds, including identity and fraud holds                            | Disclosure by ICBC to MoH          | Name, Address, PHN, ID Proof Ref, Event Type, Event date/time<br><br><i>Card information:</i> Card Type, Card Serial Number                                                                                                                                                                                                                                                                                                                  | D: purpose: MSP (re)enrollment/eligibility: confirm for HIBC who has received a BCSC FOIPPA s. 33.2(a) FOIPPA s. 33.1(1)(d) / MVA s. 25.02(1)(b) / MPA s. 5 & 6, → set out in ISA |
|                                                                                                                                   | Indirect Collection HIBC from ICBC |                                                                                                                                                                                                                                                                                                                                                                                                                                              | Indirect C: purpose: MSP (re)enrollment FOIPPA s. 26 (a) and (c) [MPA s. 5 & 6], FOIPPA s. 27(1)(b) → set out in ISA                                                              |
| <b>Returned Mail Notification [information flow 6 Section 2]</b>                                                                  |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                   |

<sup>7</sup> -ID Proof # — If a customer is not eligible for a combo card, this number is provided by ICBC to a customer on their receipt and to HIBC. This allows the customer to prove to HIBC that they have been identity proofed at an ICBC counter.



|                                                                                   |                                    |                                                                                            |                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------|------------------------------------|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9- Returned mail notification ICBC notifies HIBC about returned combo/photo cards | ICBC discloses to HIBC             | Card Serial Number, Card Returned Date, Card Status, Re-sent Mailing Address, Re-sent Date | D: purpose: MSP (re)enrollment/eligibility: confirm for HIBC who has received a BCSC<br>FOIPPA s. 33.2(a)<br>FOIPPA s. 33.1(1)(d)/ MVA s. 25.02(1)(b)/MPA s. 5 & 6<br>→set out in ISA |
|                                                                                   | Indirect Collection HIBC from ICBC |                                                                                            | Indirect C: purpose: MSP (re)enrollment<br>FOIPPA s. 26 (a) and (c) [MPA s. 5 & 6],<br>FOIPPA s. 27(1)(b)<br>→set out in ISA                                                          |

#### Address Change [information flow 7 Section 2]

|                                           |                                    |                                                                                                                                                        |                                                                                                                                             |
|-------------------------------------------|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| 10- ICBC notifies HIBC of address changes | ICBC discloses to HIBC             | Address Change Date, PHN, Card Serial Number, Surname, First Given Name, Second Given Name, Third Given Name, Gender, Date of Birth, Address Structure | D: purpose: MSP (re)enrollment/eligibility<br>FOIPPA s. 33.2(a)<br>FOIPPA s. 33.1(1)(d)/ MVA s. 25.02(1)(b)/MPA s. 5 & 6<br>→set out in ISA |
|                                           | Indirect Collection HIBC from ICBC |                                                                                                                                                        | Indirect C: purpose: MSP (re)enrollment<br>FOIPPA s. 26 (a) and (c) [MPA s. 5 & 6],<br>FOIPPA s. 27(1)(b)<br>→set out in ISA                |

#### Non Photo Card Authorities Table

**Note:** this table provides the legal authorities for information flow 4 Request Issuance of a Card, please see section 2 below for details.

**Note:** this is the link for the MSP forms: <https://www.health.gov.bc.ca/exforms/msp.html#2811b>

| Sequence                                                                                                                                                                         | Action                                    | Elements                                                                                                                                                     | Authority                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1- Individual sends application to MoH (HIBC) to enroll or re-enrol in MSP and get a non-photo BCSC. HIBC collects identity information and scans photocopied identity documents | Direct collection by HIBC from individual | See MSP online forms                                                                                                                                         | Direct C: purpose: MSP (re)enrollment<br>FOIPPA s. 26(a) [MPA s. 5(1)(e), 5(1)(f), 7], & s. 26(c)                                                             |
| 2- HIBC generates a new PHN OR links application to existing PHN; and generates issues & expiry dates                                                                            | HIBC Use                                  |                                                                                                                                                              | U: FOIPPA s. 32(a)                                                                                                                                            |
| 3- HIBC provides ICBC with required identity information to produce the non-photo BCSC.                                                                                          | Disclosure by HIBC to ICBC                | Name, Sex, DOB, Address, PHN, MSP Coverage Effective Date<br><br><i>Card information:</i> Card Type, Duplicate Flag, Card Issue Date, Card Expiry Date, Card | D: purposes: MSP (re)enrollment necessary for ICBC to produce the non photo BCSC<br>FOIPPA s. 33.2(a), s. 33.1(1)(c) FOIPPA [MPA s. 5 & 6]<br>→set out in ISA |
|                                                                                                                                                                                  | Indirect                                  |                                                                                                                                                              | Indirect C: purpose: MSP                                                                                                                                      |

|                                                                                 |                                    |                                                                                                                                      |                                                                                                                                                                                         |
|---------------------------------------------------------------------------------|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                 | Collection by ICBC from HIBC       | Issuance Request Number [unique # assigned by HIBC for non-photo]                                                                    | (re)enrollment<br>FOIPPA s. 26(a) [MVA 25(1.3)], s. 26(c) 27(1)(b)<br>→set out in ISA                                                                                                   |
| 4. Completed card(s) mailed to the citizen                                      |                                    |                                                                                                                                      |                                                                                                                                                                                         |
| 5. ICBC sends card production information to HIBC                               | ICBC discloses to HIBC             | Name, Address, PHN, Card Issuance Request Number, Event Type, Event date/time<br><br>Card information: Card Type, Card Serial Number | D: purpose: MSP (re)enrollment/eligibility: confirm for HIBC who has received a BCSC<br>FOIPPA s. 33.2(a)<br>FOIPPA s. 33.1(1)(d)/ MVA s. 25.02(1)(b) /MPA s. 5 & 6;<br>→set out in ISA |
|                                                                                 | Indirect Collection HIBC from ICBC |                                                                                                                                      | Indirect C: purpose: MSP (re)enrollment<br>FOIPPA s. 26 (a) and (c) [MPA s. 5 & 6],<br>FOIPPA s. 27(1)(b)<br>→set out in ISA                                                            |
| 8. Returned mail notification ICBC notifies HIBC about returned non-photo cards | ICBC discloses to HIBC             | Card Serial Number, Card Returned Date, Card Status, Re-sent Mailing Address, Re-sent Date                                           | D: purpose: MSP (re)enrollment/eligibility: confirm for HIBC who has received a BCSC<br>FOIPPA s. 33.2(a)<br>FOIPPA s. 33.1(1)(d)/ MVA s. 25.02(1)(b) /MPA s. 5 & 6<br>→set out in ISA  |
|                                                                                 | Indirect Collection HIBC from ICBC |                                                                                                                                      | Indirect C: purpose: MSP (re)enrollment<br>FOIPPA s. 26 (a) and (c) [MPA s. 5 & 6],<br>FOIPPA s. 27(1)(b)<br>→set out in ISA                                                            |

**2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

**Information Flows – ICBC and MOH**

To enable BCSC issuance and management and use of the BCSC as a replacement for the CareCard, a specific set of information flows have been identified for exchange between ICBC and MoH/HIBC<sup>8</sup>. Government Agents will be following current practice where possible for collecting personal information either for HIBC and/or for ICBC. The exchange of information between ICBC and MoH/HIBC will be for the following purposes:

1. BCDL/BCID Renewal Notification – to enable notification to existing beneficiaries regarding re-enrolment options when a Driver Licence is expiring. ICBC will provide MOH/HIBC each week with an electronic file containing demographic information of those customers with expiring BCDL and BCID cards that it has sent Notice to Renew (NTR) letters. The HIBC system will attempt to reconcile each ICBC renewal with a MSP beneficiary on first name, middle name, last name, birth date and gender. If there is agreement, HIBC determines if the MSP beneficiary qualifies to receive a photo card. If the MSP beneficiary passes all the requirements, the beneficiary will be sent a notification letter advising a visit to the ICBC counter if they wish to re-enroll in MSP and receive a photo card. ~~If there is no agreement, HIBC will retain the identifiers.~~ Note: the Ministry of Health's Planning and Evaluation PIA will be testing this process and changes may arise from that review.
2. Card Qualification Check (CQC) Query – to enable re-enrolment of an existing MSP beneficiary at a ICBC Driver Licensing Office (front counter site) including confirmation of benefits eligibility and the types of cards available to the applicant (or if none are available). Note: the Ministry of Health's Planning and Evaluation PIA will be testing this process and changes may arise from that review. Please see Appendix A for the CQC steps.
3. Identity Proofing Event Notification – communicates the details of an identity proofing event from ICBC to MoH to confirm successful completion or to notify MoH where an identity or CQC hold has been initiated. An ICBC web Service will send the details of the Identity Proofing Event and other status information to HIBC at the end of the counter visit and of the identity proofing and residency attestation process. In a separate but parallel processing stream, ICBC's image capture workstation transmits the client's image to the image server where the facial recognition investigator application conducts analysis and refers those falling outside acceptable limits to the facial recognition investigation team. For more details about facial recognition, please see the ICBC PIA. Please see Appendix B for the identity proofing flow.

~~Note: ICBC discloses the identity document types and numbers to HIBC and LCTZ, but it does not appear that HIBC discloses this information to ICBC or LCTZ for the non-photo cards. There is a reason that LCTZ only collects the identity proofing documents for the combo card and the standalone photo card; both photo cards are considered Level 3 identity assured and that standard requires evidence of a higher level of identity proofing (therefore requiring the identity proofing document type and number for these types of cards.) The non-photo card is identity proofed to a Level 1 standard and therefore the IAS does not require the identity proofing document. ? The level of assurance required by any given program would be decided based on specific program needs. Some programs may only require low assurance (perhaps when~~

<sup>8</sup> Benefits services are managed by Health Insurance BC (HIBC) on behalf of MoH.

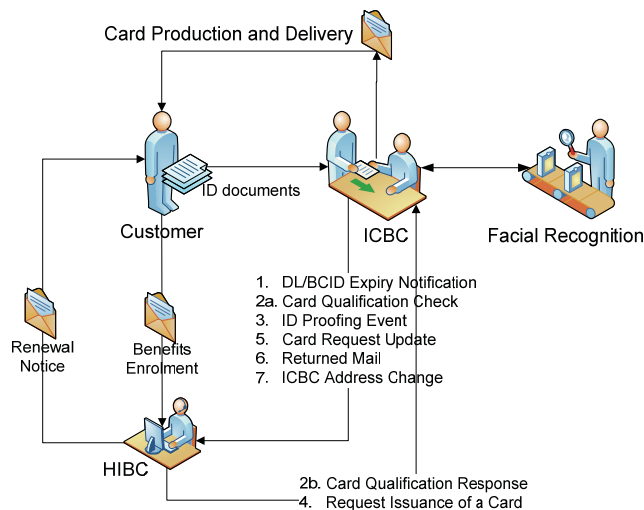
conducting a satisfaction survey) – or may do so in combination with a password. Other programs that require high identity assurance will not allow the non-photo card to be used to access their services.]

4. Request Issuance of a Card – provides the ability for MoH/HIBC to issue card production requests to ICBC, including requests to issue non-photo cards and to remove CQC holds from photo card requests. On a daily basis, HIBC creates an electronic file containing records that ICBC interprets as requests either to release a photo card previously subject to a CQC hold or issue a non-photo card. Please see Appendix C for the flow steps.

**Note:** Why HIBC scans and retains identity documents for the non-photo card? (ICBC does not scan and retain identity documents for the other BC Services Cards; they simply record the type and document number.) The scanning of documents will be the same under the BC Services Card program as it is today under the CareCard program. Currently, Ministry of Health policy requires HIBC to collect scanned copies of two pieces of identity documents as part of the MSP enrollment process (people who are applying for the first time to MSP). The purpose of this is to validate the individual's identity for the purposes of applying for MSP. This practice will not change under the BC Services Card program, irrespective of the type of card the recipient receives/requests. In situations where someone is not a new enrollee and they are presenting at the ICBC counter to replace a lost or stolen card, or to renew enrollment (i.e. they are not a first time applicant), HIBC will not receive scanned copies of the identity documents presented at the ICBC.

5. Card Request Update Notification –ICBC provides notification to HIBC that a BCSC was produced, or a card was not produced because a fraud-related hold was applied or that a photo or non-photo card request has been cancelled. On a daily basis, ICBC sends to HIBC an electronic file containing records about photo and non-photo card production. This information flow has two purposes: to notify HIBC of a produced BCSC; and, to notify HIBC that a Card was not produced due to suspected fraud detected via facial recognition (card not produced).
6. Combo / Photo Card Returned Mail Notification – ICBC communicates to HIBC when a Combo or Photo BCSC has been returned after an attempted mail out, or when a returned card has been re-mailed to a new address, or that a card was destroyed as it remained undeliverable after 1 year. On a daily basis, ICBC sends to HIBC an electronic file that a photo card has been returned undelivered, resent to a new address, or destroyed as undeliverable.
7. ICBC Address Change Notification – enables notification to MoH/HIBC of an ICBC customer address change for a Standalone Photo Card or combo card. ICBC can receive address changes from its customers through various channels – Web, call centre, counter visit, etc. – which trigger production and mailing of an address label containing the updated address.
8. Reporting - Both ICBC and HIBC are responsible for sending aggregated performance data to the Ministry of Health on a periodic basis to support the Ministry's program management responsibility: ~~details will be provided in the MOH Design PIA update.~~

The following diagram depicts the flow of information between ICBC and MoH for the purposes of BCSC qualification and production: Diagram C. ICBC and MoH Information flow



The information exchanged in support of each of the business functions are listed in the tables below. All transactions use one of two methods for exchange between secure servers: encrypted SFTP file transfer or encrypted HTTP (HTTPS) web message transfer. Each method utilizes a minimum 128bit to 256 bit encryption standard, in transit as per Government CIO policy.

#### Data Elements

The BCSC Program will have three classes of (personal) information:

- MSP eligibility information: PHN, Name, Date of Birth, Address, Sex, MSP Residency Reference Number, MSP Residency Attestation, Issue and Expiry Dates.
- Contact information: Address
- Identity information: ID Proofing Reference Number [unique HIBC #], ICBC: ID Proofing Reference Number [unique ICBC #], LCTZ: card serial number, Personal Account Number (pan) number, Health Services Identifier Number

MSP eligibility and other data elements are in different formats on the Cards. Please see Appendix D for the data element formats and placement.

The data elements are provided below and in the authorities table.

Diagram D. ICBC and MoH data exchange by function

**Comment [g5]:** Has this been confirmed 256Bit – for FTPS to MOH SFTP server; and TLS/SSL web?

**Comment [g6]:** Please confirm the additions

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#### **Information Flows – LCTZ (IAS), ICBC and MOH**

Information exchanged with the LCTZ as the Provincial Identity Information Services Provider (PIISP) will be for the purpose of maintaining an identity information management service for public and private bodies. ICBC will be the source for information flows into the LCTZ IAS data repository for the purposes of the BCSC. Privacy impacts of the processes and methods of this exchange will be addressed in ICBC's and LCTZ's PIAs.

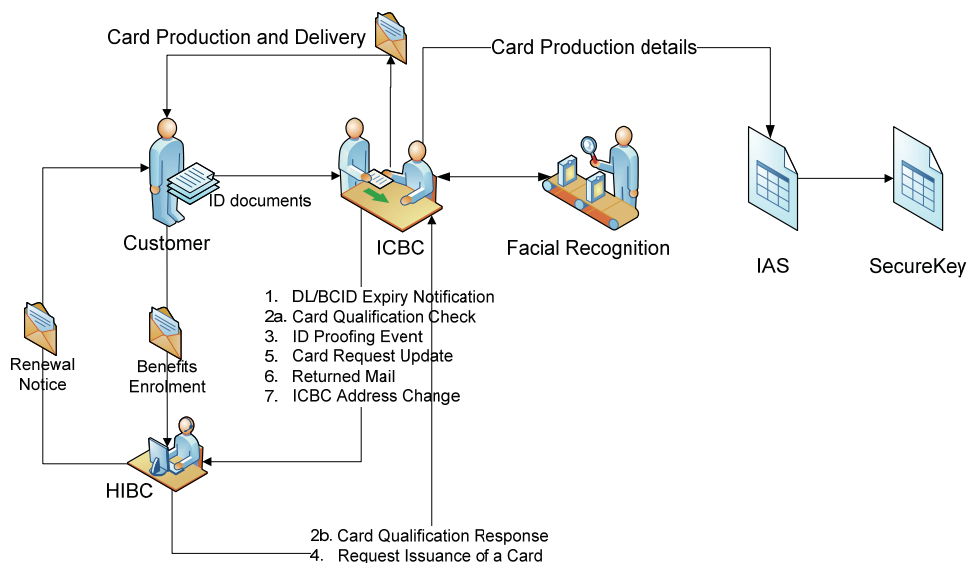
Note: the EMPI-IAS component of this information flow is addressed in the EMPI-IAS PIA.

Although the information received by the IAS will flow from ICBC, there are differing original data sources. Photo and combo card data will originate from ICBC following a counter visit and successful card production. Information for non-photo cards however, will originate from MoH (HIBC).

Non-photo cards will be issued for beneficiaries exempted from enrolment (such as children and seniors  $\geq 75$  years.) As these individuals will not be required to attend an ICBC front counter for card issuance, HIBC will obtain the documentation required for enrolment directly from the beneficiary. Once approved, HIBC will send a request for card issuance through ICBC. ICBC will issue a card and send a card production update to MoH (HIBC) and to IAS as it does for photo and combo cards. There will be a subsequent update from IAS to SecureKey, the chip manufacturer, to update the record of data embedded in the chip of each card. The interaction between IAS and SecureKey is discussed in more detail in the LCTZ PIA.

The flow between ICBC systems and IAS is the same in for the photo and non-photo card processes, but there are fewer non-photo card data elements transmitted by ICBC to IAS than are transmitted for Photo or Combo Cards. Data flow and components transmitted to IAS are listed below. All transmissions to IAS are encrypted file transfers (FTPS) between secure servers. In addition, there is an information flow between the IAS and the MOH/EMPI: this flow is not on the critical path for project launch in November 2012. This step will be addressed in a separate EMPI-IAS PIA.

Diagram E. MOH, ICBC and IAS Information flow



### III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

**NOTE:** the authorities in this section of the PIA are for the MSP Beneficiary Purpose. For details on the IP Purpose, please see Appendix [Error! Reference source not found.](#)

|                                                                    | Yes | No | n/a |
|--------------------------------------------------------------------|-----|----|-----|
| Is personal information being collected?                           |     |    |     |
| HIBC is collecting indirectly from ICBC for the photo cards        | X   |    |     |
| HIBC is collecting directly from the client for the non photo card |     |    |     |

**IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)**

#### 1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

| s. 26 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes | No | n/a |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a)   | Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?                                                                                                                                                                                                                                                                                                                                                                                  | X   | x  |     |
|       | <b>If yes, please specify the name of the Act and relevant section</b><br><br><del>Notification step: HIBC collecting indirectly from ICBC for photo card: MPA s. 5 &amp; 6</del><br><br><del>CQC step: HIBC collecting indirectly from ICBC for photo card: MPA s. 5 &amp; 6</del><br><br><del>ID proofing step: HIBC collecting indirectly from ICBC for photo card: MPA s. 5 &amp; 6</del><br><br><del>Non-photo card: HIBC collecting directly from client: [MPA s. 5(1)(e), 5(1)(f), 7]</del> |     |    |     |
| (b)   | Is the personal information being collected for law enforcement purposes?                                                                                                                                                                                                                                                                                                                                                                                                                          |     | X  |     |



| s. 26 |                                                                                                                                                                                                                                                                     | Yes | No | n/a |
|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (c)   | Is the personal information directly related to, and necessary for, a program or activity of the public body?<br><br>Photo-Notification step: HIBC<br><br>Photo-CQC step: HIBC<br><br>Photo-ID Proofing step: HIBC<br><br>Non-photo Card Request Notification: HIBC | X   |    |     |
| (d)   | Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?                                                                                                                                           |     | X  |     |
|       | <b>If yes, please specify the prescribed purpose.</b>                                                                                                                                                                                                               |     |    |     |
|       | (i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?<br><br><b>and</b>                                                                                                                     |     | X  |     |
|       | (ii) Would a reasonable person consider that collection appropriate in the circumstances?                                                                                                                                                                           |     |    |     |
| (e)   | Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?                                                                                                                              | X   | X  |     |
| (f)   | Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?                                                              |     | X  |     |
| (g)   | Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?<br><br><b>Please identify event:</b>                    |     | X  |     |
| (h)   | Is personal identity information being collected by:                                                                                                                                                                                                                |     |    |     |
|       | A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2,<br><br>or                                                                                    |     | X  |     |

| s. 26 |                                                                                                                                                                                                                                                                                                                                                     | Yes | No | n/a |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|       | A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2. |     | X  |     |

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

## 2) How will the personal information be collected?

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

|                                                                                                               | Yes | No | n/a |
|---------------------------------------------------------------------------------------------------------------|-----|----|-----|
| Will the personal information be collected <u>directly</u> from the individual that the information is about? |     |    |     |
| HIBC collecting indirectly for the photo card                                                                 | X   | X  |     |
| HIBC collecting directly from the client for the non-photo card                                               |     |    |     |

**IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO [3. NOTIFICATION TO COLLECT INFORMATION](#).**

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

| s. 27(1) |                                                                                                                                                                   | Yes | No | n/a |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a)(i)   | Did the individual the information is about authorize another method of collection?                                                                               |     | x  |     |
| (a)(ii)  | Has indirect collection been authorized by the Information and Privacy Commissioner?                                                                              |     | x  |     |
| (a)(iii) | Has indirect collection been authorized by another enactment?                                                                                                     |     | x  |     |
|          | <b>If yes, please specify the name of the Act and relevant section(s)</b>                                                                                         |     |    |     |
| (a.1)(i) | Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual? |     | x  |     |

| s. 27(1)  |                                                                                                                                                                                                                                                                                                                                                                                                                                               | Yes | No | n/a |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a.1)(ii) | Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?                                                                                                                                                                                                                                                                      |     | x  |     |
| (b)       | Is the public body collecting personal information disclosed to it by another public body under an authority within sections 33 to 36 of the FOIPP Act?                                                                                                                                                                                                                                                                                       | x   |    |     |
|           | <b>Specify relevant section(s) or subsections that apply.</b><br>Notification step: HIBC collecting indirectly from ICBC for photo card: 33.2 (d) <del>1(1)(d)</del><br>[MPA s. 5 & 6]<br>CQC step: HIBC collecting indirectly from ICBC for photo card: 33.2 (d) <del>1(1)(d)</del> [MPA s. 5 & 6]<br>ID proofing step residency attestation: HIBC collecting indirectly from ICBC for photo card: 33.2(d) <del>1(1)(d)</del> [MPA s. 5 & 6] |     |    |     |
| (c)(i)    | Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?                                                                                                                                                                                                                                                                    |     | x  |     |
| (c)(ii)   | Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?                                                                                                                                                                                                                                                                                                          |     | x  |     |
| (c)(iii)  | Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?                                                                                                                                                                                                                                                                                                                                 |     | x  |     |
| (c)(iv)   | Is the personal information being collected for the purpose of law enforcement?                                                                                                                                                                                                                                                                                                                                                               |     | x  |     |
| (c)(v)    | Is the personal information being collected to reduce the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?                                                                                                                                                                                                                                                                  |     | x  |     |
| (d)       | Is the personal information being transferred to the public body from another public body in accordance with section 27.1?                                                                                                                                                                                                                                                                                                                    |     | x  |     |
| (e)       | Is the personal information being collected necessary for delivering a common or integrated program or activity?                                                                                                                                                                                                                                                                                                                              |     | x  |     |
| (f)       | Is the personal information about an employee, other than a service provider, and the collection of the information is necessary for the purposes of managing or terminating an employment relationship between a public body and the employee?                                                                                                                                                                                               |     | x  |     |
| (g)       | Is the information personal identity information that is collected by the designated provincial identity information service that is necessary to provide services under section 69.2?                                                                                                                                                                                                                                                        |     | x  |     |

| s. 27(1) |                                                                            | Yes | No | n/a |
|----------|----------------------------------------------------------------------------|-----|----|-----|
|          |                                                                            |     |    |     |
|          |                                                                            |     |    |     |
|          | Additional details as required (e.g., explanation of method of collection) |     |    |     |

***If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.***

### 3) Notification to collect information

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

| 27(2) |                                                                                              | Yes | No | n/a |
|-------|----------------------------------------------------------------------------------------------|-----|----|-----|
|       | Has the individual from whom personal information is being collected, been informed of:      |     |    |     |
|       | (a) the purpose for collection?                                                              | X   |    |     |
|       | (b) the legal authority for collection?                                                      | X   |    |     |
|       | (c) the contact information of the person who can answer questions regarding the collection? | X   |    |     |

| 27(2) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Yes | No | n/a |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|       | <p><b>Additional details as required (e.g., method of notification)</b></p> <p>The notification statement for letters and other correspondence methods relating to the MSP beneficiary purpose and BCSC such as brochures will be as follows:</p> <p style="padding-left: 40px;">All personal information is collected under the authority of the Medicare Protection Act and the Freedom of Information and Protection of Privacy Act. The information is used to determine residency in B.C. and determine eligibility for provincial health care benefits as well as for the issuance of the BC Services Card. This information is protected from unauthorized use and disclosure in accordance with the Freedom of Information and Protection of Privacy Act and may be disclosed only as provided by that Act. If you have any questions about the collection, use and disclosure of this information, contact HIBC.</p> <p>Currently, HIBC is collecting directly from the client for the non photo card using the existing MSP forms sent in by mail</p> <p>The existing forms have the following language:</p> <p style="padding-left: 40px;">Personal information on this form is collected under the authority of the Medicare Protection Act. The information will be used to determine residency in BC and determine eligibility for provincial health care benefits. If you have any questions about the collection of this information, contact Health Insurance BC at the address or telephone numbers on page 1. Personal information is protected from unauthorised use and disclosure in accordance with the Freedom of Information and Protection of Privacy Act and may be disclose only as provided by this Act.</p> <p style="padding-left: 40px;">If you have questions about your MSP eligibility, enrolment, health benefits and PharmaCare, visit <a href="http://hibc.gov.bc.ca">hibc.gov.bc.ca</a> or call Health Insurance BC 604-683-7151 (lower mainland) or toll free at 1 800-663-7100.</p> <p style="padding-left: 40px;">For general information about the BC Services Card Program, visit <a href="http://bcservicescard.ca">bcservicescard.ca</a> or call Service BC Contact Centre 604-660-2421 (lower mainland) or toll free at 1 800-663-7867.</p> <p>This existing notification on the forms and other communication with the public will be changed to reflect the MSP purpose and the BCSC.</p> <p style="padding-left: 40px;">The complete set of notification materials will be appended to this document when finalized.</p> |     |    |     |

**Comment [17]:** OIPC letter September 6 2012 needs contact information. I have added info from the notification letter draft that has been approved by OIPC.

**Notification is not required if the answer is “yes” to any of the following:**

| 27(3)                                 |                                                                                                                                                                                                                                                                        | Yes | No | n/a |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a)                                   | Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?                                                                                                                                          |     | X  |     |
| (b)                                   | Has the Minister responsible for the FOIPP Act excused your public body from complying because it would                                                                                                                                                                |     |    |     |
|                                       | (a) result in the collection of inaccurate information?                                                                                                                                                                                                                |     | X  |     |
|                                       | or<br>(b) defeat the purpose or prejudice the use for which the personal information is collected?                                                                                                                                                                     |     |    |     |
| (c)                                   | The information<br>(a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, <b>and</b><br>(b) is not collected directly from the individual the information is about                                        |     | X  |     |
| (d)                                   | Is the information collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appears and that is open to the public.<br><br><b>Please identify event:</b>                                    |     | X  |     |
| 27 (4)                                | Is it reasonable to expect that notifying an employee of collection under subsection 27 (1) (f) would compromise<br><br>(a) the availability or accuracy of the information, or<br><br>(b) an investigation or a proceeding related to the employment of the employee? |     | X  |     |
| <b>Additional details as required</b> |                                                                                                                                                                                                                                                                        |     |    |     |

***If you have not provided the required notification as outlined above, please contact Knowledge and Information Services.***

#### IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

|                                                                                        | Yes | No | n/a |
|----------------------------------------------------------------------------------------|-----|----|-----|
| Is personal information being used?<br>HIBC is using for the photo and non photo cards | X   |    |     |

**IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO [V. DISCLOSURE OF PERSONAL INFORMATION](#)**

***Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.***

The public body **must** check one or more of the authorities listed below:

| s.32 |                                                                                                                                                                                                                                                          | Yes | No | n/a |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a)  | Has the individual the personal information is about consented to the use?<br>(Note: Supporting documentation must be on file.)                                                                                                                          | X   | X  |     |
| (b)  | Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?                                                                                                              | X   |    |     |
|      | <b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b>                                                                      |     |    |     |
| (c)  | If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?                                                                    | X   |    |     |
|      | <b>Specify subsection(s) being applied</b><br>Notification step: HIBC use: send out notification letters to beneficiaries to renew MSP<br>CQC step: HIBC use determine card eligibility /type<br>Note: this section does not apply to the non-photo card |     |    |     |

***If you have not checked one of the above, you do not have the authority to use the information. If you have any questions or require clarification please contact Knowledge and Information Services.***

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

|                                          | Yes | No | n/a |
|------------------------------------------|-----|----|-----|
| Is personal information being disclosed? | X   |    |     |

**IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO**

**VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION.**

*A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.*

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please choose the main authorization(s) for disclosure below. All authorities that may apply do not need to be checked, only the main authorizations for the initiative.

| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                          | Yes | No | n/a |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (1)(a)   | In accordance with Part 2 (pursuant to an FOI request)                                                                                                                                                                       |     | X  |     |
| (1)(a.1) | If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):<br><br>22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if |     |    |     |
|          | (e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,                                                  |     | X  |     |
|          | (f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,                                                                                                           |     | X  |     |
|          | (h) the information is about expenses incurred by the third party while travelling at the expense of a public body,                                                                                                          |     | X  |     |

**Comment [I8]:** 1.OIPC Q LCTZ email Aug 3: Should s. 33.1(1)(a), disclosure inside or outside Canada in response to FOI request, be marked "yes" instead? We agree with LCTZ's interpretation that this is a "no" as this is not one of the "main authorizations" for disclosure.



| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                                                                                | Yes | No | n/a |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|          | (i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or                                          |     | X  |     |
|          | (j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).       |     | X  |     |
| (1)(b)   | If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable<br>(Note: Supporting documentation must be on file)                                                   |     | X  |     |
| (1)(c)   | In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure                                                                                             | X   | x  |     |
|          | <b>Specify name of enactment and relevant section(s)</b><br><b>For MSP Beneficiary Purposes</b><br>Photo: HIBC disclose to ICBC Card Qualification Check: MPA s. 5 & 6<br>Photo and Non-photo HIBC disclose to ICBC card request issuance step: MPA s. 5 & 6                       |     |    |     |
| (1)(c.1) | If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public                                    |     | X  |     |
|          | <b>Specify name of enactment and relevant section(s)</b>                                                                                                                                                                                                                           |     |    |     |
| (1)(d)   | In accordance with a provision of a treaty, arrangement or written agreement that<br>(i) authorizes or requires its disclosure, and<br>(ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada | X   | x  |     |
|          | <b>Specify name of enactment and relevant section(s)</b><br><b>For MSP Beneficiary Purposes</b><br>Photo: HIBC disclose to ICBC Card Qualification Check: MPA s. 5 & 6<br>Photo and Non-photo HIBC disclose to ICBC Card Request Issuance step: MPA s. 5 & 6                       |     |    |     |

| s. 33.1 Disclosure inside OR outside Canada                                                                                                |                                                                                                                                                                                                                                                                                                         | Yes | No | n/a |
|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (1)(e)                                                                                                                                     | To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if<br><br>(i) the information is necessary for the performance of the duties of the minister, officer or employee,                                                   |     |    |     |
|                                                                                                                                            | and<br><br>(ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada                                                                                                                                           |     | X  |     |
| If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i>   |                                                                                                                                                                                                                                                                                                         |     |    |     |
| (1)(e.1)                                                                                                                                   | To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if<br><br>(i) the information is necessary for the performance of the duties of the individual in relation to the public body,                                                   |     |    |     |
|                                                                                                                                            | and<br><br>(ii) in relation to disclosure outside Canada,<br><br>(A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and<br><br>(B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada |     | X  |     |
| If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i> |                                                                                                                                                                                                                                                                                                         |     |    |     |
| (1)(f)                                                                                                                                     | To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister                                                                                                             |     | X  |     |
| (1)(g)                                                                                                                                     | To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body                                                                          |     | X  |     |
| (1)(h)                                                                                                                                     | To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act                                                                                                                                                                |     | X  |     |
| (1)(i)                                                                                                                                     | If                                                                                                                                                                                                                                                                                                      |     |    |     |
|                                                                                                                                            | (i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by                                                                                                                                                                            |     | X  |     |

|                  |                                                                                                                                                                                                                      |  |   |  |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---|--|
|                  | a. an individual, or                                                                                                                                                                                                 |  |   |  |
|                  | b. corporation of which the individual the information is about is or was a director or officer,                                                                                                                     |  |   |  |
|                  | <b>and</b>                                                                                                                                                                                                           |  |   |  |
|                  | (ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that                                                                                                                       |  |   |  |
|                  | a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or                                                                                                             |  |   |  |
|                  | b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction                                                                                                  |  |   |  |
| <b>1(i.1)</b>    | For the purposes of                                                                                                                                                                                                  |  |   |  |
|                  | (i) a payment to be made to or by the government of British Columbia or a public body,                                                                                                                               |  | X |  |
|                  | (ii) authorizing, administering, processing, verifying or cancelling such a payment, or                                                                                                                              |  | X |  |
|                  | (iii) resolving an issue regarding such a payment                                                                                                                                                                    |  | X |  |
| <b>(1)(j)</b>    | (i) Repealed.                                                                                                                                                                                                        |  |   |  |
| <b>(1)(k)</b>    | For the purposes of                                                                                                                                                                                                  |  |   |  |
|                  | (i) licensing or registration of motor vehicles or drivers, or                                                                                                                                                       |  | X |  |
|                  | (ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences                                                                                                                         |  | X |  |
| <b>(1)(l)</b>    | For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations                                 |  | X |  |
| <b>(1)(m)</b>    | If                                                                                                                                                                                                                   |  |   |  |
|                  | (i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and                                                                                            |  |   |  |
|                  | (ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety |  | X |  |
| <b>(1) (m.1)</b> | For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur                                                                    |  | X |  |

|        |                                                                                                                                                                                                                                                                                                                                  |  |   |  |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---|--|
| (1)(n) | So that the next of kin or a friend of an injured, ill or deceased individual may be contacted                                                                                                                                                                                                                                   |  | X |  |
| (1)(o) | In accordance with section 36 (disclosure for archival or historical purposes)                                                                                                                                                                                                                                                   |  | X |  |
| (1)(p) | The disclosure<br>(i) is necessary for                                                                                                                                                                                                                                                                                           |  |   |  |
|        | (A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or                                          |  |   |  |
|        | (B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body                                                                                                                  |  | X |  |
|        | <b>and</b><br>(ii) in the case of disclosure outside Canada<br>(A) is limited to temporary access and storage for the minimum time necessary for that purpose, and<br>(B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred                    |  |   |  |
|        | <b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>                                                                                                                                                                                             |  |   |  |
| (1)(q) | If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public.<br><b>Please identify event:</b>                                                                                            |  | X |  |
| (1)(r) | If the information<br>Was disclosed on a social media site by the individual the information is about,                                                                                                                                                                                                                           |  |   |  |
|        | Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body,<br><b>and</b> |  | X |  |

|                                       |                                                                                                                                                                       |  |   |  |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---|--|
|                                       | Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).                                                                            |  |   |  |
| <b>Additional details as required</b> |                                                                                                                                                                       |  |   |  |
| (1)(s)                                | <u>In accordance with section 35 (disclosure for research or statistical purposes).</u>                                                                               |  | X |  |
| (1)(t)                                | <u>To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information</u> |  | X |  |

|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |   |  |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---|--|
| (2)                                   | In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33                                                                                                                                                                                                                                    |  |   |  |
| (2)(a)                                | To another law enforcement agency in Canada                                                                                                                                                                                                                                                                                                                                                                                           |  | X |  |
| (2)(b)                                | To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.                                                                                                                                                                                                                                                                                 |  | X |  |
| (3)                                   | The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.                                                                                                                                                                                 |  | X |  |
| (4)                                   | In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,<br><br>(a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and<br><br>(b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim. |  | X |  |
| (5) and (6)                           | For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)                                                                                                                                                                                                                                                                                                     |  | X |  |
| (7)                                   | To respond to citizens' enquiries as permitted under section 33.1(7)                                                                                                                                                                                                                                                                                                                                                                  |  | X |  |
| <b>Additional details as required</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |   |  |

**Comment [19]:** 1.OIPC Q LCTZ email Aug 3: Should s.33.1(7) read "yes" instead?  
We have interpreted this to be a "no" as this is not a "main" authority for disclosure.

| s. 33.2 | Disclosure inside Canada only                                                                                                                                                                                                                                                                                                                                                | Yes | No | n/a |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a)     | For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)                                                                                                                                                                                                                                                             | X   |    |     |
|         | <b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b><br><br>Photo-CQC step: HIBC disclose to ICBC information about eligibility and card type<br><br>Non-photo-Card request issuance flow: HIBC disclose information to create non photo card |     |    |     |
| (b)     | Repealed.                                                                                                                                                                                                                                                                                                                                                                    |     |    |     |
| (c)     | To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister                                                                                                                                                                                                        | X   |    |     |
| (d)     | To an officer or employee of<br>(i) a public body, or<br>(ii) an agency<br><br>or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed    | X   |    |     |
| (e)     | To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister                                                                                                                                                                                                 |     | X  |     |
| (f)     | To the auditor general or any other prescribed person or body for audit purposes                                                                                                                                                                                                                                                                                             |     | X  |     |
| (g)     | To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem                                                                                                                                                                                                                                   |     | X  |     |
| (h)     | To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry                                                                                                                                                                                                                            |     | X  |     |
| (i)     | To a public body or a law enforcement agency in Canada to assist in a specific investigation                                                                                                                                                                                                                                                                                 |     |    |     |
|         | (i) undertaken with a view to a law enforcement proceeding, or                                                                                                                                                                                                                                                                                                               |     | X  |     |
|         | (ii) from which a law enforcement proceeding is likely to result                                                                                                                                                                                                                                                                                                             |     | X  |     |
| (j)     | To the archives of the government of British Columbia or the archives of a public body, for archival purposes                                                                                                                                                                                                                                                                |     | X  |     |

**Comment [I10]:** 2.OIPC Q LCTZ email Aug 3: Should s. 33.2(a) read "no" instead?  
 We have interpreted "consistent purpose" to be one of the "main authorizations" for disclosure.

| s. 33.2 | Disclosure inside Canada only                                                                                                                                                  | Yes | No | n/a |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (k)     | Repealed.                                                                                                                                                                      |     |    |     |
| (l)     | To an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body |     | X  |     |
|         | Additional details as required                                                                                                                                                 |     |    |     |

| s. 33.3 | Disclosure to Public Without Request                                      | Yes | No | n/a |
|---------|---------------------------------------------------------------------------|-----|----|-----|
| (1)     | Do the records fall within a category established under section 71 (1)?   |     | X  |     |
|         | Additional details as required                                            |     |    |     |
| (2)     | Do the records fall within a category established under section 71.1 (1)? |     | X  |     |
|         | Additional details as required                                            |     |    |     |

## 2) Systematic or Repetitious Disclosure/Exchanges?

|      |                                                                                                                                                                                                | Yes | No | n/a |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Do the disclosures of personal information under section 33.2 occur on a regular basis?                                                                                                        | X   |    |     |
| ii.  | Has an Information Sharing Agreement been completed for these disclosures/exchanges?<br><br>ISAs and other agreements are in drafting stage: they will be completed prior to November 30 2012. | X   |    |     |
| iii. | Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ?                                                                  |     | X  |     |

Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.

## 3) Research or Statistical Purposes (Section 35)

|                                                                                                          | Yes | No | n/a |
|----------------------------------------------------------------------------------------------------------|-----|----|-----|
| Has a researcher requested access to personal information in an identifiable form for research purposes? |     | X  |     |

If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact Knowledge and Information Services for assistance.

**Please note:** Research using personal information may only be conducted if it meets all of the terms of section 35.

#### 4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

|     |                                                                                                      | Yes | No | n/a |
|-----|------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a) | The disclosure would not be an unreasonable invasion of personal privacy under section 22            |     |    | X   |
| (b) | The disclosure is for historical research and is in accordance with section 35 (research agreements) |     |    | X   |
| (c) | The information is about someone who has been dead for 20 or more years                              |     |    | X   |
| (d) | The information is in a record that has been in existence for 100 or more years                      |     |    | X   |

***If you have not answered “yes” to any of the above authorizations for disclosure you do not have the authority to disclose personal information. If you have any questions or require clarification, please contact Knowledge and Information Services.***

## VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION (Section 28 and section 29 of the FOIPP Act)



If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Yes                                                                             | No | n/a |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|----|-----|
| 1. | <p>Are there procedures in place to enable an individual to request/review a copy of their own personal information?</p> <p>The Ministry of Health and HIBC will follow current practices for Freedom of Information Access for MSP beneficiaries requesting their own information. In some cases, it will be anticipated that there will need to be a co-ordinated approach. <del>Details of this coordinated process will be provided in the Design PIA update.</del></p> <p>There are HIBC procedures in place to enable an individual to request/review a copy of their own personal information. There are procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file.</p> | X                                                                               |    |     |
| 2. | <p>Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?</p> <p>The Ministry of Health and HIBC will follow current practices for ensuring accuracy and correct personal information for MSP beneficiaries. In some cases, it will be anticipated that there will need to be a co-ordinated approach. <del>Details of this coordinated process will be provided in the Design PIA update.</del></p> <p>There are HIBC procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file.</p>                                                                                      | X                                                                               |    |     |
| 3. | <p>If personal information is corrected, are there procedures in place to notify other holders of this information?</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | X                                                                               |    |     |
|    | <b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                 |    |     |
|    | Policy/procedure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Work Instruction 8.4.2 (Collection, Use and Correction of Personal Information" |    |     |
|    | Contact person:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Bev Hooper, Chief Privacy Officer, MAXIMUS BC                                   |    |     |
|    | Phone number:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 250-405-3726                                                                    |    |     |

|  |                                |
|--|--------------------------------|
|  | Additional details as required |
|--|--------------------------------|

*If any of the questions above have been answered "no", please contact Knowledge and Information Services for further clarification.*

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION** (Sections 30 and 30.1 of the FOIPP Act)

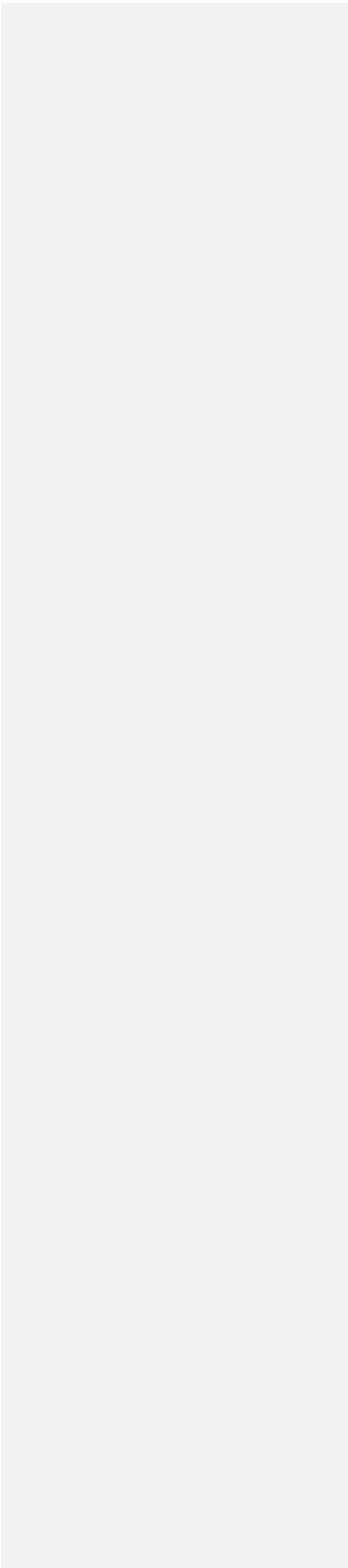
**Note:** For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the [Signatures](#) section.

For PIAs that do not involve systems initiatives, this section should be completed by the program area completing the PIA. In this case, the signature of the systems representative is not required.

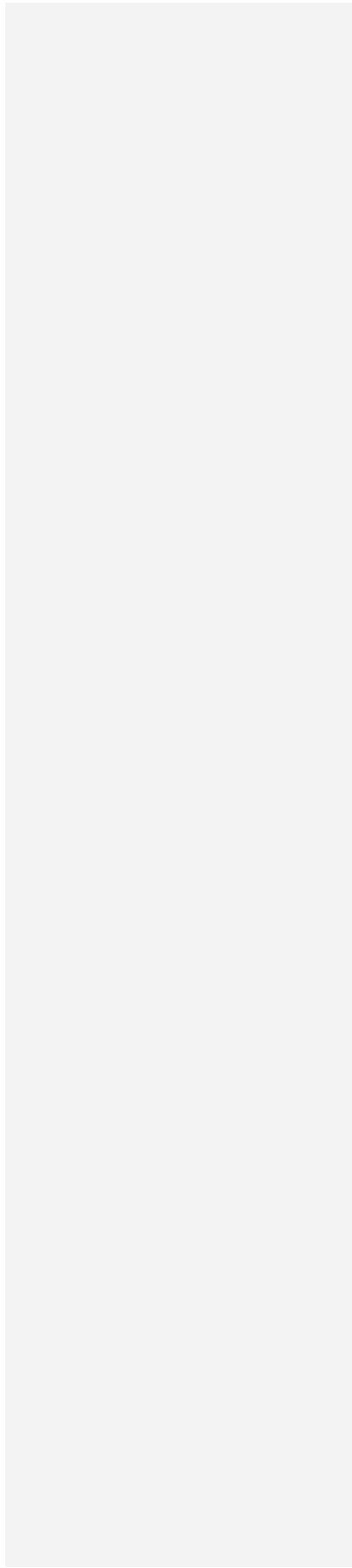
Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

**Note:** MAXIMUS has provided details of their current processes: ~~some of these may need updating in the MOH Design PIA update to reflect modifications to support the BCSC.~~ The security processes will need to be revised to reflect other forms of information transfer such as by email should they be adopted.

|  |  |     |    |     |
|--|--|-----|----|-----|
|  |  | Yes | No | n/a |
|--|--|-----|----|-----|



|    |                                                                                                                                                                                                                                                                                              |  |  |  |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| 1. | <p>Is there reasonable technical security in place to protect against unauthorized access or disclosure?</p> <p>Security controls to be described in the BC Services Card Project – Ministry of Health Detailed Design Phase Security, Threat and Risk Assessment (STRA) Summary Report.</p> |  |  |  |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|



|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |   |  |  |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--|--|
| 2. | <p>Is there reasonable physical security in place to protect against unauthorized access or disclosure?</p> <p>Security controls to be described in the BC Services Card Project – Ministry of Health Detailed Design Phase Security, Threat and Risk Assessment (STRA) Summary Report.</p> <p>R&amp;PB (at SSBC datacentres) and Maximus/HIBC services are in secured facilities that have redundant services (network, software, middleware, proxy servers)</p> <p>To-be-confirmed processes for protecting data on removable media (including interim hardcopy), data handling procedures and data destruction practices.</p> <p>MAXIMUS applies specialized controls to web enabled applications such as secure transfers (HTTPS), limiting access to approved IP address ranges only, access control lists, reverse proxy servers, client certificates and other controls based on the security related attributes and constraints defined in the Solution Architecture deliverable which is approved by the Ministry of Health.</p> <p>MAXIMUS employs various controls such as use of proximity card readers for access to its offices, allows access to critical IT facilities to authorized personnel only, and utilizes space at the Ministry of Health approved Data Centres</p> <p>MAXIMUS employs controls such as use of proximity card readers for access to its offices and restricts access to critical computer equipment and documentation to authorized personnel only. MAXIMUS secures laptops using physical cable locks</p> <p>MAXIMUS employs a range of controls for its workstations to function as required, such as standard desktop imaging, up-to-date antivirus software, installation of authorized applications only, streamlined incident management, and timely software updates and hardware upgrades.</p> <p>MAXIMUS utilizes anti-virus software on its workstations that is updated routinely to provide protection against malicious software</p> <p>MAXIMUS employs password and user authentication procedures and standards for network access and its users are required not to download or store personal and confidential information locally on their workstations/laptops</p> <p>MAXIMUS users can read from USB memory sticks but cannot write to them, with the exception of Tech Support. MAXIMUS protects stored on portable storage devices through encryption when the stored information warrants protection information on portable storage devices through encryption when the stored information warrants protection</p> <p>To-be-confirmed further details from the BC Services Card Design phase.</p> | X |  |  |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--|--|

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                              |  |  |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--|--|
| 3. | <p>Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?</p> <p>MAXIMUS has a documented security policy that was reviewed and approved by the Ministry of Health.</p> <p>MAXIMUS conducts mandatory annual Privacy and Confidentiality Certification for all employees and contractors via computer based training (CBT), testing and tracking of results.</p> <p>MAXIMUS follows the Ministry of Health guidelines for classification of Province Data / information assets (Highly Sensitive, Confidential, etc).</p> <p>MAXIMUS has appropriate measures in place to safeguard sensitive information on the data storage media against corruption, loss, or disclosure through enforcement of its security framework that is underpinned by appropriate policies, procedures, work instructions, training, monitoring, and incident management.</p> <p>MAXIMUS applies specialized controls to web enabled applications such as secure transfers (HTTPS), limiting access to approved IP address ranges only, access control lists, reverse proxy servers, client certificates and other controls based on the security related attributes and constraints defined in the Solution Architecture deliverable which is approved by the Ministry of Health.</p> <p>MAXIMUS encrypts point to point message traffic between its systems and the Shared Services BC 3<sup>rd</sup> Party Gateway (3PG) utilizing the Transport Layer Security (TLS) protocol. During 2008-2009 per mandate from the Ministry of Health, MAXIMUS identified all external interfaces that transmitted personal information and successfully incorporated approved data encryption protocols and methods to securely receive/transfer information.</p> <p>MAXIMUS uses cryptographic solutions through secure transmission methods and protocols (digital certificates, digital signatures, secure shell, secure sockets layer, IP Sec, etc) to preserve the integrity of critical information.</p> | X                                            |  |  |
|    | <b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                              |  |  |
|    | Policy/procedure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | To be documented (incomplete as of this pia) |  |  |
|    | Contact person:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | To be documented (incomplete as of this pia) |  |  |
|    | Phone number:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | To be documented (incomplete as of this pia) |  |  |

**Comment [I11]:** Will need this filled out

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p><b>Additional details as required</b></p> <ul style="list-style-type: none"> <li>• HIBC personnel that require access to specific transactions must sign confidentiality agreements and regular audits are conducted to ensure that the agreements are enforced.</li> <li>• MAXIMUS conducts mandatory initial (upon hiring) and annual Privacy and Confidentiality Certification for all employees and contractors via computer based training (CBT), testing and tracking of results</li> <li>• MAXIMUS reviews the security roles and terms of employment with new employees and contractors during orientation. The MAXIMUS employment and services agreements of new hires specify responsibilities in relation to privacy, security, and confidentiality of personal and business information.</li> <li>• MAXIMUS conducts reference and criminal record checks as part of the employment screening for all prospective employees and contractors prior to making employment or contract offers</li> </ul> <p>MAXIMUS:</p> <ul style="list-style-type: none"> <li>▪ utilizes role based access controls and follows password and user authentication procedures and standards for network and information systems access ,</li> <li>▪ processes personal information in compliance with the documented corporate policy for data protection and privacy,</li> <li>▪ enforces clear desk and clear screen policy for staff dealing with Personal Information, and</li> <li>▪ conducts mandatory initial and annual Privacy and Confidentiality Certification for all employees and contractors via computer based training, testing and tracking of results.</li> </ul> |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |   |  |  |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--|--|
| 4. | <p>Have user access profiles been assigned on a need-to-know basis?</p> <p>Security controls to be described in the BC Services Card Project – Ministry of Health Detailed Design Phase Security, Threat and Risk Assessment (STRA) Summary Report.</p> <p>The responsibilities of the Application Owners are clearly defined in the MAXIMUS roles and responsibilities matrix and are reviewed and accepted by the individuals prior to embarking on the role</p> <p>MAXIMUS uses a consistent set of methods for user access requisition and management that requires requests to add, remove, or change access privileges be submitted by MAXIMUS management for internal MAXIMUS users and by the Ministry of Health for external users</p> <p>MAXIMUS' internal and external users are required to follow MAXIMUS' policy on password setup and protection as approved by Ministry of Health</p> <p>MAXIMUS access control arrangements restrict access to only approved system capabilities through roles based on "need to know" or "need to access" guidelines</p> <p>MAXIMUS authenticates users before access is granted to target systems. MAXIMUS also supports trusted connections to systems where users are (pre)authenticated by Ministry of Health systems</p> <p>MAXIMUS has strong authentication mechanism for high risk users such as System Administrators, Network Administrator, Database Administrator, Security officer, etc before access is granted</p> <p>MAXIMUS users are subjected to a rigorous intranet sign-on process before being provided with access to sign-on screen of target computer systems</p> | X |  |  |
| 5. | <p>Do controls and procedures exist for the authority to add, change or delete personal information?</p> <p>Security controls to be described in the BC Services Card Project – Ministry of Health Detailed Design Phase Security, Threat and Risk Assessment (STRA) Summary Report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | X |  |  |



|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |   |  |  |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--|--|
| 6. | <p>Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?</p> <p>MAXIMUS using current processes:</p> <ul style="list-style-type: none"> <li>▪ deployed Intrusion Detection (IDS) and Intrusion Prevention systems (IPS),</li> <li>▪ enabled web monitoring and filtering product to restrict accessing web sites that are deemed as not recommended,</li> <li>▪ a manual audit program that is executed from its Privacy Office,</li> <li>▪ assigned the IT Infrastructure and Tech Support teams the responsibility to monitor systems use, and</li> <li>▪ incorporated processes for capturing and reviewing the system audit logs</li> </ul> | X |  |  |
|    | <p><b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b></p> <p>Security controls to be described in the BC Services Card Project – Ministry of Health Detailed Design Phase Security, Threat and Risk Assessment (STRA) Summary Report.</p> <p>MAXIMUS undergoes an annual 5970 OAG audit / review under the direction of the Ministry of Health</p> <p>The security annual audits / reviews at MAXIMUS are carried out by a Third Party hired by the Ministry of Health</p>                                                                                                                                                                                                     |   |  |  |
| 7. | Does the audit identify inappropriate accesses to the system?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | X |  |  |

**Additional details**

Security controls to be described in the BC Services Card Project – Ministry of Health Detailed Design Phase Security, Threat and Risk Assessment (STRA) Summary Report.

MAXIMUS applies additional controls to sensitive physical material by following directions provided by the Ministry of Health with regards to physical security, media and data handling, media backup, media disposal, and media in transit.

MAXIMUS logs information security incidents utilizing the system incident management system (ITG) / process and manages the security incidents through the Security Officer. Security incidents that have privacy implications are escalated to the Privacy Officer and managed as privacy incidents. Material security incidents are escalated to the Ministry of Health

MAXIMUS maintains the security-related events logs in its system incident management system (ITG) and other secured system locations that are only accessible to the Security Officer and other authorized users

MAXIMUS has an emergency response process for dealing with serious attacks as mandated by the Ministry of Health and MAXIMUS' Senior Management

***If any of the questions above have been answered "no", please contact your Ministry's Security Officer. If you have any questions or require clarification please contact Knowledge and Information Services.***

**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION cont'd**

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

|  |                                                            | Yes | No | n/a |
|--|------------------------------------------------------------|-----|----|-----|
|  | Will the information be stored or accessed only in Canada? | X   |    |     |

**Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

|  |  | Yes | No | n/a |
|--|--|-----|----|-----|
|  |  |     |    |     |

|     |                                                                                                                                                                                                             |  |   |  |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---|--|
| (a) | Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?                                    |  | X |  |
|     | Please explain                                                                                                                                                                                              |  |   |  |
| (b) | Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ? |  | X |  |
|     | Please explain                                                                                                                                                                                              |  |   |  |
| (c) | Will the personal information be disclosed under section 33.1(1)(i.1)?                                                                                                                                      |  | X |  |
|     | Please explain                                                                                                                                                                                              |  |   |  |

*If you have not answered “yes” to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact Knowledge and Information Services.*

#### VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

**If a public body uses an individual’s personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.**

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Yes | No | n/a |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | <p>Do you have an approved records retention and disposition schedule?</p> <p>MAXIMUS complies with legal and regulatory requirements for information privacy per Freedom of Information and Protection of Privacy Act (FOIPPA) and as mandated in the Master Services Agreement with the Province by following:</p> <ul style="list-style-type: none"> <li>• inherited records management practices per established Operational Records Classification System (ORCS) policy and guidelines,</li> <li>• MAXIMUS BC Health Inc. conforms to the Ministry of Health's Data Retention Schedule [400-20/BCSC/BR]</li> </ul> | X   |    |     |
| 2. | <p>Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?</p> <p>MAXIMUS BC Health Inc. only destroys information confidentially as prescribed by the Ministry of Health's Data Retention Schedule [400-20/BCSC/BR].</p>                                                                                                                                                                                                                                                                                  | X   |    |     |

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your Records Officer.***

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**

**Comments:**

**X      SIGNATURES**

**PUBLIC BODY APPROVAL:**

|                                                                                                                       |               |
|-----------------------------------------------------------------------------------------------------------------------|---------------|
| _____<br>Catherine Gale<br>Director, BC Services Card Secretariat<br>Business Management Office<br>Ministry of Health | _____<br>Date |
|-----------------------------------------------------------------------------------------------------------------------|---------------|

|                                                                       |               |
|-----------------------------------------------------------------------|---------------|
| _____<br>Bev Hooper<br>Chief Privacy Officer<br>MAXIMUS BC Health Inc | _____<br>Date |
|-----------------------------------------------------------------------|---------------|

|                                                                                                                                                                                            |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| _____<br>Gwen Lock<br>Ministry Information Security Officer<br>Corporate Information Security and Audit<br>Health Information Privacy, Security & Legislation Office<br>Ministry of Health | _____<br>Date |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|

|                                                                                                              |               |
|--------------------------------------------------------------------------------------------------------------|---------------|
| _____<br>Nikki Sieben<br>Executive Director, Strategic Projects<br>Health Sector IM/IT<br>Ministry of Health | _____<br>Date |
|--------------------------------------------------------------------------------------------------------------|---------------|

|                                                                                                                                                                                              |               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| _____<br>Charmaine Lowe<br>Executive Director<br>Knowledge and Information Services<br>Office of the Chief Information Officer<br>Ministry of Labour, Citizens Services, and Open Government | _____<br>Date |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|

**GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA and/or ISA summary)**

## APPENDIX

### A. Card Qualification Check Steps

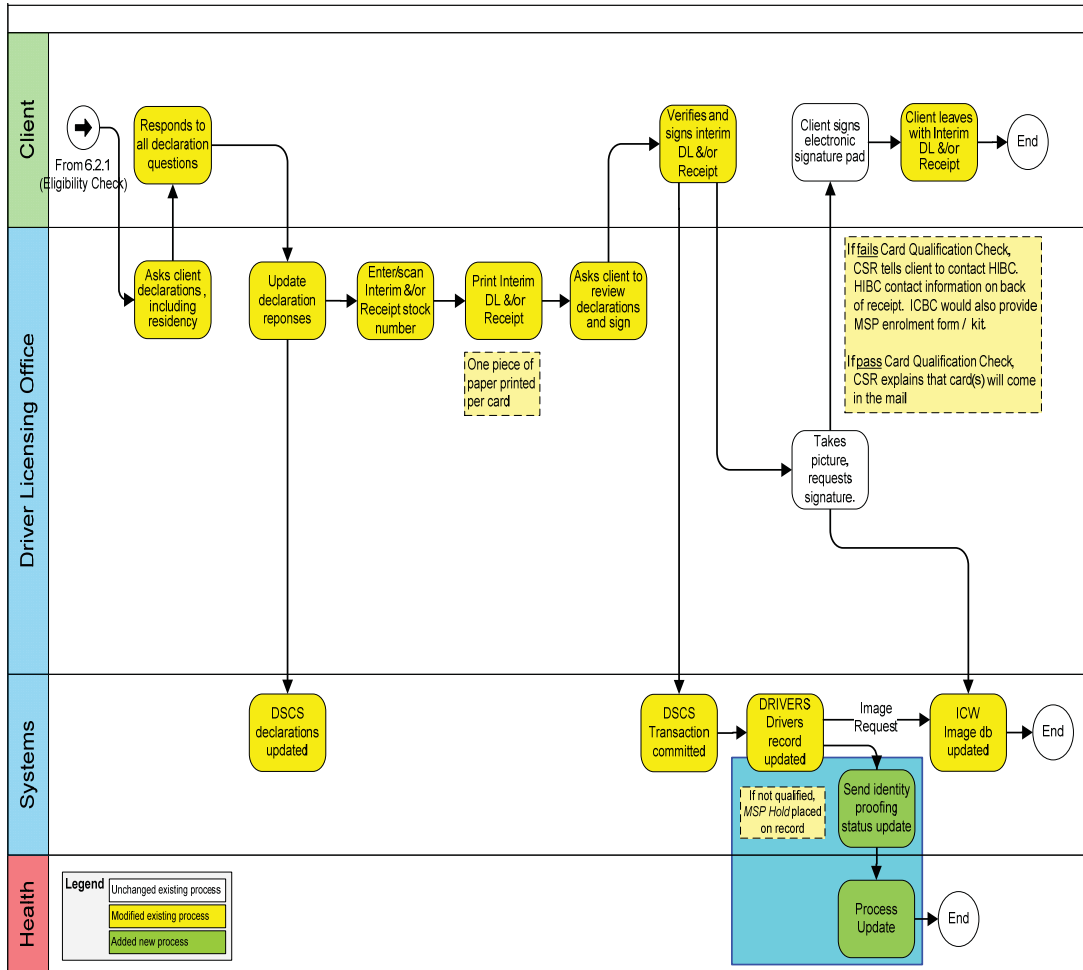
| Card Qualification Check Steps                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| From: HIBC Manage Identity Proofing Events, March 2, 2012 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Step 1</b>                                             | <p>Attempt to Match to PHN</p> <p>If the PHN is provided, the following must be true in order to match:</p> <ul style="list-style-type: none"> <li>• R&amp;PB has an MSP beneficiary record with the exact PHN</li> <li>• The MSP beneficiary record for the provided PHN matches the provided information <ul style="list-style-type: none"> <li>○ First name (ignore characters past the first 12)</li> <li>○ Middle name (ignore characters past the first 12)</li> <li>○ Last name (ignore characters past the first 18)</li> <li>○ Gender (if the gender in R&amp;PB is "U", ignore gender for matching purposes)</li> <li>○ Date of birth (if the day portion of the date in R&amp;PB is "00", only match on the year and month)</li> </ul> </li> </ul> <p>The system will not include a PHN that represents an incarcerated person.</p> <p>If the PHN is not provided, the following must be true in order to match:</p> <ul style="list-style-type: none"> <li>• R&amp;PB has one and only one MSP beneficiary record that matches the provided information (see person matching criteria above)</li> </ul> <p>Note that if the PHN is provided but fails to match, then the PHN is not echoed back in the response.</p>                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Step 2</b>                                             | <p>Evaluate for Photo Card Criteria</p> <p>If all of the following criteria are true, the qualification check will pass:</p> <ul style="list-style-type: none"> <li>• The value of the Residency Response element in the request is "Y"</li> <li>• The PHN is on an account with active coverage. For the purposes of card qualification, active coverage means that the account has an effective date and has a cancellation date that is blank or in the future, and the effective date and the cancel date are not the same.</li> <li>• The active account for the PHN that is not pending cancellation. Pending cancellation means that there is a cancellation date on the account that is within 60 days, the cancel code is not "P", and there is no concurrent account set up to take over on the cancellation date.</li> <li>• The PHN is not suppressed for card production. This does not include any active card suppression due to an unresolved ICBC hold condition.</li> <li>• There is an active account for the PHN where the group is enabled for card issuance.*</li> <li>• The MSP beneficiary is more than 18 years and 6 months old.</li> <li>• The MSP beneficiary is not a temp doc holder</li> <li>• The coverage effective date is not more than 31 days in the future.</li> <li>• There is no other card in CARD_REQUEST with status of "Pending" or "Released" (in other words "in progress").</li> </ul> <p>*To test if the group is enabled for card issuance, check the SEND_CARECARD attribute of the GROUP table.</p> <p>To test if an MSP beneficiary is a Temporary Document Holder, check the cancellation code of "D"</p> |



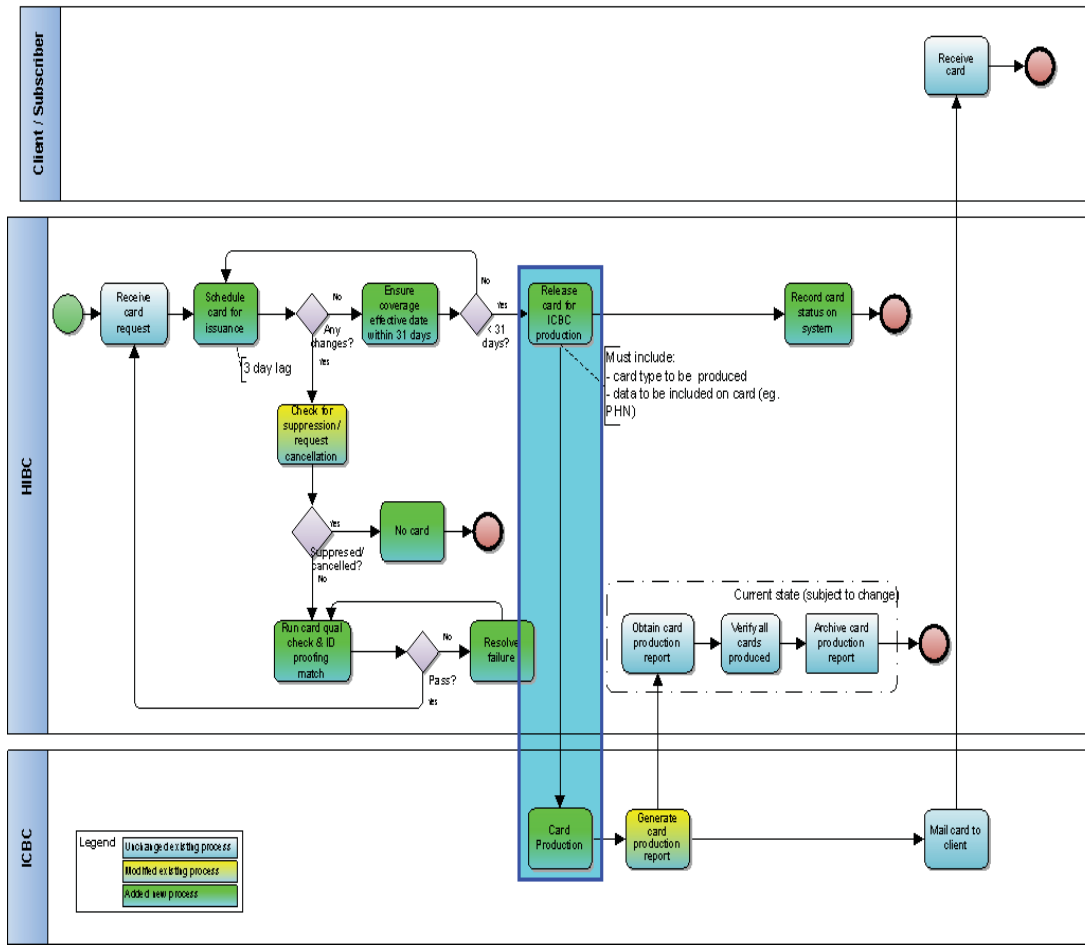
|               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Step 3</b> | <p>Respond “Yes” to Photo, “Yes” to Combo, Matched PHN:</p> <ul style="list-style-type: none"> <li>• If the request is matched to a PHN, include the matched PHN in the response.</li> <li>• If the request qualifies for a photo card, include the value “PHOTO” as a sub-element of the “qualified Cards” element.</li> <li>• If the request qualifies for a combo card, include the value “COMBO” as a sub-element of the “qualified Cards” element.</li> <li>• If the request is matched to a PHN, then include the coverage effective date (for the Card Carrier) in the response using the account with the most recent coverage effective date.</li> </ul> <p>If it is a YES reply, ICBC determines whether the individual gets a combo card or not, which is based on several things. For example :</p> <ul style="list-style-type: none"> <li>• Do they have any ICBC or Govt debt (fines) outstanding - if so they can get a standalone</li> <li>• Do they more that 3 restrictions on their Drivers License – if so we cannot print a PHN on the back of the card – there is no room – they would get a standalone.</li> </ul> <p>Respond “No”:<br/>The ICBC agent will direct the client back to HIBC.</p> |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## B. Identity Proofing Information Flow

Note: the eligibility check at the beginning is the CQC check step



### C. Card Issuance for Photo and Non-Photo Cards



## D. Card Data Elements

### Standalone and Combo card Data Elements:

- Front of the card: last name, given name, DL number, issued date [yyy-mm-dd], expiry date [yyyy-mm-dd], birth date [yyy-mm-dd], restrictions/endorsements, class, weight, height, sex, eye colour, hair colour, address, under 19 until, portrait image, signature, secondary image, birth year, W indicator
- Back of the card: restrictions label, restrictions text, endorsements label, endorsements text, class icons, duplicate indicators, PDF417 barcode, PHN, 1-D barcode with the card serial number only
- The Combo card will have the chip.

#### Note:

- novice DL and combo card will have the same data elements with the addition of: Earliest exam date [yyyy-mm-dd] will be on the front of the card.
- learners DL and combo card will have the same data elements with the addition of: Earliest exam date [yyyy-mm-dd] will be on the front of the card.

### Standalone Card Data Elements

- Front of the card: last name, given name, issued date [yyy-mm-dd], expiry date [yyyy-mm-dd], birth date [yyy-mm-dd], sex, address, portrait image, signature, secondary image, birth year
- Back of the card: PDF417 barcode, PHN, non DL indicator, 1-D barcode with the card serial number only
- The standalone card will ~~not~~ have the chip.

### Non photo card Data Elements

HIBC will provide the data content for non-photo BC Services cards, including Ministry of Health data for the magnetic stripe. There will be a magnetic stripe containing health information on the photo and non-photo BC Services Cards that supports current health care eligibility checking.

- Front of the card: last name, given name, issued date [yyy-mm-dd], expiry date [yyyy-mm-dd], birth date [yyy-mm-dd], sex, address, coat of arms, birth year
- Back of the card: duplicate indicators, PDF417 barcode, PHN, non DL indicator, MSP expiry [yyyy-mm-dd], 1-D barcode with the card serial number only
- The non-photo card will have the chip.

### Magnetic Stripe Data Elements

The plan is for health points of service to continue to use the magstripe on all of the new BC Services Cards so that transition by health care points of service to read the chips can be planned and adopted gradually.

The DL, BCID, combo and BCSC cards contain the 3 track magnetic stripe specified by the AAMVA Magnetic Stripe Data Format. The standalone photo and non photo cards have the 2 track magnetic stripe specified in section 3.3 Ministry of Health Magnetic Stripe Data Format. This will match the current Care Card standard. This matches the data on the front of the card with some truncations.

| Data | Combo DL<br>BCSC | Standalone BCSC/Non Photo |
|------|------------------|---------------------------|
|------|------------------|---------------------------|

|             |             |             |
|-------------|-------------|-------------|
| Name        | Y           | Y           |
| Address     | Y           | Y           |
| City        | Y           | Y           |
| Province    | Y           | Y           |
| Postal code | Y           | Y           |
| Card #      | Y           | Y           |
| Expiry date | Y           | Y           |
| Birth date  | Y           | Y           |
| Gender      | Y           | N           |
| Height      | Y           | N           |
| Weight      | Y           | N           |
| Hair colour | Y           | N           |
| Eye colour  | Y           | N           |
| PHN         | Y [track 3] | Y [track 2] |

#### Magnetic Stripe Data Elements

#### 2-D Barcodes

PDF417 barcode on the rear of the cards is specified by the AAMVA Magnetic Stripe Data Format. The standalone card will have the 2-D barcode in the same AAMVA format. The standalone cards will NOT have the PHN in the 2D barcode. [There is also a 1-D barcode on the back of the card with the card serial number only].

| Data        | Combo DL BCSC | Standalone BCSC/Non Photo |
|-------------|---------------|---------------------------|
| Name        | Y             | Y                         |
| Address     | Y             | Y                         |
| City        | Y             | Y                         |
| Province    | Y             | Y                         |
| Postal code | Y             | Y                         |
| Card #      | Y             | Y                         |
| Expiry date | Y             | Y                         |
| Birth date  | Y             | Y                         |
| Gender      | Y             | N                         |
| Height      | Y             | N                         |
| Weight      | Y             | N                         |
| Hair colour | Y             | N                         |
| Eye colour  | Y             | N                         |
| PHN         | Y             | N                         |

#### 2-D barcode Data Elements

## Identifiers

These identifiers are listed in the PIA [authority table in the charts on page 18-23](#).

| Identifier                                | Exchanged Between                                                                                                                                                                                                                                                      | Meaning                                                                                                                                                                                                                              |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BCDL number                               | ICBC and HIBC if used as primary or secondary id docs;<br>ICBC and LCTZ if used as primary id doc                                                                                                                                                                      | Unique number representing an issued BC driver licence card                                                                                                                                                                          |
| BCID number                               | Same as BCDL above                                                                                                                                                                                                                                                     | Unique number representing an issued BCID card                                                                                                                                                                                       |
| ICBC Client Identifier                    | ICBC to HIBC for identity proofing event;<br>ICBC to LCTZ about identities and issued cards                                                                                                                                                                            | Unique number representing a client (individual) registered in the ICBC Client database; used to link BCDL, BCID and the individual                                                                                                  |
| ID Proof Reference number                 | ICBC to HIBC for identity proofing event, about issued cards;<br>HIBC to ICBC about card MSP holds                                                                                                                                                                     | Unique number representing a counter visit at ICBC; generated from ICBC Client Identifier + timestamp                                                                                                                                |
| Card Issuance Request number              | HIBC to ICBC for card request;<br>ICBC to HIBC to about issued cards from card request                                                                                                                                                                                 | Unique number representing a card request at HIBC, generated by ICBC (11 digits)                                                                                                                                                     |
| PHN                                       | ICBC to HIBC for notifications, card qualification check, identity proofing event;<br>HIBC to ICBC to respond to card qualification check, or for non-photo card requests;<br>ICBC to LCTZ for linking issued cards with Health clients;<br>LCTZ to Health for linking | Unique number representing a client (individual) registered in the Health Client Registry; does not imply enrollment in MSP, but pre-requisite for enrollment in MSP                                                                 |
| Primary Doc Identifier                    | ICBC to HIBC for identity proofing event;<br>ICBC to LCTZ for issued cards                                                                                                                                                                                             | Unique number representing an identity document assigned by the issuer of the identity document; e.g. birth certificate number, passport number, BCDL, BCID (see ICBC's list of acceptable primary id)                               |
| Secondary Doc Identifier                  | ICBC to HIBC for identity proofing event                                                                                                                                                                                                                               | Unique number representing an identity document assigned by the issuer of the identity document; e.g. birth certificate number, passport number, native status card number, employee id (see ICBC's list of acceptable secondary id) |
| Card Serial Number                        | ICBC to HIBC about issued cards, returned/resent mail;<br>ICBC to LCTZ about identities and issued cards                                                                                                                                                               | Unique number representing a card                                                                                                                                                                                                    |
| Primary Account Number <sup>i</sup> (PAN) | ICBC to LCTZ about identities and issued cards                                                                                                                                                                                                                         | Unique number representing a chip; provided as encrypted data element to minimize exposure                                                                                                                                           |
| Health Directed Identifier (HDID)         | LCTZ to Health about individuals who were issued cards<br><br>(*This is out of scope of this set of PIAs but will come later in the Health PIA looking at the relationship between the PIISP and EMPI)                                                                 | Unique number representing the client (individual) that is established between LCTZ and Health, instead of using PHN                                                                                                                 |

## PRIVACY IMPACT ASSESSMENT

### I BASIC INFORMATION – BC SERVICES CARD – PHN on combined Driver's Licence and BC Services Card

#### 1. Ministry/Public Body and Program Area.

|                |                                                                    |
|----------------|--------------------------------------------------------------------|
| Ministry       | Ministry of Health                                                 |
| Division       | Health Sector Information Management & Technology Services (HSIMT) |
| Branch/Section | Business Management Office (BMO)                                   |
| Program        | BC Services Card – Transforming the BC CareCard                    |

#### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

|                |                                                     |
|----------------|-----------------------------------------------------|
| Name, Title    | Derek Laine Farrell, Transformation Project Manager |
| Branch/Section | Business Management Office                          |
| Phone Number   | 250-952-6121                                        |
| E-Mail         | Derek.LaineFarrell@gov.bc.ca                        |

#### 3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

In preparation and the follow on production of this PIA, the following questions were provided by the eHealth Privacy Branch to guide what information is needed to be included in the assessment:

|                                                                   |                                                                                                         |
|-------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| • Does the proposal / project deal with P.I.?                     | Yes.                                                                                                    |
| • Is there an existing PIA?                                       | Yes. A Conceptual PIA was produced in February 2011 for the Office of Information Privacy Commissioner. |
| • Is there a change to the collection, use or disclosure of P.I.? | Yes                                                                                                     |
| • Are there any security aspects involved?                        | Yes                                                                                                     |

### BACKGROUND

The BC Medical Services Plan (MSP) was enacted in 1965 under the legislation contained in the Medicare Protection Act. In 2005, MOH entered into an alternative services delivery contract with Health Insurance BC (HIBC) /MAXIMUS BC. The responsibility for the Medical Services Plan Claims System (MSP) transitioned from the Ministry of Health (MOH) to Health Insurance BC (HIBC) in April 2005. All current and future related policy / legislative changes remained within the Medical Services Division at MOHS.

The current Care Card administration, production and distribution were transferred to HIBC including the supporting systems which are managed by MAXIMUS BC.

The BC Services Card Project is a joint initiative between the Ministries of Health (MOH), Citizens' Services (CITZ), Public Safety and Solicitor General (PSSG) and the Insurance Corporation of BC (ICBC). The project will leverage existing government systems and business processes including ICBC driver's licence technology, front counter services and identity management processes in addition to Health's Medical Services Plan (MSP) administration.

On June 2, 2011 amendments were made to the Medicare Protection Act to enable the ministry to transform the current CareCard program and systems to introduce a more secure card that would adopt chip technology currently in use by the banking industry in addition to the magnetic stripe (magstripe) that is currently on the reverse side of the CareCard.

The plan is for health points of service to continue to use the magstripe on all of the new BC Services Cards so that transition by health care points of service to read the chips can be planned and adopted gradually. However, the magstripe on the combined Driver's License and BC Services Card follows the American Association of Motor Vehicle Administrators (AAMVA) standards which cannot be modified for a combined Driver's Licence/BC Services Card use. The current CareCard uses the first two tracks of the magstripe to interface with various different swipe readers employed at the points of service. The AAMVA standard uses the first two tracks of the magstripe but part of the third track is available for jurisdictional use. (See Appendix A for details of the magnetic stripe tracks and data fields.)

It should be noted that the combined Drivers Licence/BC Services card will be used in other parts of Canada and internationally to gain access to medical services provided by physicians and other health care practitioners. Under the AAMVA standards, the magnetic stripe can be read in these jurisdictions by agencies which need to access data on the card. E.g. law enforcement.

The scope of this PIA covers the addition of the Personal Health Number (PHN) to the magstripe on track 3 of the combined BC Drivers Licence/BC Services Card.

All other BC services Cards will be health only cards and can carry the same magstripe format used on the existing CareCard.

#### **4. Purpose/Objectives of the initiative (if statutory, provide citation).**

The objective of the initiative to add the PHN to the magstripe on the combined Drivers Licence/BC Services card is to enable health care points of service to continue to use the installed base of hardware and software while they are planning for the transition to the chip reader technology. It is proposed that the PHN be added to track three in the magstripe so that programmable swipe card readers can still be used. This will entail some reprogramming of the existing card reader inventory at the points of service to capture the PHN from either track one or track three. The PHN will be printed on the reverse side of the combination card for health care points of service use in the event their automated systems are not operable / unavailable.

While there is no statutory obligation to issue a card, the use of the current CareCard with its magstripe has become a *de facto* standard across the BC health care sector for ease of indentifying MSP beneficiaries who attend their facilities. If the magstripe on the combined BC Drivers Licence/BC Services Card did not have the PHN, this would increase the time to process residents at points of service and be subject to keying errors.



**5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

***Health Care Providers and Points of Service:***

In order for public service providers to provide services, including health care, to the correct individual and to ensure the high assurance of a combined Drivers Licence/BC Services Card, a balance is required between access and privacy. Accordingly, the card will adhere to the **need to know** and **least privilege** access principles to minimize privacy impacts, as defined in the BC Government's *Core Policy and Procedure Manual*:

- **Need to Know:** A privacy principle where access is restricted to authorized individuals whose duties require such access. Individuals are not entitled to access merely because of status, rank or office. This will be the governing principle of this initiative: its purpose is to minimise privacy breaches as much as possible.
- **Least Privilege:** A security principle requiring that each subject in a system be granted the most restrictive set of privileges (or lowest clearance) needed for the performance of authorized tasks. The application of this principle limits the damage that can result from accident, error or unauthorized use.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

A conceptual PIA was produced for the BC Services Card initiative in February 2011 for the OIPC.

A Conceptual Design phase PIA is being drafted in parallel with this PIA. It will describe the project in more detail. Additionally, individual PIA's will be completed by each partner organization in tandem with this PIA and additionally in the Detailed Design and Implementation phases for each Release of the project.

**IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO [X. SIGNATURES](#).**

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have altered the definition of personal information from "recorded information about an identifiable individual" to "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted. The amendments also generally alter the definition of public body employee to include a volunteer, and extend a public body's responsibilities under Part 3 of the Act to its employees, officers and directors and to its service providers and their employees, associates or affiliates.

## **II DESCRIPTIVE INFORMATION**

**1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information. [See note above about the amended definition of personal information.]**

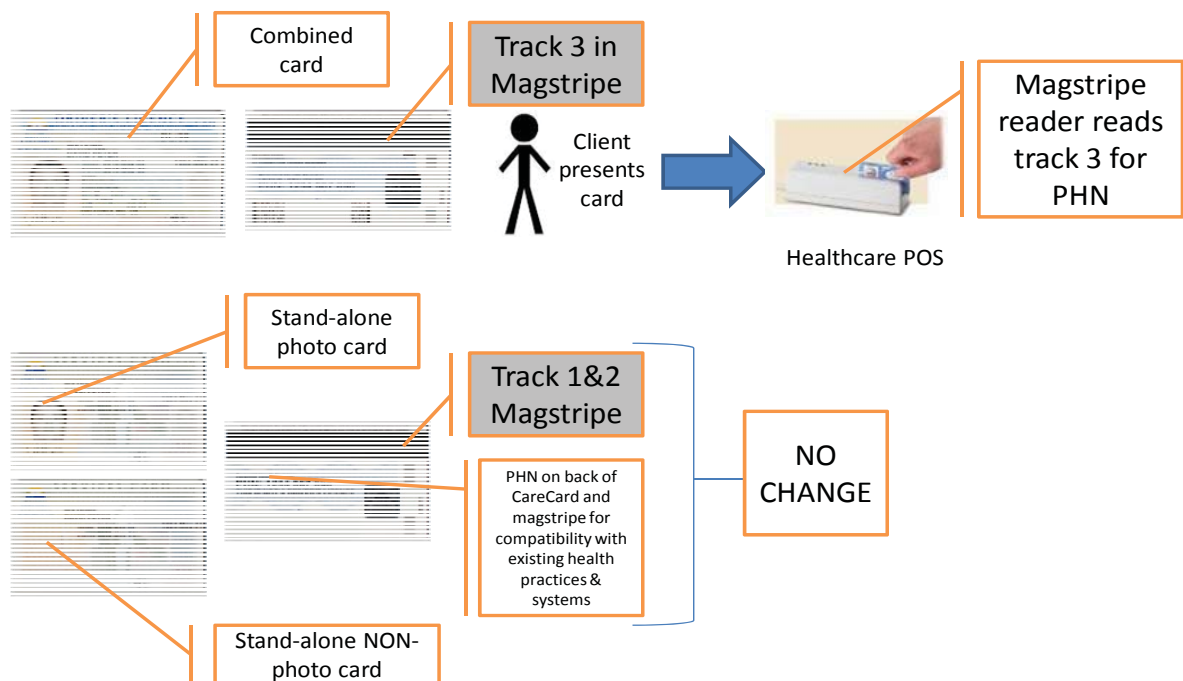
*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

Every eligible British Columbian will be issued a new BC Services Card which will contain personal information about them. From a random survey completed by Angus Reid in August 2011, 74% of BC's population indicated they were likely to take the option of a combined Drivers Licence/BC Services Card. The combined card will contain the Personal Health Number (PHN) and person's Photograph, Name, Birth Date, Address, Height, Weight, Hair Colour and Eye Colour on the face or reverse side of the card.

A complete list of personally identifiable data elements is attached at Appendix A, including the data stored in the magstripe.

2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.

### PIA – PHN on combined Drivers' Licence/BC Services Card



The above diagram serves to illustrate that this PIA has a narrow focus on the addition of the PHN to the magstripe on the reverse side of the combined Drivers' Licence and BC Services Card only. The stand alone cards will continue to use the current CareCard magstripe (i.e. tracks 1 and 2) so that all Healthcare Points of Service (POS) can continue to use the cards until such time they have transitioned to the proximity chip readers.

The transfer of the personal data to ICBC's card producer to manufacture the cards will be covered in the Conceptual Design PIA. At this time, we are aware that government standards will be followed to protect the

data through encryption of the data and / or the network connections. Further details will be required on how the data is stored prior to producing the cards and the disposition of the personal information after cards have been manufactured, including technical security and physical security design.

**III PERSONAL INFORMATION COLLECTION**(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPPA Act")

|                                          | Yes | No | n/a |
|------------------------------------------|-----|----|-----|
| Is personal information being collected? | x   |    |     |

Only personal information that is required to issue the BC Services Card will be collected from the client. The information that will be collected, used or disclosed to enable use of the BC Services Card is detailed in **APPENDIX E**.

**IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)**

**1) Authorization for Collection:**

No personal information may be collected by or for a public body unless authorized under the FOIPPA Act (as covered by numbers i, ii, or iii below).

|      |                                                                                                                          | Yes | No | n/a |
|------|--------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Has the collection of personal information been specifically authorized by, or under, an Act, other than the FOIPPA Act? | x   |    |     |
|      | <b>If yes, please specify the name of the Act and relevant section</b><br>Medicare Protection Act                        |     |    |     |
| ii.  | Has the personal information been collected for law enforcement purposes?                                                |     | x  |     |
| iii. | Is the personal information directly related to, and necessary for, an operating program or activity of the public body? | x   |    |     |

**If none of the above questions has been answered "yes", your office does not have the authority under the FOIPPA Act to collect the personal information in question. Please contact your Director/Manager of Information and Privacy (DMIP) for ministries or the position responsible for FOI and Privacy Coordination (FOIPPA Coordinator).**

**2) How will the personal information be collected?**

A public body must collect personal information or cause personal information to be collected directly from the individual the information is about, with certain specific exceptions.

|                                                                                                               | Yes | No | n/a |
|---------------------------------------------------------------------------------------------------------------|-----|----|-----|
| Will the personal information be collected <u>directly</u> from the individual that the information is about? | x   |    |     |

**IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO [3. NOTIFICATION TO COLLECT INFORMATION](#).**

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

**III PERSONAL INFORMATION COLLECTION cont'd**

|       |                                                                                                                                                                            | Yes | No | n/a |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.    | Did the individual the information is about authorize another method of collection?                                                                                        |     | x  |     |
| ii.   | Has indirect collection been authorized by the Information and Privacy Commissioner?                                                                                       |     |    | x   |
| iii.  | Has indirect collection been authorized by another enactment?                                                                                                              |     |    | x   |
|       | <b>If yes, please specify the name of the Act and relevant section(s)</b>                                                                                                  |     |    |     |
| iv.   | Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?          |     | x  |     |
| v.    | Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?   |     | x  |     |
| vi.   | Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary? |     | x  |     |
| vii.  | Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?                                       |     | x  |     |
| viii. | Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?                                                              | x   |    |     |
| ix.   | Is the personal information being collected for the purpose of law enforcement?                                                                                            |     | x  |     |
| x.*   | Is the public body collecting personal information disclosed to it under section 33, section 33.1, section 33.2, section 34, section 35, or section 36 of the FOIPP Act?   | x   |    |     |
|       | <b>Specify relevant section(s) or subsections that apply.</b><br>33.1(b), 33.1(d), 33.1(e), 33.1(i.1), 33.2, 34, 35(1)(c)(ii), 36(1)                                       |     |    |     |
|       | <b>Additional details as required (e.g., explanation of method of collection)</b>                                                                                          |     |    |     |

***If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your DMIP or FOIPP Coordinator.***

**3) Notification to collect information**

***A public body must ensure that an individual from whom it collects personal information or causes personal information to be collected is notified of the collection as outlined below.***

**III PERSONAL INFORMATION COLLECTION cont'd**

|           |                                                                                              | Yes | No | n/a |
|-----------|----------------------------------------------------------------------------------------------|-----|----|-----|
| <b>i.</b> | Has the individual whose personal information is being collected, been informed of:          |     |    |     |
|           | (a) the purpose for collection?                                                              | x   |    |     |
|           | (b) the legal authority for collection?                                                      | x   |    |     |
|           | (c) the contact information of the person who can answer questions regarding the collection? | x   |    |     |

**Notification is not required if the answer is “yes” to any of the following:**

|             |                                                                                                                                | Yes | No | n/a |
|-------------|--------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| <b>ii.</b>  | Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?  |     |    | x   |
| <b>iii.</b> | Has the Minister responsible for the FOIPP Act excused your public body from complying because it would                        |     |    |     |
|             | (a) result in the collection of inaccurate information?                                                                        |     |    | x   |
|             | <b>or</b>                                                                                                                      |     |    |     |
|             | (b) defeat the purpose or prejudice the use for which the personal information is collected?                                   |     |    | x   |
| <b>iv.</b>  | The information                                                                                                                |     |    |     |
|             | (a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, <b>and</b> |     |    | x   |
|             | (b) is not collected directly from the individual the information is about                                                     |     |    |     |
|             | <b>Additional details as required (e.g., method of notification)</b>                                                           |     |    |     |

***If you have not provided the required notification as outlined above, please contact your DMIP or FOIPP Coordinator.***

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

|                                     | Yes | No | n/a |
|-------------------------------------|-----|----|-----|
| Is personal information being used? | x   |    |     |

Only personal information that is required to issue the BC Services Card will be used by the system. Card use is Client controlled and will be triggered only by the Client to establish identity and eligibility for Government services.

**IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO V. DISCLOSURE OF PERSONAL INFORMATION**

***Under the FOIPP Act, a public body must ensure that personal information in its custody or under its control is only used for certain specified purposes as outlined below.***

The public body **must** check one or more of the authorities listed below:

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Yes | No | n/a |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1.   | Has the individual the personal information is about consented to the use?<br>(Note: Supporting documentation must be on file.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | x   |    |     |
| 2.   | Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | x   |    |     |
|      | <p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>The personal information is required to enrol or re-enrol each eligible British Columbian in the Medical Services Plan so that the costs of the medical services they receive are covered under the plan. The combined Drivers' Licence/BC Services Card will provide medical service providers with strong assurance that the person receiving the service is eligible.</p> <p>The secondary use of the personal information is to enable the medical service providers to bill the Ministry of Health for their services for each eligible patient and keep health records for reference in further encounters. The personal information for some British Columbians may be used in other health related programs upon the patient's application for these services. E.g. Premium Assistance.</p> |     |    |     |
| 3. * | If the personal information was disclosed to the public body under section 33, section 33.1, section 33.2, section 34, section 35 or section 36, is the information being used for that same purpose?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |    | x   |
|      | <b>Specify subsection(s) being applied</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |    |     |

***If you have not checked one of the above, you do not have the authority to use the information. Please contact your DMIP or FOIPP Coordinator.***

## V DISCLOSURE OF PERSONAL INFORMATION

(Section 33, section 33.1, section 33.2, section 34, section 35 and section 36 of the FOIPP Act)

|                                          | Yes | No | n/a |
|------------------------------------------|-----|----|-----|
| Is personal information being disclosed? | x   |    |     |

Only personal information that is authorized under the Medicare Protection Act will be disclosed. Each program area will need to ensure that they only disclose information that they are authorized under the FOIPP Act to disclose. The personal information will only be used by those individuals in the programs areas with a need to know and have authorization from the card holder.

### IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION.

*A public body must ensure that personal information in its custody or under its control is disclosed only as permitted under sections 33, 33.1, 33.2, 34, 35, and 36 of the FOIPP Act.*

#### 1) Disclosure of Personal Information

Sections 33, 33.1 and 33.2 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please check the main authorization(s) for disclosure below.

**(Note that the numbering is taken from sections 33.1 and 33.2 of the FOIPP Act.)**

| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                                       | Yes | No | n/a |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (1)(a)   | In accordance with Part 2                                                                                                                                                                                                                 |     |    | x   |
| (1)(a.1) | If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):<br><br>22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if              |     |    |     |
|          | (e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,                                                               |     |    | x   |
|          | (f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,                                                                                                                        |     |    | x   |
|          | (h) the information is about expenses incurred by the third party while travelling at the expense of a public body,                                                                                                                       |     |    | x   |
|          | (i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or |     |    | x   |
|          |                                                                                                                                                                                                                                           |     |    |     |



| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                                                                          | Yes | No | n/a |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|          | (j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c). |     |    | x   |
| (1)(b)   | If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable<br>(Note: Supporting documentation must be on file)                                             |     |    | x   |
| (1)(c)   | In accordance with an enactment of British Columbia or Canada that authorizes or requires its disclosure                                                                                                                                                                     | x   |    |     |
|          | <b>Specify name of enactment and relevant section(s)</b>                                                                                                                                                                                                                     |     |    |     |
|          | <b>Medicare Protection Act - Section 5 (6)</b>                                                                                                                                                                                                                               |     |    |     |
| (1)(c.1) | If the personal information is made available to the public in British Columbia under an enactment, other than the <i>Freedom of Information and Protection of Privacy Act</i> , that authorizes or requires the information to be made public                               |     |    | x   |
|          | <b>Specify name of enactment and relevant section(s)</b>                                                                                                                                                                                                                     |     |    |     |
| (1)(d)   | In accordance with a provision of a treaty, arrangement or written agreement that<br>(i) authorizes or requires its disclosure, and<br>(ii) is made under an enactment of British Columbia or Canada                                                                         |     |    | x   |
| (1)(e)   | To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if<br>(i) the information is necessary for the performance of the duties of the minister, officer or employee,                            |     | x  |     |
|          | <b>and</b><br>(ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada                                                                                                             |     | x  |     |
|          | <b>If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>                                                                                                                              |     |    |     |
| (1)(e.1) | To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if<br>(i) the information is necessary for the performance of the duties of the individual in relation to the public body,                            |     | x  |     |

| s. 33.1 | Disclosure inside OR outside Canada                                                                                                                                                                                                                                                                | Yes | No | n/a |
|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|         | <b>and</b><br>(ii) in relation to disclosure outside Canada,<br>(A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and<br>(B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada |     | x  |     |
|         | <b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>                                                                                                                                                  |     |    |     |

**V DISCLOSURE OF PERSONAL INFORMATION cont'd**

| s. 33.1 | Disclosure inside OR outside Canada                                                                                                                                                         | Yes | No | n/a |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (1)(f)  | To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister |     | x  |     |
| (1)(g)  | To the Attorney General or legal counsel for the public body, for use in civil proceedings involving the government or public body                                                          |     | x  |     |
| (1)(h)  | To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act                                                    |     | x  |     |
| (1)(i)  | If                                                                                                                                                                                          |     |    |     |
|         | (i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by                                                                |     |    |     |
|         | a. an individual, or                                                                                                                                                                        | x   |    |     |
|         | b. corporation of which the individual the information is about is or was a director or officer,                                                                                            |     | x  |     |
|         | <b>and</b>                                                                                                                                                                                  |     |    |     |
|         | (ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that                                                                                              |     |    |     |
|         | a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or                                                                                    |     | x  |     |
|         | b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction                                                                         |     | x  |     |
| 1(i.1)  | For the purposes of                                                                                                                                                                         |     |    |     |
|         | (i) a payment to be made to or by the government of British Columbia or a public body,                                                                                                      | x   |    |     |
|         |                                                                                                                                                                                             |     |    |     |

| <b>s. 33.1</b> | <b>Disclosure inside OR outside Canada</b>                                                                                                                                                                                                                                                                                                              | <b>Yes</b> | <b>No</b> | <b>n/a</b> |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|------------|
|                | (ii) authorizing, administering, processing, verifying or cancelling such a payment, or                                                                                                                                                                                                                                                                 | x          |           |            |
|                | (iii) resolving an issue regarding such a payment                                                                                                                                                                                                                                                                                                       | x          |           |            |
| <b>(1)(j)</b>  | In the case of the Insurance Corporation of British Columbia, if<br>(i) the information was obtained or compiled by that public body for purposes of insurance provided by the public body, and<br>(ii) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim                                          |            | x<br>x    |            |
| <b>(1)(k)</b>  | For the purposes of                                                                                                                                                                                                                                                                                                                                     |            |           |            |
|                | (i) licensing or registration of motor vehicles or drivers, or                                                                                                                                                                                                                                                                                          |            | x         |            |
|                | (ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences                                                                                                                                                                                                                                                            |            | x         |            |
| <b>(1)(l)</b>  | For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations                                                                                                                                                                    |            | x         |            |
| <b>(1)(m)</b>  | If<br>(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and<br>(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety |            | x<br>x    |            |
| <b>(1)(n)</b>  | So that the next of kin or a friend of an injured, ill or deceased individual may be contacted                                                                                                                                                                                                                                                          |            | x         |            |
| <b>(1)(o)</b>  | In accordance with section 36 (disclosure for archival or historical purposes)                                                                                                                                                                                                                                                                          |            | x         |            |
| <b>(1)(p)</b>  | The disclosure<br>(i) is necessary for                                                                                                                                                                                                                                                                                                                  |            |           |            |
|                | (A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or                                                                 |            | x         |            |
|                | (B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body                                                                                                                                         |            | x         |            |
|                | <b>and</b><br>(ii) in the case of disclosure outside Canada<br>(A) is limited to temporary access and storage for the minimum time necessary for that purpose, and<br>(B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred                                           |            | x<br>x    |            |

If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the *minimum time necessary*

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

| s. 33.1 | Disclosure inside OR outside Canada                                                                                                                                                                                                                                                                                                                                                                                                                            | Yes | No | n/a |
|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (2)     | In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33                                                                                                                                                                                                                                                             |     |    |     |
| (2)(a)  | to another law enforcement agency in Canada                                                                                                                                                                                                                                                                                                                                                                                                                    | x   |    |     |
| (2)(b)  | to a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.                                                                                                                                                                                                                                                                                                          |     | x  |     |
| (3)     | The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.                                                                                                                                                                                                          |     | x  |     |
|         | <b>Additional details as required</b><br><br><b>(2)(a) – Residents who are enrolled in the Medical services Plan may have their personal information disclosed to the Ministry of Attorney General in accordance with the Family Maintenance Enforcement Act (Section 8), Family Relations Act (Sections 39, 98, 99 and 100), and FOI Act (Sections 33(d) and 33(n)) for the purpose of locating missing partners sought in regards to family law matters.</b> |     |    |     |

*If you have not checked any of the above authorizations for disclosure or require clarification, you should contact your DMIP or FOIPP Coordinator.*

| s. 33.2 | Disclosure inside Canada only                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Yes | No | n/a |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a)     | For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | x   |    |     |
|         | <b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b><br><br><b>Original purpose is for enrolling BC residents in the Medical Services Plan (MSP) and enabling registered practitioners to bill for claims under MSP.</b><br><br><b>Secondary, consistent use is to provide historic data for the purposes of answering questions / issues with patient and practitioner inquiries, including the ability to access medical records for patient safety purposes. E.g. DURs (Drug Utilization Reviews) to prevent bad drug interactions with existing prescribed medications etc.</b> |     |    |     |
| (b)     | To comply with a subpoena, warrant or order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | x   |    |     |

| s. 33.2 | Disclosure inside Canada only                                                                                                                                                                                                                                               | Yes | No | n/a |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (c)     | To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister                                                                                                       | x   |    |     |
| (d)     | To an officer or employee of a public body or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties of the officer, employee or minister to whom the information is disclosed | x   |    |     |
| (e)     | To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister                                                                                                | x   |    |     |
| (f)     | To the auditor general or any other prescribed person or body for audit purposes                                                                                                                                                                                            | x   |    |     |
| (g)     | To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem                                                                                                                                  |     | x  |     |
| (h)     | To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry                                                                                                                           |     | x  |     |
| (i)     | To a public body or a law enforcement agency in Canada to assist in a specific investigation                                                                                                                                                                                |     |    |     |
|         | (i) undertaken with a view to a law enforcement proceeding, or                                                                                                                                                                                                              | x   |    |     |
|         | (ii) from which a law enforcement proceeding is likely to result                                                                                                                                                                                                            | x   |    |     |
| (j)     | To the archives of the government of British Columbia or the archives of a public body, for archival purposes                                                                                                                                                               | x   |    |     |
| (k)     | In accordance with section 35 (disclosure for research or statistical purposes)                                                                                                                                                                                             |     | x  |     |
|         | <b>Additional details as required</b>                                                                                                                                                                                                                                       |     |    |     |

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

### 2) Systematic or Repetitious Disclosure/Exchanges?

|      |                                                                                                                               | Yes | No | n/a |
|------|-------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Do the disclosures of personal information under section 33.2 occur on a regular basis?                                       | x   |    |     |
| ii.  | Has an Information Sharing Agreement been completed for these disclosures/exchanges?                                          | x   |    |     |
| iii. | Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ? |     | x  |     |

**Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under**

section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.

### 3) Research or Statistical Purposes (Section 35)

|                                                                                                          | Yes | No | n/a |
|----------------------------------------------------------------------------------------------------------|-----|----|-----|
| Has a researcher requested access to personal information in an identifiable form for research purposes? |     | x  |     |

If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact your DMIP or FOIPP Coordinator for assistance.

**Please note:** Research using personal information may only be conducted if it meets all of the terms of section 35.

### 4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the *School Act*) may disclose personal information or cause personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

|     |                                                                                                      | Yes | No | n/a |
|-----|------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a) | The disclosure would not be an unreasonable invasion of personal privacy under section 22            | x   |    |     |
| (b) | The disclosure is for historical research and is in accordance with section 35 (research agreements) |     |    | x   |
| (c) | The information is about someone who has been dead for 20 or more years                              |     |    | x   |
| (d) | The information is in a record that has been in existence for 100 or more years                      |     |    | x   |

**If you have not answered “yes” to any of the above authorizations for disclosure or if you require clarification, please contact your DMIP or FOIPP Coordinator.**

## VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION

(Section 28 and section 29 of the FOIPP Act)

If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

Efforts to ensure that personal information is accurate and complete are outside the scope of this privacy impact assessment. However, processes are in place today at ICBC, Service BC and MOH to ensure personal information is accurate and complete. Since this project intends to leverage existing processes as much as possible, and accuracy and correction of personal information are key privacy requirements in any project, these considerations will be incorporated.

|    |                                                                                                                                                            | Yes                                                                                  | No | n/a |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----|-----|
| 1. | Are there procedures in place to enable an individual to request/review a copy of their own personal information?                                          | x                                                                                    |    |     |
| 2. | Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file? | x                                                                                    |    |     |
| 3. | If personal information is corrected, are there procedures in place to notify other holders of this information?                                           | x                                                                                    |    |     |
|    | If yes, please provide the name of the policy and/or procedures, a contact person and phone number.                                                        |                                                                                      |    |     |
|    | Policy/procedure:                                                                                                                                          | HIBC Work Instruction 8.4.2 'Collection, Use and Correction of Personal Information' |    |     |
|    | Contact person:                                                                                                                                            | Bev Hooper, Chief Privacy Officer, HIBC                                              |    |     |
|    | Phone number:                                                                                                                                              | 250-405-3726                                                                         |    |     |
|    | Additional details as required                                                                                                                             |                                                                                      |    |     |

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator for further clarification.***



## VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the FOIP Act)

**Note:** For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the Signatures section.

For PIAs that do not involve systems initiatives, this section should be completed by the Branch or DMIP/FOI Coordinator completing the PIA. In this case, the signature of the systems representative is not required.

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Yes                                   | No | n/a |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|----|-----|
| 1. | Is there reasonable technical security in place to protect against unauthorized access or disclosure?<br><br><b>Note:</b> The PHN is stored in 'character' format in the magstripe and will not be encrypted including the other personal data. This follows current industry practices outside of the banking industry. For the most part, the data is also printed on the face or reverse of the card for identification purposes in health care points of service without magstripe readers.                                                                                                       |                                       | x  |     |
| 2. | Is there reasonable physical security in place to protect against unauthorized access or disclosure?<br><br><b>Note:</b> The custody of the card is in the hands of the BC resident at all times except when provided temporarily to the health care provider's point of service. Essentially, the card holder is responsible for ensuring the card is secure and that it is retrieved from the point of service. Lost and stolen cards while not insignificant, are an issue that will become better managed when the chip version of the cards are issued to BC residents over the 5 year roll-out. | x                                     |    |     |
| 3. | Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?                                                                                                                                                                                                                                                                                                                                                                                                                                          | x                                     |    |     |
|    | <b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                       |    |     |
|    | Policy/procedure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | HIBC Security Policies and Procedures |    |     |
|    | Contact person:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Kent Berger-North, Security Officer   |    |     |
|    | Phone number:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | (250) 405-3791                        |    |     |
|    | <b>Additional details as required</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                       |    |     |
| 4. | Have user access profiles been assigned on a need-to-know basis?<br><br>As the combined Drivers Licence/BC Services Card can be used anywhere in BC, Canada and internationally, the answer is unknown.                                                                                                                                                                                                                                                                                                                                                                                               |                                       |    | x   |



|                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |   |  |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--|--|
| 5.                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Do controls and procedures exist for the authority to add, change or delete personal information?</p> <p>As far as the MOH data on the combined card is concerned, only authorized Support Users and application developers will have access to MSP / R&amp;PB production systems and the development / test environments respectively that provide the data to the card manufacturer, and will follow the policies and standards defined in the MAXIMUS BC Security Policy v 2.3 dated October 2005.</p> <p>ICBC data is covered under their own policies and procedures.</p>                                                                           | x |  |  |
| 6.                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?</p> <p>Additionally, all card requests sent to the card manufacturer will be tracked to final delivery to the BC resident via mail.</p>                                                                                                                                                                                                                                                                                                                                                         | x |  |  |
| <p><b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b></p> <p>Regular annual audits of all HIBC systems are conducted by an external auditor including SysTrust assessments.</p> <p>Ad hoc reviews are conducted on the different systems to make sure that users who have access to these systems have the appropriate access according to their job functions.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |   |  |  |
| 7.                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Does the audit identify inappropriate accesses to the system?</p> <p><b>Note:</b> A series of Security Threat and Risk Assessments are being undertaken by the Project Team. BC Services Card will only proceed with acceptance or satisfactory resolution of the results of these assessments.</p> <p>Each organization's PIA will detail the audit capabilities within each of the partner's systems.</p> <p>A report that tracks transactions against User IDs is produced on an ad hoc basis and as requested by management to monitor suspected inappropriate accesses to the system that stores the data that appears on the BC services Card.</p> | x |  |  |
| <p><b>Additional details</b></p> <p>The personally identifiable data is under the control of the MSP Claims and R&amp;PB Systems.</p>                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |   |  |  |

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator.***

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

|                                                            | Yes | No | n/a |
|------------------------------------------------------------|-----|----|-----|
| Will the information be stored or accessed only in Canada? |     | x  |     |

**Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

|    |                                                                                                                                                                                                                                                                                                                                                                              | Yes | No | n/a |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?                                                                                                                                                                                                     | x   |    |     |
|    | <b>Please explain</b><br>The personal information in the magstripe on the card is in the custody of the BC resident. If a resident is outside of Canada and needs to present his/her combined Drivers Licence/BC Services Card to a health care point of service, or for Driver's Licence or other purposes, this implies he/she is giving consent to share the information. |     |    |     |
| 2. | Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?                                                                                                                                                                  |     |    | x   |
|    | <b>Please explain</b>                                                                                                                                                                                                                                                                                                                                                        |     |    |     |
| 3. | Will the personal information be disclosed under section 33.1(1)(i.1)?                                                                                                                                                                                                                                                                                                       | x   |    |     |
|    | <b>Please explain</b><br>Where the Combined Drivers' Licences / BC Services Card is presented to a health care point of service outside of British Columbia for the purposes of obtaining medical services, the resulting costs of that service are billable to the Medical Services Plan under reciprocal agreements for Out Of Province or Out Of Country claims.          |     |    |     |

***If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact your DMIP or FOIPP Coordinator.***

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

**If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.**

|    |                                                                                                                                                                                                                                                                                                                                                                                                             | Yes | No | n/a |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Do you have an approved records retention and disposition schedule?<br><br>The combined Drivers Licence/BC services Card is not subject to retention schedules. However, the cards will be replaced every 5 years when the resident re-enrols in the Medical Services Plan.                                                                                                                                 |     | x  |     |
| 2. | Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?<br><br>Typically, the use of the card at the health care point of service will result in records being retained for billing purposes which are then sent to the MSP system. These records are subject to a records retention schedule. | x   |    |     |

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your DMIP or Records Officer.***

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**

**IX DIRECTOR/MANAGER OF INFORMATION AND PRIVACY (DMIP) OR FOIPP COORDINATOR REVIEW**

|    |                                                                                                                                                                                                             | Yes | No | n/a |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Have you contacted the individual responsible for the completion of the PIA to discuss the information submitted, in particular those questions identified by an asterisk (*)?                              | x   |    |     |
| 2. | Does the initiative meet the requirements of the FOIPP Act?                                                                                                                                                 | x   |    |     |
| 3. | Is there a mechanism in place to review this PIA, as appropriate, to ensure the information remains current?                                                                                                | x   |    |     |
| 4. | Are you satisfied that the policies/procedures for correction and/or annotation are adequate?                                                                                                               | x   |    |     |
|    | <b>If there is additional information that would support the intended collection, use or disclosure of the personal information, please either insert in the appropriate text box or append to the PIA.</b> |     |    |     |
|    | <b>Comments</b>                                                                                                                                                                                             |     |    |     |

**X SIGNATURES****PUBLIC BODY APPROVAL:**

\_\_\_\_\_  
Lindsay Kislock  
Assistant Deputy Minister  
HSIMT  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Carolyn Bell  
Executive Lead  
BC Services Card Project  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Deb McGinnis  
Executive Director  
eHealth Privacy, Security and Legislation Office  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Stephanie Power  
A/ Executive Director  
Medical Services Branch  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Bev Hooper  
Chief Privacy Officer  
Health Insurance BC

\_\_\_\_\_  
Date

\_\_\_\_\_  
Kent Berger-North  
Chief Security Officer  
MAXIMUS BC

\_\_\_\_\_  
Date

\_\_\_\_\_  
Charmaine Lowe  
Executive Director  
Standards & Architecture  
Citizens Services

\_\_\_\_\_  
Date

GO TO: [PERSONAL INFORMATION DIRECTORY](#) (to add PIA and/or ISA summary)

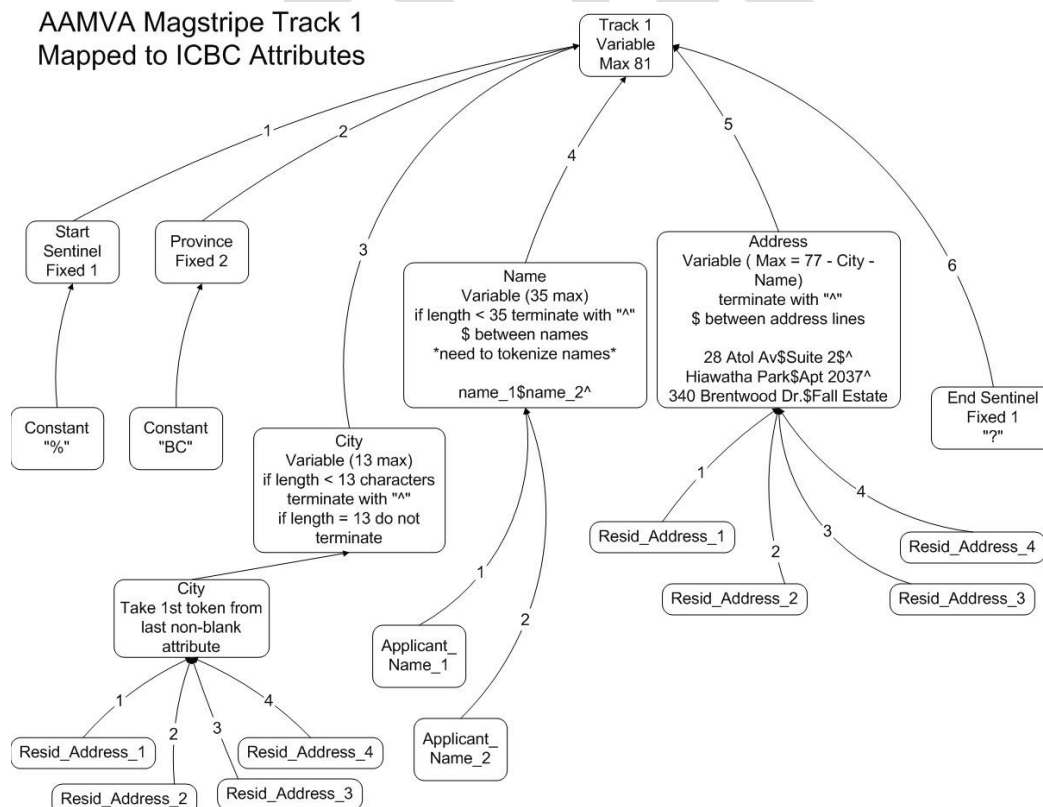
## APPENDIX A:

### COMBINED DRIVERS LICENCE/BC SERVICES CARD – PERSONALLY IDENTIFIABLE DATA

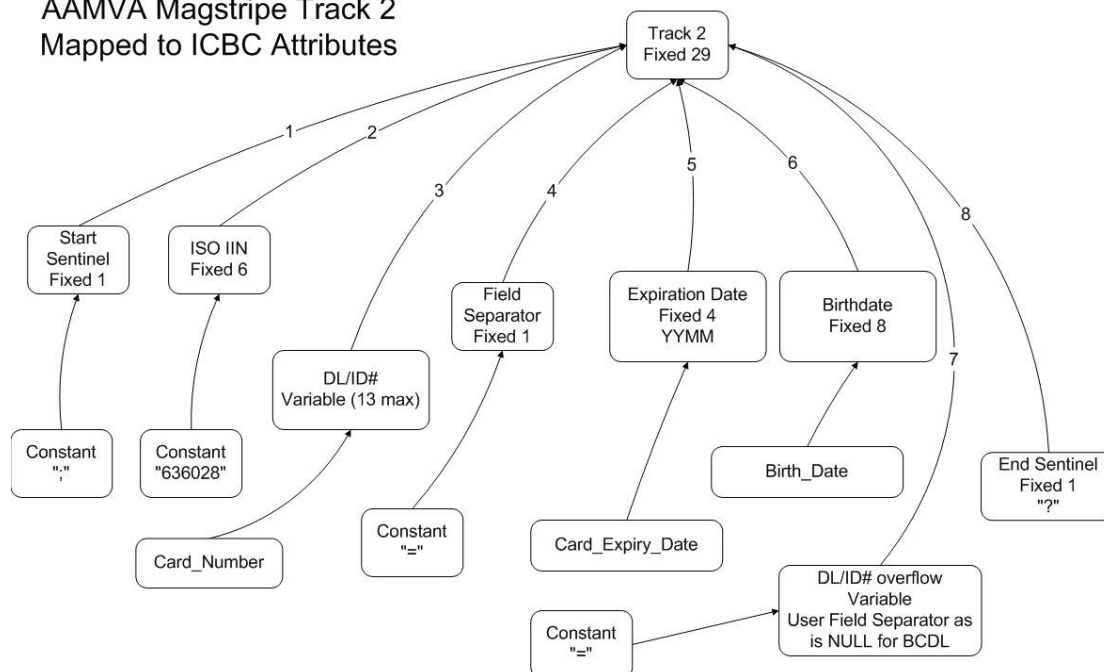
| Data Element           | Notes                         | Magstripe Track                                                            |
|------------------------|-------------------------------|----------------------------------------------------------------------------|
| Name                   | Surname, First name           | 1                                                                          |
| Address                | Residential address (4 lines) | 1                                                                          |
| City                   | Residential City              | 1                                                                          |
| Province               | Residential Province (inits)  | 1                                                                          |
| Drivers Licence Number |                               | 2                                                                          |
| Birthdate              |                               | 2                                                                          |
| Postal Code            | Residential Postal Code       | 3                                                                          |
| Gender                 |                               | 3                                                                          |
| Height                 |                               | 3                                                                          |
| Weight                 |                               | 3                                                                          |
| Eye Colour             |                               | 3                                                                          |
| Hair Colour            |                               | 3                                                                          |
| Personal Health Number |                               | Proposed addition to track 3 of magstripe (utilizing current ID# Fixed 10) |

### AAMVA Magnetic Stripe Data Format

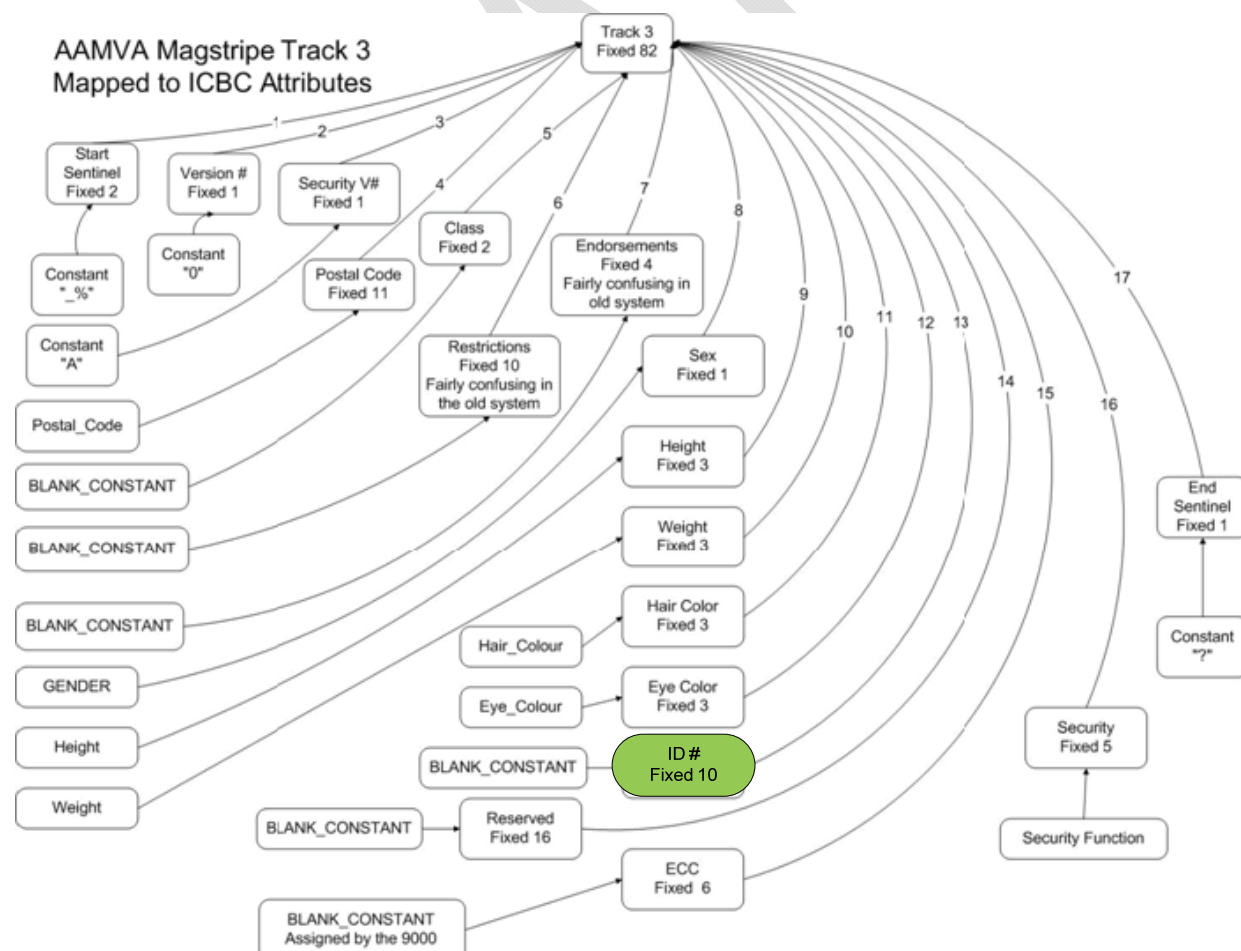
AAMVA Magstripe Track 1  
Mapped to ICBC Attributes



### AAMVA Magstripe Track 2 Mapped to ICBC Attributes



### AAMVA Magstripe Track 3 Mapped to ICBC Attributes



**From:** [Bill Jubran\(C\)](#)  
**To:** [Pearce, Alison HLTH:EX;](#)  
**cc:** [Thambirajah, Natasha HLTH:EX;](#) [Pamela Atkinson;](#) [Tanya Howes;](#)  
[Laura Smallwood\(C\);](#)  
**Subject:** RE: Disclosure  
**Date:** Monday, July 23, 2012 6:34:34 PM

---

Hi Alison,

The original disclosure wording that's on the forms included with the released Health Regulations is as follows:

- All personal information is collected under the authority of the *Medicare Protection Act*. The information is used to determine residency in B.C. and determine eligibility for provincial health care benefits. This information is protected from unauthorized use and disclosure in accordance with the *Freedom of Information and Protection of Privacy Act* and may be disclosed only as provided by that Act. If you have any questions about the collection, use and disclosure of this information, contact HIBC.

The new disclosure wording that will be included on new HIBC forms or documents requiring disclosure wording is as follows:

- All personal information is collected under the authority of the *Medicare Protection Act* and the *Freedom of Information and Protection of Privacy Act*. The information is used to determine residency in B.C. and determine eligibility for provincial health care benefits as well as for the issuance of the BC Services Card. This information is protected from unauthorized use and disclosure in accordance with the *Freedom of Information and Protection of Privacy Act* and may be disclosed only as provided by that Act. If you have any questions about the collection, use and disclosure of this information, contact HIBC.

I've highlighted the additional wording that was provided and approved by LCTZ.

Please let me know if you have any questions.

Regards,

---

Bill Jubran, Project Manager

722 Cormorant St. Victoria BC V8W 3Z1 | Office (250) 405-3713 | Cell S22  
S22 Fax (250) 405-3880

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---

**From:** Pearce, Alison HLTH:EX [mailto:Alison.Pearce@gov.bc.ca]  
**Sent:** Monday, July 23, 2012 8:03 AM  
**To:** Bill Jubran(C)  
**Cc:** Natasha Thambirajah  
**Subject:** Disclosure

Bill – Natasha and I are looking at the disclosure statement and the statement of purpose on the “Application for the BC Services Card” presented last week by Lisette.

You had suggested a disclosure statement – could you possibly forward that to me again?

Alison

**From:** [Rice, Colleen A CITZ:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX](#); [Sexsmith, Melissa M CITZ:EX](#); [Francis, Celia CITZ:EX](#);  
**Subject:** RE: FYI: WinZip Encryption  
**Date:** Monday, December 12, 2011 1:54:29 PM

---

Hello,

I thought that it might be useful to point out that there are policies and standards that relate to passwords and encryption. I believe that the policy responsibility would fall to information security branch, and probably would be housed in the information security policy. It might be worthwhile to pass on to ISB that we have been getting questions about this. There are a number of government policies/documents relating to passwords and encryption, below are a couple of examples.

[http://www.cio.gov.bc.ca/local/cio/informationsecurity/policy/summaries/8\\_encryption.pdf](http://www.cio.gov.bc.ca/local/cio/informationsecurity/policy/summaries/8_encryption.pdf)

### **7.3 Access Control – User responsibilities**

#### **7.3.1 Users must follow good security practices in the selection and use of passwords.**

- a) Selection of passwords**
- b) Password change**
- c) Privileged accounts**
- d) Protection and use of passwords**

<http://www.cio.gov.bc.ca/local/cio/informationsecurity/policy/isp.pdf>

## **IM/IT Architecture & Standards Manual STANDARD**

Office of the Chief Information Officer  
Province of British Columbia

Effective Date: 2006-08

Scheduled Review: Annual

Last Updated:

Last Reviewed: 2009-01

Type: Process Standard

**6.0 Information Technology Security (CPPM 12.3.6)**

**6.7 Password Standard**

[http://www.cio.gov.bc.ca/local/cio/standards/documents/standards/standards\\_manual.pdf#page=118](http://www.cio.gov.bc.ca/local/cio/standards/documents/standards/standards_manual.pdf#page=118)

Colleen  
250.356.1337

---

**From:** Thambirajah, Natasha LCTZ:EX  
**Sent:** Monday, December 12, 2011 1:29 PM  
**To:** Sexsmith, Melissa M CITZ:EX; Francis, Celia LCTZ:EX; Rice, Colleen A CITZ:EX  
**Subject:** RE: FYI: WinZip Encryption

Thanks, Melissa.

For interest, [here's](#) the WinZip site regarding encryption.

It might be useful to write up a policy/reference on how to encrypt files using WinZip (many ministries have this software), when to use it, the appropriate bit encryption to use (e.g. the difference between 128 and 256 bit), and appropriate mechanisms for setting passwords (e.g. the rules Melissa listed, the additional rules below, plus suggested sites like this one: <http://www.pctools.com/guides/password/> that offer the additional strength of randomly generated passwords).

“Strong passwords” refers to a password’s ability to resist guessing and brute-force attacks. They are still generally between 12 - 15 characters long (minimum length) and include the following traits in addition to the ones Melissa listed (some may seem quite obvious, but you’d be surprised):

- is not your name;
- is not your login;
- is not your friend’s name;
- is not your family member’s name;
- is randomly generated where possible (see the link above);
- is not the name of the project the document references;
- is not used for multiple sites or documents;
- is not a dictionary word;
- is not a common name.

Natasha

---

**From:** Sexsmith, Melissa M CITZ:EX  
**Sent:** Monday, December 12, 2011 12:52 PM  
**To:** Francis, Celia LCTZ:EX; Rice, Colleen A CITZ:EX; Thambirajah, Natasha LCTZ:EX  
**Subject:** FYI: WinZip Encryption

I’ve looked into the issue of using WinZip to encrypt files; according to [this blog](#), the encryption mechanism used by **recent** versions (version 9 and above) of the software is

secure, *if used properly*.

Proper use, in this case, means the user knows which encryption algorithm to select (AES-256), and uses a strong\* password.

**If the user does not follow these protocols, as I suspected, their data is subject to very fast and very effective cracking using a number of common attacks.**

\* “strong” means:

1. At least 12 characters in length (bear in mind the author is writing in 2008, so likely one needs even more characters than this [20?] today to be effective.)
2. Be random not contain any dictionary, common words or names
3. At least one Upper Case Character
4. Have at least one Lower Case Character
5. Have at least one Numeric Character
6. Have at least one Special Character e.g. \$,£,\*,%,&,!

Melissa

**From:** [Keay, Liz HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** RE: MV2645\_ICBC edits Sept 4\_Partner Accepted.docx  
**Date:** Thursday, October 4, 2012 6:12:46 PM

---

Thanks!

Elizabeth Keay

Sr Policy Analyst | Information Privacy & Legislation | Health Information Privacy,  
Security & Legislation Branch | Ministry of Health

3<sup>rd</sup> Floor – 1483 Douglas St | Victoria BC V8W 3K4

email: [liz.keay@gov.bc.ca](mailto:liz.keay@gov.bc.ca) | ph: 250-387-1290 | fax:250-356-2530

---

**From:** Thambirajah, Natasha HLTH:EX  
**Sent:** Thursday, October 4, 2012 4:48 PM  
**To:** Keay, Liz HLTH:EX  
**Subject:** RE: MV2645\_ICBC edits Sept 4\_Partner Accepted.docx

This is only for a combo card.

The other one is for the standalone photo card.

N

---

**From:** Keay, Liz HLTH:EX  
**Sent:** Thursday, October 4, 2012 4:08 PM  
**To:** Thambirajah, Natasha HLTH:EX  
**Subject:** RE: MV2645\_ICBC edits Sept 4\_Partner Accepted.docx

Thanks Natasha, are these for the photo cards or only Combo or?

Elizabeth Keay

Sr Policy Analyst | Information Privacy & Legislation | Health Information Privacy,

Security & Legislation Branch | Ministry of Health

3<sup>rd</sup> Floor – 1483 Douglas St | Victoria BC V8W 3K4

email: [liz.keay@gov.bc.ca](mailto:liz.keay@gov.bc.ca) | ph: 250-387-1290 | fax:250-356-2530

---

**From:** Thambirajah, Natasha HLTH:EX  
**Sent:** Thursday, October 4, 2012 2:33 PM  
**To:** Keay, Liz HLTH:EX  
**Subject:** MV2645\_ICBC edits Sept 4\_Partner Accepted.docx

<< File: MV2645\_MoH Sept 4 2012.docx >> << File: MV2645\_ICBC edits Sept 4\_Partner Accepted.docx >>

Partner approved version gets printed for implementation. Other version is what we'll move to post-implementation (with changes to the titles to "Interim BC Driver's Licence and Services Card"

**From:** [Basi, Kash FIN:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** RE: PIA you wrote a while back for IDIM/BCSC  
**Date:** Wednesday, February 1, 2012 10:26:10 AM  
**Attachments:** [IDIM conceptual pia November 28 2011.doc](#)  
[image001.png](#)

---

Here it is

---

**From:** Thambirajah, Natasha LCTZ:EX  
**Sent:** Wednesday, February 1, 2012 9:58 AM  
**To:** Basi, Kash CITZ:EX  
**Subject:** PIA you wrote a while back for IDIM/BCSC

Hi Kash –

Could you send me an electronic copy of the PIA you wrote a while ago on the IDIM/BCSC bit for Charmaine? I thought I had a copy but I can't seem to find it ☹

N

---

**Natasha A. Thambirajah**  
Senior Legislative and Policy Advisor  
Office of the Chief Information Officer  
Ministry of Labour, Citizens' Services and Open Government  
T: (250) 387-1992 | F: (250) 356-1182

 Please consider the environment before printing this email

## PRIVACY IMPACT ASSESSMENT

### I BASIC INFORMATION – BC SERVICES CARD – CONCEPTUAL DESIGN

#### 1. Ministry/Public Body and Program Area.

|                |                                                                       |
|----------------|-----------------------------------------------------------------------|
| Ministry       | Ministry of Health                                                    |
| Division       | Health Sector Information Management & Technology Services (HSIMT)    |
| Branch/Section | Business Management Office (BMO) / Health Insurance BC (HIBC)/MAXIMUS |
| Program        | BC Services Card – Transforming the BC CareCard                       |

#### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

|                |                                                     |
|----------------|-----------------------------------------------------|
| Name, Title    | Derek Laine Farrell, Transformation Project Manager |
| Branch/Section | Business Management Office                          |
| Phone Number   | 250-952-6121                                        |
| E-Mail         | Derek.LaineFarrell@gov.bc.ca                        |

#### 3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

In preparation and the follow on production of this PIA, the following questions were provided by the Privacy Branch to guide what information needed to be included in the assessment:

|                                                                   |                                                                   |
|-------------------------------------------------------------------|-------------------------------------------------------------------|
| • Does the proposal / project deal with P.I.?                     | Yes.                                                              |
| • Is there an existing PIA?                                       | Yes. A Conceptual PIA was produced in February 2011 for the OIPC. |
| • Is there a change to the collection, use or disclosure of P.I.? | Yes                                                               |
| • Are there any security aspects involved?                        | Yes                                                               |

#### BACKGROUND

The BC Medical Services Plan (MSP) was enacted in 1965 under the legislation contained in the Medicare Protection Act. In 2005, MOHS entered into an alternative services delivery contract with Health Insurance BC (HIBC) /MAXIMUS BC. The responsibility for the Medical Services Plan Claims System (MSP) transitioned from the Ministry of Health (MOH) to HIBC in April 2005. All current and future related policy / legislative changes remained within the Medical Services Division at MOHS.

On June 2, 2011 amendments were made to the Medicare Protection Act to enable the ministry to transform the current CareCard program and systems to do the following:



### 3.1 WHAT:

The BC Services Card Project is a joint initiative between the Ministries of Health (MOH), Citizens' Services (CITZ), Public Safety and Solicitor General (PSSG) and the Insurance Corporation of BC (ICBC). The project will leverage existing government systems and business processes including ICBC driver's licence technology, front counter services and identity management processes in addition to Health's Medical Services Plan (MSP) administration. The scope of this PIA covers the Medical Services Plan (MSP) changes that were made under amendments to the Medicare Protection Act in June 2011 to support the BC Services Card by Ministry of Health and its ASD provider, HIBC/MAXIMUS BC.

As each of the delivery partners operate under different legislation, separate PIAs will be provided for the project from:

- PSSG / ICBC
- Vital Statistics Agency (CGI under contract)

It is also planned for MOH to provide further PIAs for the project as follows:

- Detailed Design complete - April/May 2012
- Implementation - December 2012

#### ***Project Context:***

This project has been established and funded by the MoH to re-enrol all British Columbians in the MSP and to re-enrol all adults every five years thereafter. Successful enrolment and re-enrolment will result in the issuance of a new BC Services Card. The program will be developed during 2012 with roll-out commencing November 2012 and completing in 2017.

The project will be focused on establishing the services necessary to rollout the new Services Card by the two delivery partners, namely HIBC and ICBC, due to the tight timelines and the significant level of change that is required to accommodate the objectives of the MoH to provide high quality service to citizens for MSP and Identification (BC Drivers Licence & BCID Cards).

A parallel and related stream to this, Ministry of Labour, Citizens' Services and Open Government is establishing corporate identity infrastructure that will be used in the future.

The business benefits that will be realized with the completion of BC Services Card will have a direct positive impact on the residents of British Columbia. These benefits will include:

- The distribution of approximately 1.9 million BC Services Cards with a smart card chip within the first year of card production,
- The establishment of MSP expiry and re-enrolment cycles,
- The establishment of level-3 MSP identify proofing for BC citizens and for those over 19 who present themselves at the DLO point of service, and
- The introduction of chip enabled cards and standards that will allow BC citizens to access a broader array of services through the use of the BC Services Card in the near future.

These benefits will help to reduce MSP fraud as well as set the stage for improved access to BC government services for the citizens of British Columbia.

### 3.2 WHO:

A Deputy Ministers' Project Board, chaired by Health, is collaborating to ensure the delivery of the BC Services Card to the BC public will be a success. During the project planning phase, core services provided by the key ministry partners were identified. The collaborative model proposes leveraging these core services to reduce costs and avoid duplication:

- Ministry of Health through HIBC – MSP administration and call centre;
- PSSG (ICBC) - front counter services, identity management and card production; and,
- Ministry of Citizens Services – enhancement of existing identity services and front counter delivery through Service BC.

See project governance structure at **APPENDIX A** for details of the structure for managing the project outcomes, budget and scope.

BC Services Card Project working groups are addressing the privacy and security protections for information flows between the three key partners identified above. They will focus on the data transmitted between ICBC and HIBC and MOH. The separation of roles among the three key partners has been designed to ensure the highest level of privacy protections for individuals.

See **APPENDIX B** for more details of the Core Services to be performed by each partner.

The list of key stakeholders that have an interest in the project and the delivery of the BC Services Card to the residents of BC include:

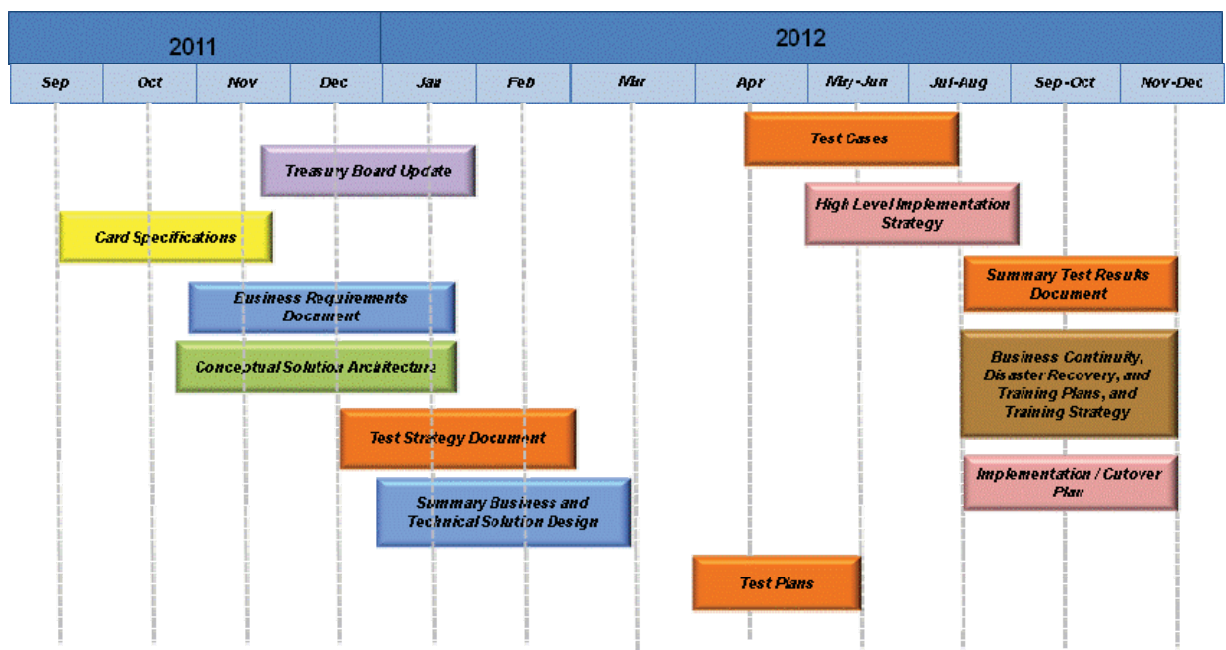
| <b>Stakeholder Groups</b>                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Initiative Leaders</b>                                                                                                                                                                                                                                                                                   |
| Ministry of Health (MOH)                                                                                                                                                                                                                                                                                    |
| Ministry of Citizens' Services (LCTZ)                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>• Shared Services BC</li> <li>• Service BC</li> <li>• OCIO</li> </ul>                                                                                                                                                                                                |
| Public Safety and Solicitor General (PSSG)                                                                                                                                                                                                                                                                  |
| Insurance Corporation of BC (ICBC)                                                                                                                                                                                                                                                                          |
| MAXIMUS BC                                                                                                                                                                                                                                                                                                  |
| Health Insurance BC (HIBC)                                                                                                                                                                                                                                                                                  |
| <b>Other Key Stakeholders</b>                                                                                                                                                                                                                                                                               |
| Office of the Information Privacy Commissioner                                                                                                                                                                                                                                                              |
| Ministry of Finance, Revenue Services of BC                                                                                                                                                                                                                                                                 |
| Government Communications & Public Engagement                                                                                                                                                                                                                                                               |
| Government Agents                                                                                                                                                                                                                                                                                           |
| Other ministries and Agencies                                                                                                                                                                                                                                                                               |
| <ul style="list-style-type: none"> <li>• Ministry of Housing and Social Development (and its third-party service providers)</li> <li>• Ministry of Children and Family Development</li> <li>• Ministry of Healthy Living and Sport</li> <li>• Vital Statistics Agency (and its service provider)</li> </ul> |
| Health Authorities                                                                                                                                                                                                                                                                                          |
| College of Physicians and Surgeons of BC                                                                                                                                                                                                                                                                    |
| Health Care Providers/ Organizations                                                                                                                                                                                                                                                                        |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• BC Medical Association</li> <li>• College of Pharmacists</li> <li>• Health Canada</li> <li>• Mental Health Service Centers (MHSCs)</li> <li>• Medical Office Assistants' Association of British Columbia</li> <li>• Individual providers – doctors, pharmacists, MOAs, surgeons, pharmacies, etc.</li> <li>• Supplementary health care providers (e.g. Chiropractors and naturopaths)</li> <li>• Long term and continuing care providers</li> </ul> |
| Low-income and homelessness advocacy and outreach groups                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Seniors advocacy groups                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| MSP Group plan administrators                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| The public                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

### 3.3 WHEN:

The following graphic describes the project's phased development approach for the new BC Services Card program. Each phase will provide the follow on phase(s) with a foundation to proceed until cutover is achieved in November 2012. Upon acceptance of the final phases, the first BC Services Cards will be available for deployment to British Columbians.

## BCSCP Plan / Schedule



### 3.4 WHERE:

The primary jurisdiction for the BC Services Card is the Province of BC where it will be used to access Health Care services and in the near future, government wide services.

However, as is the case with the current BC Drivers Licenses, the BC Services card will be used in other parts of Canada and internationally to gain access to medical services provided by physicians. On presentation of a valid card, the physicians will bill their own medical services plan and the provinces / territories will recover the funding between them. The use of the card is covered for medical services under Reciprocal Billing Agreements with the provinces and territories in Canada (except Quebec). When travelling in Quebec or outside of Canada, the card may be used to provide information to the physician but the costs will be paid by the patient at the point of service and claimed by the traveller on return to BC, either through travel insurance or a MSP out of country claim.

## 4. Purpose/Objectives of the initiative (if statutory, provide citation).

### WHY:

#### ***Public Sector:***

The Deputy Ministers' Committee on Transformation and Technology (DMCTT) has been created to respond to both demographic challenges and demands for improved and efficient service delivery. Government must leverage technology solutions and innovation to transform the way it does business to meet these challenges.

The committee is responsible for developing the BC Public Service's Gov 2.0 strategy - the strategic vision and direction for how technology and infrastructure is used over time to support government's transformation agenda and citizen expectations for e-services. The defining principles of Gov 2.0, which guide much of the committee's work, are the following:

- We will empower citizens to create value from open government data.
- We will strive to save citizens' time in their interaction with government and make it easier to access better quality services.
- We will encourage collaboration in the public service because it is integral to delivering quality service to citizens.

The cornerstone of this strategy is a high assurance credential that would be used to access government e-services, while ensuring client privacy and safety.

**Health Sector:**

Owing to current practices, the number of CareCards potentially in circulation is significantly greater than the number of current MSP beneficiaries, creating a potential for CareCard misuse or fraud. Except for limited cases, the current CareCard does not carry an expiry date. Also, although designed as a tool for accessing health services, the CareCard has gained wider use as a government issued identity credential. As the CareCard can be easily obtained, it is an accessible vehicle for identity theft and can be used as a supporting document to fraudulently obtain higher level identity documents such as a Canadian passport.

Government spending in the Ministry of Health in 2009/10 reached \$13.92 billion, an increase of 61 percent from \$8.65 billion in 2000/01. The scale and rate of escalation in health service costs calls for assurance that provincial spending is applied only to eligible persons. It is not possible to calculate the extent of CareCard misuse or fraud. The Ministry of Health conducts limited investigations related to the reported misuse of CareCards by non-eligible persons, but this does not cover the full extent of potential misuse or fraudulent activity.

The Canadian Health Care Anti-fraud Association estimates that from 2 to 10 percent of every health care dollar in North America is lost to fraud (source: [www.chcaa.org](http://www.chcaa.org)). This indicates potential BC health care fraud costs of between \$260 million and \$1.3 billion each year. These statistics represent the broad spectrum of possible categories of health care fraud, including provider fraud, and not just to misuse of CareCards.

Apart from the potential for identity theft and fraud, misuse of the CareCard has important ramifications for patient safety. The sharing of CareCards, whether through deliberate misuse or ignorance, can result in confusing and potentially life-threatening errors in paper and electronic health records, including pharmacies where drug interactions can cause serious health issues and even death.

The future of the CareCard can be harmonized with government's broader need for providing secure access to services and information, both online and offline, and for enabling service integration across sectors and program boundaries. The lack of a trusted means for confirming identity and eligibility is a roadblock confronting every sector of the government that directly provides programs services to clients. Another key issue is government's ability to protect citizens' personal information, including their health records. Any plan for something new must be done in a way that enhances and does not erode privacy protections.

## 5. What are the potential impacts of this proposal? (Include privacy impacts in this description).

### **Health Care Providers and Points of Service:**

In order for public service providers to provide services, including health care, to the correct individual and to ensure the high assurance of BC Services Card, a balance is required between access and privacy. Accordingly, the BC Services Card will adhere to the **need to know** and **least privilege** access principles to minimize privacy impacts, as defined in the BC Government's *Core Policy and Procedure Manual*:

- **Need to Know:** A privacy principle where access is restricted to authorized individuals whose duties require such access. Individuals are not entitled to access merely because of status, rank or office. This will be the governing principle of this initiative: its purpose is to minimise privacy breaches as much as possible.
- **Least Privilege:** A security principle requiring that each subject in a system be granted the most restrictive set of privileges (or lowest clearance) needed for the performance of

authorized tasks. The application of this principle limits the damage that can result from accident, error or unauthorized use.

**Broader Public Sector:**

There will be many impacts to the way government delivers its services to the public over time. The proposed implementation of the BC Services Card over a five year schedule will meet many of the GOV 2.0 principles. This transition will affect the stakeholders involved in areas such as: culture, policy, business, operation, systems, interfaces, procedures, service providers and better protection of privacy.

During the deployment of the project starting in November 2012, there will be old CareCards and new BC Service Cards in circulation. The introduction of the BC Service Card will require detailed planning and communication at front counters, with other provinces and territories, stakeholders within the Province who currently use the CareCard (e.g. BC Ferries), points of service, health care providers and to all stakeholder ministries in the Province. A policy framework that includes, but is not limited to, describing technological and infrastructure changes is being developed and will continue to be refined over the coming months.

**Citizens:**

Starting November 2012, the proposed BC Services Card model will generally require existing Medical Service Plan (MSP) beneficiaries (approximately 99 percent of the province's population) to re-enrol in the MSP every five years to maintain their active coverage status. Children, as defined by the *Infant's Act* will be exempted from re-enrolment. In order to re-enrol, individuals will have to confirm their identity, MSP Eligibility and residential address as required in order to receive a new BC Services Card once their original BC Services Card expires. While eligible individuals would never be refused health services, presenting an expired BC Services Card could result in an individual paying for the service up front, and submitting a claim application to MSP later to recover costs once re-enrolment is completed.

**Technology:**

The BC Services Card will enhance the privacy and security of information through the use of modern technology and best practices. The system is being designed with information privacy features such as:

- Contactless chip technology that carries no personal information;
- Authentication of card users at points of service and, in the future, for remote access; and,
- Cryptographic security capabilities.

British Columbia's plan for using secure chip card technology will include careful consideration for security and privacy implications. **APPENDIX C** has a generic information flow diagram showing the creation of an individual BC Services Card and some of the privacy and security aspects that need to be considered in detail. BC will not use chip technology to store a person's identity or personal information. BC's plans for using secure chip technology call for it to be used only as a secure cryptographic device for the cardholder. To work, the genuine card must be present, must be used in conjunction with a genuine reader and, where appropriate, with a passcode (PIN) that will only be known by the cardholder. Attempts to "read" the chip in the card will not provide information about the

person, because none is stored on the chip in the first place. A generic information flow diagram for this process and some of the privacy and security aspects that need to be considered in detail is shown in **APPENDIX D**

Although many details need to be determined, it is expected that drivers licence service counters (ICBC, Service BC and Appointed Agents) will collect the BC resident's identity information as a service provider on behalf of MOH and LCTZ. Use of this identity information to access government services will be enabled in the future by the LCTZ Identity Assurance Service (IAS) including a system of anonymous program identifiers for each participating government program. For example, the MSP program will store a "Directed Identifier" (or "DID" - an anonymous identifier linked to the PHN) for each MSP client in the IAS. Only the MSP program will be able to translate its anonymous identifier back to the corresponding PHN. This will also be the case for any and all participating programs. Indeed, the central IAS does not "know" the program identifiers for the programs in which an individual is participating. This will ensure that data linkage within and across ministries will not be possible without explicit cooperation, data-sharing agreements and requisite legal authorities. This is an important privacy enhancement.

LCTZ will need to consider the delegation of authority to ICBC and MOH to collect Identity information on behalf of LCTZ for photo and non-photo card clients respectively. The separation of stakeholder roles into collection, identity confirmation, and program users is an important privacy protection.



**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

A conceptual PIA was produced in February 2011 for the OIPC.

Individual PIA's will be completed by each partner organization in tandem with this PIA and additionally in the Design and Implementation phases for the project.

**IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO [X. SIGNATURES](#).**

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have altered the definition of personal information from "recorded information about an identifiable individual" to "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted. The amendments also generally alter the definition of public body employee to include a volunteer, and extend a public body's responsibilities under Part 3 of the Act to its employees, officers and directors and to its service providers and their employees, associates or affiliates.

## **II DESCRIPTIVE INFORMATION**

**1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the amended definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

Every eligible British Columbian will be issued a new BC Services Card which will contain personal information about them in both written form and on the existing magnetic stripe (but not on the chip). Depending on the type of card issued, there will be more personal data elements on the card compared to the current Care Card. For example, the combined BC services Card and Driver's Licence will contain the Personal Health Number (PHN) and person's Name, Birth Date, Gender, Address, Height, Weight, Hair Colour and Eye Colour.

A complete list of personally identifiable data elements is attached at **Appendix E**. The list is broken down into separate transactions as the data elements will differ with the type of service being employed.

**2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

The diagram in **APPENDIX D** illustrates how limited personal information is proposed to flow between the project-partners to facilitate production of a BC Services Card (with photo) for a typical BC client. The data will be transmitted online over secure communication lines from ICBC to Health and back to confirm that the client's PHN is valid and is eligible for MSP. The client may then be enrolled (or re-enrolled) in MSP. Once confirmed, Card Management Services will register the person's information and send a request through secure connections to the service provider who manages the current Card Production under contract to ICBC. The service provider will produce the card and mail it to the client following the current Driver's Licence and BCID processes.

The processes will involve direct communication between the three lead organizations as follows:



| FROM                            | TO                            | ACTION                                     |
|---------------------------------|-------------------------------|--------------------------------------------|
| Client →                        | Presents at ICBC counter      | Request Photo Card                         |
| ICBC counter →                  | MAXIMUS BC-MSP Enrolment:     | Request Confirm PHN/client MSP eligibility |
| MAXIMUS BC-MSP Enrolment →      | ICBC counter:                 | Confirm PHN / MSP eligibility              |
| MAXIMUS BC →                    | ICBC Card Management Services | Release or Reject Card request             |
| ICBC Card Management Services → | Service Provider              | Produce Card                               |
| ICBC Service Provider →         | Client                        | Mail Card                                  |

In addition to this process, there will be separate processes for new BC residents who must first identity-proof themselves prior to the card request and enrolment in MSP. This would also trigger a request for enrolment in MSP to MAXIMUS BC.

**III PERSONAL INFORMATION COLLECTION**(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPPA Act")

|                                          | Yes | No | n/a |
|------------------------------------------|-----|----|-----|
| Is personal information being collected? | x   |    |     |

Only personal information that is required to issue the BC Services Card will be collected from the client. The information that will be collected, used or disclosed to enable use of the BC Services Card is detailed in **APPENDIX E**.

**IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)**

**1) Authorization for Collection:**

No personal information may be collected by or for a public body unless authorized under the FOIPPA Act (as covered by numbers i, ii, or iii below).

|      |                                                                                                                          | Yes | No | n/a |
|------|--------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Has the collection of personal information been specifically authorized by, or under, an Act, other than the FOIPPA Act? | x   |    |     |
|      | <b>If yes, please specify the name of the Act and relevant section</b><br>Medicare Protection Act (Need section)         |     |    |     |
| ii.  | Has the personal information been collected for law enforcement purposes?                                                |     | x  |     |
| iii. | Is the personal information directly related to, and necessary for, an operating program or activity of the public body? | x   |    |     |

**If none of the above questions has been answered "yes", your office does not have the authority under the FOIPPA Act to collect the personal information in question. Please contact your Director/Manager of Information and Privacy (DMIP) for ministries or the position responsible for FOI and Privacy Coordination (FOIPPA Coordinator).**

**2) How will the personal information be collected?**

A public body must collect personal information or cause personal information to be collected directly from the individual the information is about, with certain specific exceptions.

|                                                                                                               | Yes | No | n/a |
|---------------------------------------------------------------------------------------------------------------|-----|----|-----|
| Will the personal information be collected <u>directly</u> from the individual that the information is about? | x   |    |     |

**IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO [3. NOTIFICATION TO COLLECT INFORMATION](#).**

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

**III PERSONAL INFORMATION COLLECTION cont'd**

|                                                                                   |                                                                                                                                                                            | Yes | No | n/a |
|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.                                                                                | Did the individual the information is about authorize another method of collection?                                                                                        |     | x  |     |
| ii.                                                                               | Has indirect collection been authorized by the Information and Privacy Commissioner?                                                                                       |     |    | x   |
| iii.                                                                              | Has indirect collection been authorized by another enactment?                                                                                                              |     |    | x   |
| <b>If yes, please specify the name of the Act and relevant section(s)</b>         |                                                                                                                                                                            |     |    |     |
| iv.                                                                               | Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?          |     | x  |     |
| v.                                                                                | Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?   |     | x  |     |
| vi.                                                                               | Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary? |     | x  |     |
| vii.                                                                              | Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?                                       |     | x  |     |
| viii.                                                                             | Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?                                                              | x   |    |     |
| ix.                                                                               | Is the personal information being collected for the purpose of law enforcement?                                                                                            |     | x  |     |
| x.*                                                                               | Is the public body collecting personal information disclosed to it under section 33, section 33.1, section 33.2, section 34, section 35, or section 36 of the FOIPP Act?   | x   |    |     |
| <b>Specify relevant section(s) or subsections that apply.</b><br>Need sections    |                                                                                                                                                                            |     |    |     |
| <b>Additional details as required (e.g., explanation of method of collection)</b> |                                                                                                                                                                            |     |    |     |

***If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your DMIP or FOIPP Coordinator.***

**3) Notification to collect information**

***A public body must ensure that an individual from whom it collects personal information or causes personal information to be collected is notified of the collection as outlined below.***

**III PERSONAL INFORMATION COLLECTION cont'd**

|           |                                                                                              | Yes | No | n/a |
|-----------|----------------------------------------------------------------------------------------------|-----|----|-----|
| <b>i.</b> | Has the individual whose personal information is being collected, been informed of:          |     |    |     |
|           | (a) the purpose for collection?                                                              | x   |    |     |
|           | (b) the legal authority for collection?                                                      | x   |    |     |
|           | (c) the contact information of the person who can answer questions regarding the collection? | x   |    |     |

**Notification is not required if the answer is “yes” to any of the following:**

|             |                                                                                                                                | Yes | No | n/a |
|-------------|--------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| <b>ii.</b>  | Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?  |     |    | x   |
| <b>iii.</b> | Has the Minister responsible for the FOIPP Act excused your public body from complying because it would                        |     |    |     |
|             | (a) result in the collection of inaccurate information?                                                                        |     |    | x   |
|             | <b>or</b>                                                                                                                      |     |    |     |
|             | (b) defeat the purpose or prejudice the use for which the personal information is collected?                                   |     |    | x   |
| <b>iv.</b>  | The information                                                                                                                |     |    |     |
|             | (a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, <b>and</b> |     |    | x   |
|             | (b) is not collected directly from the individual the information is about                                                     |     |    |     |
|             | <b>Additional details as required (e.g., method of notification)</b>                                                           |     |    |     |

***If you have not provided the required notification as outlined above, please contact your DMIP or FOIPP Coordinator.***

#### IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

|                                     | Yes | No | n/a |
|-------------------------------------|-----|----|-----|
| Is personal information being used? | x   |    |     |

Only personal information that is required to issue the BC Services Card and operate the Identity Assurance Service (IAS) will be used by the system. IAS use is Client controlled and will be triggered only by the Client as a service to establish identity and eligibility for Government services.

#### IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO V. DISCLOSURE OF PERSONAL INFORMATION

***Under the FOIPP Act, a public body must ensure that personal information in its custody or under its control is only used for certain specified purposes as outlined below.***

The public body **must** check one or more of the authorities listed below:

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Yes | No | n/a |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1.   | Has the individual the personal information is about consented to the use?<br>(Note: Supporting documentation must be on file.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | x   |    |     |
| 2.   | Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | x   |    |     |
|      | <p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>The personal information is required to enrol or re-enrol each eligible British Columbian in the Medical Services Plan so that the costs of the medical services they receive are covered under the plan. The BC Services Card will provide medical service providers with strong assurance that the person receiving the service is eligible.</p> <p>The secondary use of the personal information is to enable the medical service providers to bill the Ministry of Health for their services for each eligible patient and keep health records for reference in further encounters. The personal information for some British Columbians may be used in other health related programs upon the patients application for these services. E.g. Premium Assistance</p> |     |    |     |
| 3. * | If the personal information was disclosed to the public body under section 33, section 33.1, section 33.2, section 34, section 35 or section 36, is the information being used for that same purpose?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |     |    | x   |
|      | <b>Specify subsection(s) being applied</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |     |    |     |

***If you have not checked one of the above, you do not have the authority to use the information. Please contact your DMIP or FOIPP Coordinator.***

## V DISCLOSURE OF PERSONAL INFORMATION

(Section 33, section 33.1, section 33.2, section 34, section 35 and section 36 of the FOIPP Act)

|                                          | Yes | No | n/a |
|------------------------------------------|-----|----|-----|
| Is personal information being disclosed? | x   |    |     |

Only personal information that is authorized under the Medicare Protection Act will be disclosed. Each program area will need to ensure that they only disclose information that they are authorized under the FOIPP Act to disclose. The personal information will only be used by those individuals in the programs areas with a need to know and have authorization from the card holder.

### IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION.

*A public body must ensure that personal information in its custody or under its control is disclosed only as permitted under sections 33, 33.1, 33.2, 34, 35, and 36 of the FOIPP Act.*

#### 1) Disclosure of Personal Information

Sections 33, 33.1 and 33.2 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please check the main authorization(s) for disclosure below.

**(Note that the numbering is taken from sections 33.1 and 33.2 of the FOIPP Act.)**

| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                                       | Yes | No | n/a |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (1)(a)   | In accordance with Part 2                                                                                                                                                                                                                 |     |    | x   |
| (1)(a.1) | If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):<br><br>22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if              |     |    |     |
|          | (e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,                                                               |     |    | x   |
|          | (f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,                                                                                                                        |     |    | x   |
|          | (h) the information is about expenses incurred by the third party while travelling at the expense of a public body,                                                                                                                       |     |    | x   |
|          | (i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or |     |    | x   |

| s. 33.1  | Disclosure inside OR outside Canada                                                                                                                                                                                                                                          | Yes | No | n/a |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|          | (j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c). |     |    | x   |
| (1)(b)   | If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable<br>(Note: Supporting documentation must be on file)                                             |     |    | x   |
| (1)(c)   | In accordance with an enactment of British Columbia or Canada that authorizes or requires its disclosure                                                                                                                                                                     | x   |    |     |
|          | <b>Specify name of enactment and relevant section(s)</b>                                                                                                                                                                                                                     |     |    |     |
|          | <b>Medicare Protection Act - Section 5 (6)</b>                                                                                                                                                                                                                               |     |    |     |
| (1)(c.1) | If the personal information is made available to the public in British Columbia under an enactment, other than the <i>Freedom of Information and Protection of Privacy Act</i> , that authorizes or requires the information to be made public                               |     |    | x   |
|          | <b>Specify name of enactment and relevant section(s)</b>                                                                                                                                                                                                                     |     |    |     |
| (1)(d)   | In accordance with a provision of a treaty, arrangement or written agreement that<br>(i) authorizes or requires its disclosure, and<br>(ii) is made under an enactment of British Columbia or Canada                                                                         |     |    | x   |
| (1)(e)   | To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if<br>(i) the information is necessary for the performance of the duties of the minister, officer or employee,                            |     | x  |     |
|          | <b>and</b><br>(ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada                                                                                                             |     | x  |     |
|          | <b>If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>                                                                                                                              |     |    |     |
| (1)(e.1) | To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if<br>(i) the information is necessary for the performance of the duties of the individual in relation to the public body,                            |     | x  |     |

| s. 33.1 | Disclosure inside OR outside Canada                                                                                                                                                                                                                                                                | Yes | No | n/a |
|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
|         | <b>and</b><br>(ii) in relation to disclosure outside Canada,<br>(A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and<br>(B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada |     | x  |     |
|         | <b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>                                                                                                                                                  |     |    |     |

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

| s. 33.1 | Disclosure inside OR outside Canada                                                                                                                                                         | Yes | No | n/a |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (1)(f)  | To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister |     | x  |     |
| (1)(g)  | To the Attorney General or legal counsel for the public body, for use in civil proceedings involving the government or public body                                                          |     | x  |     |
| (1)(h)  | To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act                                                    |     | x  |     |
| (1)(i)  | If                                                                                                                                                                                          |     |    |     |
|         | (i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by                                                                |     |    |     |
|         | a. an individual, or                                                                                                                                                                        | x   |    |     |
|         | b. corporation of which the individual the information is about is or was a director or officer,                                                                                            |     | x  |     |
|         | <b>and</b>                                                                                                                                                                                  |     |    |     |
|         | (ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that                                                                                              |     |    |     |
|         | a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or                                                                                    |     | x  |     |
|         | b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction                                                                         |     | x  |     |
| 1(i.1)  | For the purposes of                                                                                                                                                                         |     |    |     |
|         | (i) a payment to be made to or by the government of British Columbia or a public body,                                                                                                      | x   |    |     |
|         | (ii) authorizing, administering, processing, verifying or cancelling such a payment, or                                                                                                     | x   |    |     |



|        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |   |        |  |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--------|--|
|        | (iii) resolving an issue regarding such a payment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | x |        |  |
| (1)(j) | In the case of the Insurance Corporation of British Columbia, if<br>(i) the information was obtained or compiled by that public body for purposes of insurance provided by the public body, and<br>(ii) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim                                                                                                                                                                                                                                       |   | x<br>x |  |
| (1)(k) | For the purposes of<br>(i) licensing or registration of motor vehicles or drivers, or<br>(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences                                                                                                                                                                                                                                                                                                                                                                |   | x<br>x |  |
| (1)(l) | For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations                                                                                                                                                                                                                                                                                                                                                                 |   | x      |  |
| (1)(m) | If<br>(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and<br>(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety                                                                                                                                                                                              |   | x<br>x |  |
| (1)(n) | So that the next of kin or a friend of an injured, ill or deceased individual may be contacted                                                                                                                                                                                                                                                                                                                                                                                                                                                       |   | x      |  |
| (1)(o) | In accordance with section 36 (disclosure for archival or historical purposes)                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |   | x      |  |
| (1)(p) | The disclosure<br>(i) is necessary for<br>(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or<br>(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body |   | x<br>x |  |
|        | <b>and</b><br>(ii) in the case of disclosure outside Canada<br>(A) is limited to temporary access and storage for the minimum time necessary for that purpose, and<br>(B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred                                                                                                                                                                                                                                        |   | x<br>x |  |
|        | <b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                 |   |        |  |

**V DISCLOSURE OF PERSONAL INFORMATION cont'd**

| <b>s. 33.1</b> | <b>Disclosure inside OR outside Canada</b>                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Yes</b> | <b>No</b> | <b>n/a</b> |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|------------|
| <b>(2)</b>     | In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33                                                                                                                                                                                                                                                             |            |           |            |
| <b>(2)(a)</b>  | to another law enforcement agency in Canada                                                                                                                                                                                                                                                                                                                                                                                                                    | x          |           |            |
| <b>(2)(b)</b>  | to a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.                                                                                                                                                                                                                                                                                                          |            | x         |            |
| <b>(3)</b>     | The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.                                                                                                                                                                                                          |            | x         |            |
|                | <b>Additional details as required</b><br><br><b>(2)(a) – Residents who are enrolled in the Medical services Plan may have their personal information disclosed to the Ministry of Attorney General in accordance with the Family Maintenance Enforcement Act (Section 8), Family Relations Act (Sections 39, 98, 99 and 100), and FOI Act (Sections 33(d) and 33(n)) for the purpose of locating missing partners sought in regards to family law matters.</b> |            |           |            |

*If you have not checked any of the above authorizations for disclosure or require clarification, you should contact your DMIP or FOIPP Coordinator.*

| <b>s. 33.2</b> | <b>Disclosure inside Canada only</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Yes</b> | <b>No</b> | <b>n/a</b> |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|------------|
| <b>(a)</b>     | For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)                                                                                                                                                                                                                                                                                                                                                                                                      | x          |           |            |
|                | <b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b><br><br><b>Original purpose is for enrolling BC residents in the Medical Services Plan (MSP) and enabling registered practitioners to bill for claims under MSP.</b><br><br><b>Secondary, consistent use is to provide historic data for the purposes of answering questions / issues with patient and practitioner inquiries.</b> |            |           |            |
| <b>(b)</b>     | To comply with a subpoena, warrant or order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information                                                                                                                                                                                                                                                                                                                                                             | x          |           |            |
| <b>(c)</b>     | To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister                                                                                                                                                                                                                                                                                                                                                 | x          |           |            |

| s. 33.2 | Disclosure inside Canada only                                                                                                                                                                                                                                               | Yes | No | n/a |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| (d)     | To an officer or employee of a public body or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties of the officer, employee or minister to whom the information is disclosed | x   |    |     |
| (e)     | To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister                                                                                                | x   |    |     |
| (f)     | To the auditor general or any other prescribed person or body for audit purposes                                                                                                                                                                                            | x   |    |     |
| (g)     | To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem                                                                                                                                  |     | x  |     |
| (h)     | To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry                                                                                                                           |     | x  |     |
| (i)     | To a public body or a law enforcement agency in Canada to assist in a specific investigation                                                                                                                                                                                |     |    |     |
|         | (i) undertaken with a view to a law enforcement proceeding, or                                                                                                                                                                                                              | x   |    |     |
|         | (ii) from which a law enforcement proceeding is likely to result                                                                                                                                                                                                            | x   |    |     |
| (j)     | To the archives of the government of British Columbia or the archives of a public body, for archival purposes                                                                                                                                                               | x   |    |     |
| (k)     | In accordance with section 35 (disclosure for research or statistical purposes)                                                                                                                                                                                             |     | x  |     |
|         | <b>Additional details as required</b>                                                                                                                                                                                                                                       |     |    |     |

## V DISCLOSURE OF PERSONAL INFORMATION cont'd

### 2) Systematic or Repetitious Disclosure/Exchanges?

|      |                                                                                                                               | Yes | No | n/a |
|------|-------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| i.   | Do the disclosures of personal information under section 33.2 occur on a regular basis?                                       | x   |    |     |
| ii.  | Has an Information Sharing Agreement been completed for these disclosures/exchanges?                                          | x   |    |     |
| iii. | Has information related to the Information Sharing Agreement(s) been entered into the <b>Personal Information Directory</b> ? |     | x  |     |

**Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of**

the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.

### 3) Research or Statistical Purposes (Section 35)

|                                                                                                          | Yes | No | n/a |
|----------------------------------------------------------------------------------------------------------|-----|----|-----|
| Has a researcher requested access to personal information in an identifiable form for research purposes? |     | x  | x   |

If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact your DMIP or FOIPP Coordinator for assistance.

**Please note:** Research using personal information may only be conducted if it meets all of the terms of section 35.

### 4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the School Act) may disclose personal information or cause personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

|     |                                                                                                      | Yes | No | n/a |
|-----|------------------------------------------------------------------------------------------------------|-----|----|-----|
| (a) | The disclosure would not be an unreasonable invasion of personal privacy under section 22            | x   |    |     |
| (b) | The disclosure is for historical research and is in accordance with section 35 (research agreements) |     |    | x   |
| (c) | The information is about someone who has been dead for 20 or more years                              |     |    | x   |
| (d) | The information is in a record that has been in existence for 100 or more years                      |     |    | x   |

**If you have not answered “yes” to any of the above authorizations for disclosure or if you require clarification, please contact your DMIP or FOIPP Coordinator.**

## VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION

(Section 28 and section 29 of the FOIPP Act)

If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

Efforts to ensure that personal information is accurate and complete are outside the scope of this privacy impact assessment. However, processes are in place today at ICBC, Service BC and MOH to ensure personal information is accurate and complete. Since this project intends to leverage existing processes as much as possible, and accuracy and correction of personal information are key privacy requirements in any project, these considerations will be incorporated.

|    |                                                                                                                                                            | Yes                                                                                  | No | n/a |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----|-----|
| 1. | Are there procedures in place to enable an individual to request/review a copy of their own personal information?                                          | x                                                                                    |    |     |
| 2. | Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file? | x                                                                                    |    |     |
| 3. | If personal information is corrected, are there procedures in place to notify other holders of this information?                                           | x                                                                                    |    |     |
|    | If yes, please provide the name of the policy and/or procedures, a contact person and phone number.                                                        |                                                                                      |    |     |
|    | Policy/procedure:                                                                                                                                          | HIBC Work Instruction 8.4.2 'Collection, Use and Correction of Personal Information' |    |     |
|    | Contact person:                                                                                                                                            | Bev Hooper, Chief Privacy Officer, HIBC                                              |    |     |
|    | Phone number:                                                                                                                                              | 250-405-3726                                                                         |    |     |
|    | Additional details as required                                                                                                                             |                                                                                      |    |     |

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator for further clarification.***

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
(Sections 30 and 30.1 of the FOIPP Act)

**Note:** For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the Signatures section.

For PIAs that do not involve systems initiatives, this section should be completed by the Branch or DMIP/FOI Coordinator completing the PIA. In this case, the signature of the systems representative is not required.

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Yes | No | n/a |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | <p>Is there reasonable technical security in place to protect against unauthorized access or disclosure?</p> <p><b>Note:</b> A series of Security Threat and Risk Assessments are being undertaken by the Project Team. BC Services Card will only proceed with satisfactory resolution of the results of these assessments.</p> <p>Authentication, authorization and encryption will be implemented in the solution as described in <b>Appendix F</b>.</p> <p>The production application code and data reside on the mainframe which is secured with RACF access control. The development environment will be PC-based where the application code will reside in the PCs and on the LAN with restricted access. Any personal data in the code will be masked at the requirements documentation level and development test data that will be used in the development environment will also be masked.</p> | x   |    |     |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |   |  |  |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--|--|
| 2. | <p>Is there reasonable physical security in place to protect against unauthorized access or disclosure?</p> <p><b>Note:</b> A series of Security Threat and Risk Assessments are being undertaken by the Project Team. BC Services Card will only proceed with satisfactory resolution of the results of these assessments.</p> <p>The mainframe is housed at the HP Data Center in Calgary Alberta and the physical access to the data centre is restricted to a limited number of persons based on operational requirements. The specifications for the Data Centre meet or exceed the Uptime Institute's Tier III level.</p> <p>The Data Centre is specifically designed to maximize the security and availability of mission-critical computing environments. Data centre entrances are staffed 7x24 with professional security officers. Secure and bullet-resistant, these entrances are equipped with biometric access controls to ensure that only authorized and personnel can enter.</p> <ul style="list-style-type: none"> <li>- Movement of equipment and personnel is monitored at all times and strictly controlled, both into and out of each data centre.</li> <li>- A complex video surveillance network covers each facility. All areas are actively monitored by security and archived for future reference.</li> <li>- Biometric readers control access into data centres and individual customer enclosures.</li> <li>- Co-location cabinets and custom-build cages provide secure, dedicated environments for customers within each data centre.</li> <li>- Pre-engineered cable plants allow for rapidly deployed cross connects between customer environments and/or external links to outside carriers.</li> <li>- Control centres are staffed on a 7x24 basis, continuously monitoring all critical data centre systems and activity. The control centres are assisted in each data centre by onsite teams of data centre technicians and security guards.</li> </ul> <p>The Data Centre operates its own systems for continuous power and cooling distribution. These systems are engineered to operate at 100 per cent capacity with at least N+1 redundancy. Through a capacity reservation system, a dedicated portion of the capacity of these systems is reserved for each customer.</p> <p>Given the critical nature of customer operations, multi-stage fire detection and suppression systems are located throughout the data centre .</p> <ul style="list-style-type: none"> <li>- Power generation plants are an integral part of the data centre.</li> <li>- Uninterruptible power systems condition power from the public utility system and the Data Centre power generators to protect customer equipment.</li> <li>- Multiple on-site fuel storage systems provide fuel for power generators. On-line refuelling systems ensure generators can run indefinitely in the event of extended outages of public utility power.</li> <li>- Cooling systems are engineered to meet the demands of modern high-density computer hardware.</li> <li>- Air handling systems constantly monitor and adjust temperature and humidity to ensure maximum air quality and effective cooling for customer equipment.</li> <li>- Extensive, zoned, very early warning smoke detection systems operate throughout the Data Centre. These systems analyze air sample for signs of possible combustion and enable operations to pinpoint a fire threat virtually before it starts.</li> <li>- Dry-pipe, pre-action sprinkler systems are deployed.</li> </ul> | x |  |  |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--|--|



|                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                       |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?                                                                                                                                                                                                                                                                                                                          | x                                                                                                                                     |  |  |
| <b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                       |  |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Policy/procedure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | HIBC Security Policies and Procedures<br>RACF security, encrypted Secure Sockets Layer, physical security of hardware - See Section 2 |  |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Contact person:                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Kent Berger-North, Security Officer                                                                                                   |  |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Phone number:                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | (250) 405-3791                                                                                                                        |  |  |
| <b>Additional details as required</b>                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                       |  |  |
| 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Have user access profiles been assigned on a need-to-know basis?<br><br>Only authorized Support Users and application developers will have access to the MSP Claims processing system and the development environment, and will follow the policies and standards defined in the MAXIMUS BC Security Policy v 2.3 dated October 2005.                                                                                                                                                 | x                                                                                                                                     |  |  |
| 5.                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Do controls and procedures exist for the authority to add, change or delete personal information?<br><br>Only authorized Support Users and application developers will have access to MSP Claims processing system and the development environment, and will follow the policies and standards defined in the MAXIMUS BC Security Policy v 2.3 dated October 2005.                                                                                                                    | x                                                                                                                                     |  |  |
| 6.                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?                                                                                                                                                                                                                                                                                                                              | x                                                                                                                                     |  |  |
| <b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b><br><br>Regular annual audits of all HIBC systems are conducted by an external auditor including SysTrust assessments.<br><br>Ad hoc reviews are conducted on the different systems to make sure that users who have access to these systems have the appropriate authorization and access according to their job functions. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                       |  |  |
| 7.                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Does the audit identify inappropriate accesses to the system?<br><br><b>Note:</b> A series of Security Threat and Risk Assessments are being undertaken by the Project Team. BC Services Card will only proceed with satisfactory resolution of the results of these assessments.<br><br>A report that tracks transactions against User IDs is produced on an ad hoc basis and as requested by management to monitor suspected inappropriate and unauthorized accesses to the system. | x                                                                                                                                     |  |  |

**Additional details**

The personally identifiable data is under the control of the MSP Claims and R&PB Systems.  
Current and Archived records can only be accessed by limited staff at HIBC for the purposes of performing their duties and /or solving billing issues with medical practitioners and patients within the last seven years.

***If any of the questions above have been answered "no", please contact your DMIP or FOIPP Coordinator.***

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

|  |                                                            | Yes | No | n/a |
|--|------------------------------------------------------------|-----|----|-----|
|  | Will the information be stored or accessed only in Canada? | x   |    |     |

**Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

|    |                                                                                                                                                                                                             | Yes | No | n/a |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?                                    |     |    | x   |
|    | <b>Please explain</b>                                                                                                                                                                                       |     |    |     |
| 2. | Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ? |     |    | x   |
|    | <b>Please explain</b>                                                                                                                                                                                       |     |    |     |
| 3. | Will the personal information be disclosed under section 33.1(1)(i.1)?                                                                                                                                      |     |    | x   |
|    | <b>Please explain</b>                                                                                                                                                                                       |     |    |     |

***If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact your DMIP or FOIPP Coordinator.***

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

**If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.**

As previously noted this is a conceptual PIA. The retention of personal information will be the responsibility of the individual program areas and is outside the scope of this privacy impact assessment.

|    |                                                                                                                                                                      | Yes | No | n/a |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Do you have an approved records retention and disposition schedule?<br>The retention schedule number is: 142798                                                      | x   |    |     |
| 2. | Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use? | x   |    |     |

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your DMIP or Records Officer.***

**Note:** Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.

**IX DIRECTOR/MANAGER OF INFORMATION AND PRIVACY (DMIP) OR FOIPP COORDINATOR REVIEW**

|    |                                                                                                                                                                                                             | Yes | No | n/a |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|
| 1. | Have you contacted the individual responsible for the completion of the PIA to discuss the information submitted, in particular those questions identified by an asterisk (*)?                              | x   |    |     |
| 2. | Does the initiative meet the requirements of the FOIPP Act?                                                                                                                                                 | x   |    |     |
| 3. | Is there a mechanism in place to review this PIA, as appropriate, to ensure the information remains current?                                                                                                | x   |    |     |
| 4. | Are you satisfied that the policies/procedures for correction and/or annotation are adequate?                                                                                                               | x   |    |     |
|    | <b>If there is additional information that would support the intended collection, use or disclosure of the personal information, please either insert in the appropriate text box or append to the PIA.</b> |     |    |     |
|    | <b>Comments</b>                                                                                                                                                                                             |     |    |     |

**X SIGNATURES****PUBLIC BODY APPROVAL:**

\_\_\_\_\_  
Lindsay Kislock  
Assistant Deputy Minister  
HSIMT  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Carolyn Bell  
Executive Lead – BC Services Card Project  
Business Management Office  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Deb McGinnis  
Executive Director  
eHealth Privacy, Security and Legislation Office  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Stephanie Power  
A/ Executive Director  
Medical Services Division  
Ministry of Health

\_\_\_\_\_  
Date

\_\_\_\_\_  
Bev Hooper  
Chief Privacy Officer  
Health Insurance BC

\_\_\_\_\_  
Date

\_\_\_\_\_  
Kent Berger-North  
Chief Security Officer  
MAXIMUS BC

\_\_\_\_\_  
Date

\_\_\_\_\_  
Charmaine Lowe  
Executive Director  
Standards & Architecture  
Ministry of Labour & Citizens Services

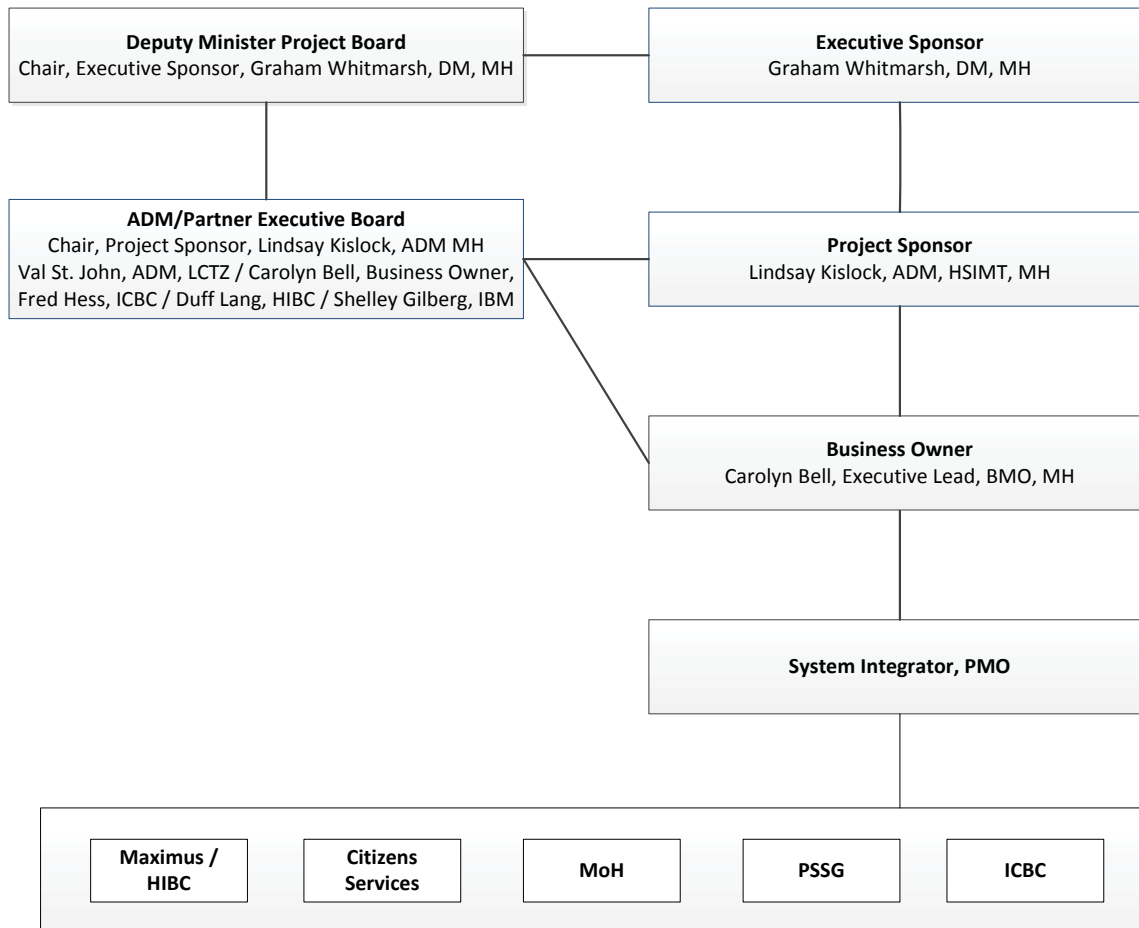
\_\_\_\_\_  
Date

GO TO: [PERSONAL INFORMATION DIRECTORY](#) (to add PIA and/or ISA summary)

## APPENDICES

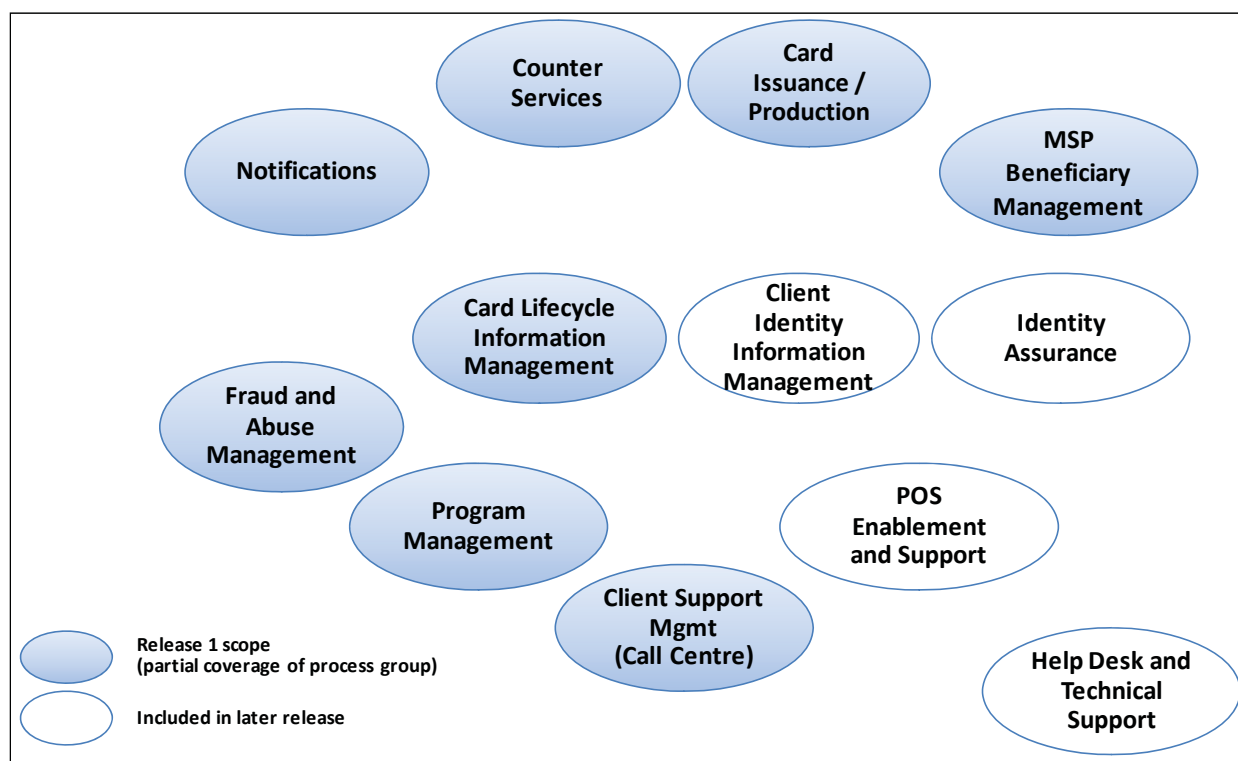
### APPENDIX A:

#### PROJECT GOVERNANCE STRUCTURE



**APPENDIX B****BC SERVICES CARD PROCESS GROUPS IN MORE DETAIL****Business Process Groups**

The following figure depicts the business process groups included in the BC Services Card program. The text following the diagram includes a short description of each process group.



The first 4 process groups are considered the core services to be provided by the project.

1. **Notifications** – Activities associated with notifying clients of the expiry of their BCDL and / or MSP coverage. For those clients receiving a photo card, this notification will either be included by ICBC with their BCDL renewal notice or provided by mail by Health Insurance BC (HIBC). The scope of this process group includes both re-enrolments and first-time enrolments triggered by BC Services Card program initiation or arrival of a new BC resident.
2. **Counter Services** – Includes processes performed at BCDL Offices(s) by ICBC staff, Government Agents, or Appointed Agents to issue either combination or standalone photo BC Services Cards to drivers and MSP beneficiaries. This process group includes activities such as identity proofing of documents presented by the clients, confirming the client's MSP eligibility and other MSP enrolment business rules, collecting any fees payable for DL's / BCID issued, and providing an interim BCDL and MSP beneficiary document for use until the client receives their BC Services Card in the mail.

- a. Counter services also includes support transactions such as card replacement and is applicable to both current and new BC residents.
3. **Card Issuance / Production** – Includes the activities associated with producing card(s) and mailing them to clients after completion of additional business and audit processes. This process group also generates and shares information with other process groups that mark each card's progress towards production and mailing to the client.
4. **MSP Beneficiary Management** – For those clients who are not drivers or not able to present at a DLO for a standalone BC Services Card, or not required to re-enrol in MSP, this process group will generate and send a card request for a non-photo standalone BC Services Card to Card Issuance / Production. For all BC residents, regardless of the type of card they receive, this process group is responsible for administering the MSP beneficiary information including the expiry date of their coverage.
5. **Card Lifecycle Management** – Includes the services associated with managing a BC Services Card through its lifecycle including:
  - a. The assignment of an activation code in Counter Service for subsequent use by the client in activating their BC Services Card,
  - b. Maintaining client information received from BC Services Card points of service,
  - c. Maintaining relationships between this client information and the card identifiers assigned during Card Issuance / Production, and
  - d. Deactivate cards for individuals that have left the province or require a replacement card.
6. **Client Support Management (Call Centres)** – Call centre services for responding to general client queries regarding the BC Services Card including when they might receive their permanent card, how to get replacements, where to submit application forms, etc. Included in this process group is aligning current partner call centres and information management so that required card status information is available at designated call centres to respond to a defined set of client inquiries.
7. **Program Management** – The collection of internal functions needed to ensure ongoing effectiveness of the BC Services Card Program. Includes such things as:
  - a. General suite of program monitoring services to enable tracking and changes over time of throughput, service volumes, costs, and other performance metrics. Specifically includes metrics for measuring identity and credential misuse and abuse,
  - b. Ongoing program communications, such as may be required for appeals, exceptional interventions and public,
  - c. Alignment and management of policies and responsibilities across partner organizations, and
  - d. Agreements among the partner agencies (e.g., Service level agreements, information sharing agreements, etc.).
8. **Fraud and Investigations** – Services to detect, investigate and respond to potential BC Services Card misuse and abuse. Operates as an integrated service across all participating government programs.
9. **Help Desk and Technical Support** – Support services for internal users of BC Services Card program systems, including integrated approach to call routing and tiered support model.
10. **Client Identity Information Management** – The high-level BC Services Card business model requires maintenance of client identity information by Vital Statistics Branch, ICBC, HIBC, and the Ministry of Labour, Citizens' Services and Open Government. Life events, name changes, and other changes to client identity and demographic information may occur at any of these points of services. This process group is responsible for managing changes to identity information and

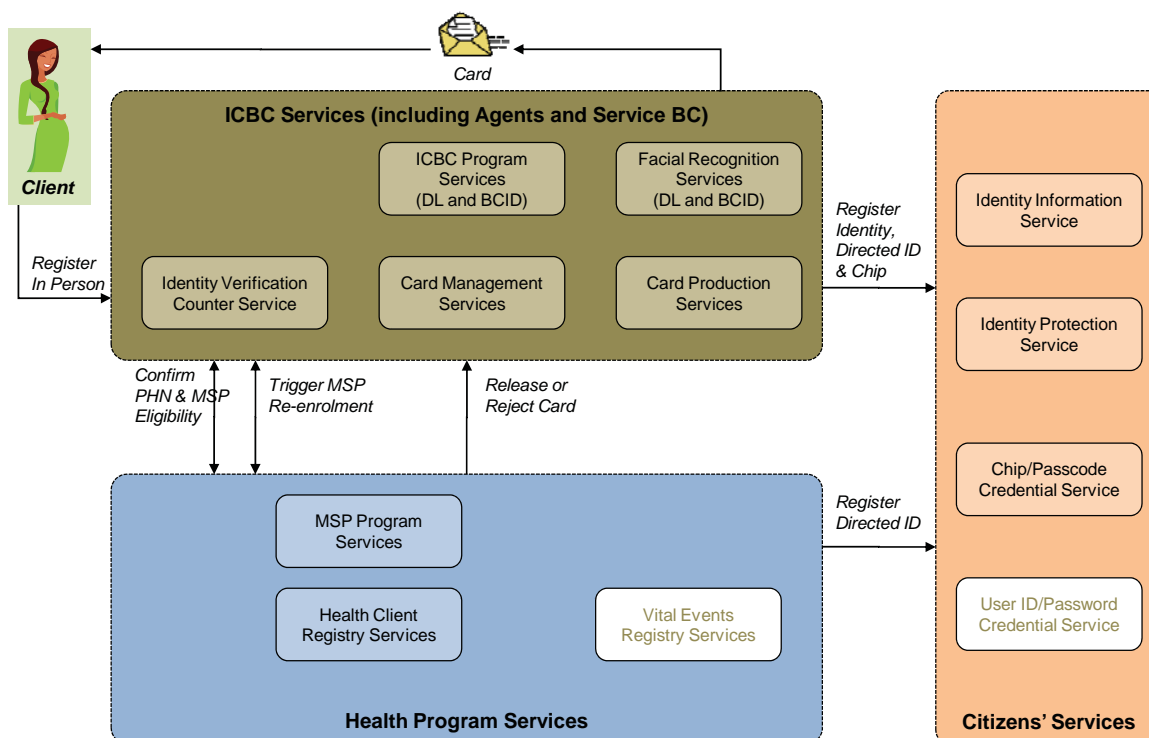


particularly its synchronization to other BC Services Card participating client identity systems and participating programs in the event of changes (e.g. name change, death, etc.). It also supports a person demographic query function that provides access to Personal Health Number (PHN) and other person demographic information to authorized users.

11. **Identity Assurance Services** – Services to record and share identity information across government programs while ensuring the protection of private and program-specific information. It also includes services to authenticate the chip embedded in the BC Services Card for use both at a Point of Service (PoS) and online access.
12. **Point of Service Enablement and Support** – Services to enable health care points of services (e.g., physician's offices, community diagnostic laboratories) to validate cards and cardholder eligibility at time of card presentation and generate audit events of suspicious card use.
  - a. Validating cards and cardholder eligibility can also include:
  - b. Continued use of installed magnetic stripe readers in health care point of service (except in the case of the combination BC Services Card which contains other information in the magnetic stripe) that reduces errors and simplifies entry of the Personal Health Number (PHN),
  - c. Use of card reader terminals that integrate with health care point of service systems, that simplify the typing of the PHN,
  - d. In future, use of card reader terminals that are independent of health care point of service systems that have built-in display to show the photo of the person, their name, date of birth, PHN and MSP coverage,
  - e. Also in the future, enable searches of the Identity Assurance Service using name, date of birth (or other allowable search criteria) and return an identity photo to authenticate that the individual matches the likeness of the photo, and
  - f. Includes services to assist on boarding and troubleshooting of POS connections.

**APPENDIX C****FUTURE TYPICAL PROCESS FOR GETTING A BC SERVICES CARD**

**Scenario: Photo Card Request & MSP Re-Enrolment for Driver, Age 19-74**



It is proposed that the ICBC Counter Services could be responsible for executing additional processes to those they currently perform at the counter as follows:

- ☐ Confirm Card Preferences
- ☐ Educate Client about Options
- ☐ Notify/Consent to Info Purposes
- ☐ Verify Health Program ID (PHN) and MSP Eligibility
- ☐ Update Client Registry (TBD)
- ☐ Assert Residency (TBD)
- ☐ Obtain MSP Declaration (TBD)
- ☐ Collect Corporate ID Information
- ☐ Issue Temporary "PHN" Card

## APPENDIX D

### FUTURE TYPICAL PROCESS FOR USING A BC SERVICES CARD



12

**APPENDIX E****BC SERVICES CARD – DATA ELEMENTS**

The following table is extracted from the Interface Specification produced by MAXIMUS BC in collaboration with ICBC.

| Element/Structure | Data Format | Description | Example    |
|-------------------|-------------|-------------|------------|
| PHN               |             |             | 9999999999 |
| First Name        |             |             |            |
| Middle Name       |             |             | S22        |
| Last Name         |             |             |            |
| Date of Birth     |             |             |            |
| Address Structure |             |             |            |
| Apartment/Unit    |             |             | 3A         |
| Street Number     |             |             | 1829       |
| Street Name       |             |             | Main St.   |
| City              |             |             | Vancouver  |
| Province          |             |             | BC         |
| Postal Code       |             |             | V8V 3P6    |
| Gender            | S15         | S15         | M          |
|                   | S15         |             | Y          |
|                   | S15         |             |            |

**APPENDIX F.**

S15

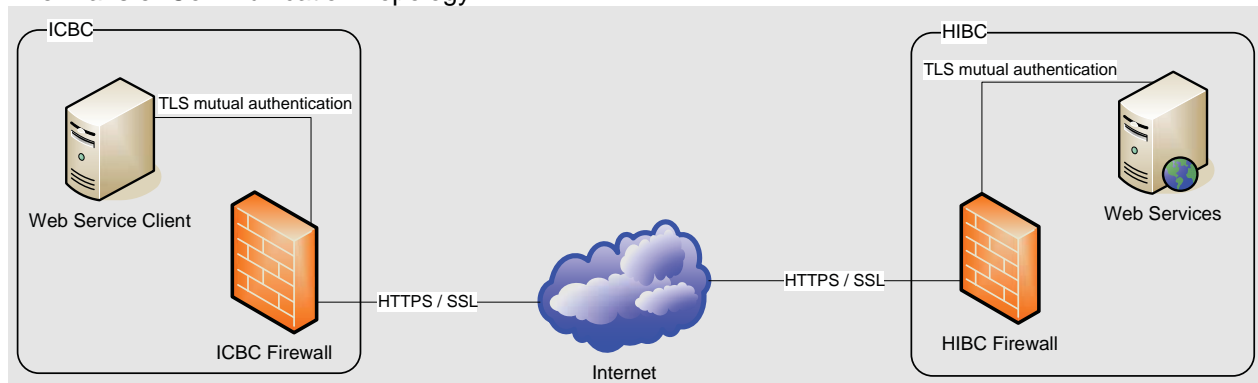
S15

## File Transfer

To transfer a file from ICBC to HIBC, an HIBC initiated process will pull the file from an ICBC file server via FTPS. To transfer a file from HIBC to ICBC an HIBC initiated process pushes the file to an ICBC file server via FTPS. These transactions take place within the Provincial SPAN/BC network. Firewalls and proxy servers will be configured to allow FTPS traffic between both parties. SSL encryption is implicit in the FTPS file transfer and secures the data in transit. The control channel will also be encrypted as authentication at the ICBC server will be accomplished via simple userid and password. Securing data at rest within the network of either party is the responsibility of the respective party and not within scope of this document.

This communication pattern aligns with ICBC's Integration Architecture Principles.

### File Transfer Communication Topology



**Figure 2 - File Transfer Communication Topology**

**NOTE: The above sections were extracted from the HIBC BC Services Card – Interface Specification version 0.6 dated January 30, 2012**

**From:** [Dunlop, Heather L HLTH:EX](#)  
**To:** [Van Den Bulk, Jeannette CITZ:EX](#); [Thambirajah, Natasha HLTH:EX](#);  
**cc:** [Dunlop, Heather L HLTH:EX](#); [Keay, Liz HLTH:EX](#); [Moir, Patti L HLTH:EX](#);  
**Subject:** BC Services Card -- Confirming PIA Approach  
**Date:** Monday, March 5, 2012 11:24:23 AM

---

Hi Jeannette & Natasha,

Just following up from Friday's meeting, here's what I think we agreed to as next steps (please tweak as required).

- You will share draft 'end-to-end' PIA that you have in progress for LCS – the intention being that Liz and I will have a chance to review and understand scope of that PIA and from there how the MoH-specific PIA will be scoped so that it points to the LCS PIA as the 'central' or 'overarching' PIA. [It would be great to get that today/tomorrow if possible.]
- We will then get together at the end of this week to discuss:
  - Overall approach to PIAs for the initiative – how many, scope of each, how they will relate.
  - Approach to OIPC – how is this being led/ coordinated? What will be included in the submission? Timing? We also talked about coordinating this with the submission of the legislation/regulation PIA that Robyn is developing for the regulation changes to the MPA.

Following our initial meeting, we will engage ICBC to make sure that all three parties are aligned in the overall approach, and in the meantime Natasha is going to connect with Jay Libove (sp?) at ICBC to confirm who their privacy lead is for this initiative and whether they also have a PIA in progress. On reflection, if you feel that having the three parties included in this week's meeting is a better way to go, then I'm happy to do that.

**Patti** – could you please set up a one-hour meeting for the four of us for Thursday or Friday afternoon this week. Liz and I can go to Jeanette & Natasha's office if that's better for them.

Thanks,  
Heather

**Heather Dunlop**

A/ Director | eHealth Privacy and Legislation | Ministry of Health  
3rd Floor - 1483 Douglas St | Victoria BC V8W 3K4

email: [heather.dunlop@gov.bc.ca](mailto:heather.dunlop@gov.bc.ca) | ph: 250-387-1264 | fax: 250-356-2530

***Please note new office location and contact information.***



**From:** [Bailey, Ian D CITZ:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX](#); [Lowe, Charmaine CITZ:EX](#);  
**Subject:** FW: Presentation on SecureKey/ICBC Card and Chip Model  
**Date:** Tuesday, February 28, 2012 3:57:27 PM

---

Fyi...

---

**From:** Dunlop, Heather HLTH:EX  
**Sent:** Tuesday, February 28, 2012 3:55 PM  
**To:** Bailey, Ian D LCTZ:EX  
**Cc:** Dunlop, Heather HLTH:EX  
**Subject:** RE: Presentation on SecureKey/ICBC Card and Chip Model

Anything that you can share would be helpful.

Many thanks,  
Heather

Heather Dunlop

A/ Director | eHealth Privacy and Legislation | Ministry of Health  
3<sup>rd</sup> Floor - 1483 Douglas St | Victoria BC V8W 3K4  
email: [heather.dunlop@gov.bc.ca](mailto:heather.dunlop@gov.bc.ca) | ph: 250-387-1264 | fax: 250-356-2530

***Please note new office location and contact information.***

---

**From:** Bailey, Ian D LCTZ:EX  
**Sent:** Tuesday, February 28, 2012 3:47 PM  
**To:** Dunlop, Heather HLTH:EX  
**Subject:** RE: Presentation on SecureKey/ICBC Card and Chip Model

We can help with more detailed documents that accurately describe “how it works”.

---

**From:** Dunlop, Heather HLTH:EX  
**Sent:** Tuesday, February 28, 2012 3:41 PM  
**To:** Bailey, Ian D LCTZ:EX  
**Cc:** Dunlop, Heather HLTH:EX  
**Subject:** RE: Presentation on SecureKey/ICBC Card and Chip Model

Hi Ian,

I do expect to be connecting with Charmaine’s office shortly on the approach to

the PIA(s). My office have just been pulled into support the project team on the PIA at the end of last week, so we are at this point gathering background to get up to speed quickly. No problem if you feel that the presentation isn't suited for sharing for this purpose.

Regards,  
Heather

Heather Dunlop

A/ Director | eHealth Privacy and Legislation | Ministry of Health  
3<sup>rd</sup> Floor - 1483 Douglas St | Victoria BC V8W 3K4  
email: [heather.dunlop@gov.bc.ca](mailto:heather.dunlop@gov.bc.ca) | ph: 250-387-1264 | fax: 250-356-2530

***Please note new office location and contact information.***

---

**From:** Bailey, Ian D LCTZ:EX  
**Sent:** Tuesday, February 28, 2012 3:29 PM  
**To:** Dunlop, Heather HLTH:EX  
**Subject:** RE: Presentation on SecureKey/ICBC Card and Chip Model

Heather, I don't think that it is suited for that purpose since I took quite a bit of liberty in simplifying things – have you been working with Charmaine Lowe's office on the PIA work?

---

**From:** Dunlop, Heather HLTH:EX  
**Sent:** Tuesday, February 28, 2012 3:14 PM  
**To:** Bailey, Ian D LCTZ:EX  
**Cc:** Dunlop, Heather HLTH:EX  
**Subject:** FW: Presentation on SecureKey/ICBC Card and Chip Model

Hi Ian,

Wondering if you may be prepared to share this afternoon's presentation with me for use in the PIA work on behalf of the project team – it would be helpful.

Thanks,  
Heather

Heather Dunlop

A/ Director | eHealth Privacy and Legislation | Ministry of Health  
3<sup>rd</sup> Floor - 1483 Douglas St | Victoria BC V8W 3K4

***Please note new office location and contact information.***

---

**From:** Bell, Carolyn P HLTH:EX  
**Sent:** Tuesday, February 28, 2012 3:12 PM  
**To:** Dunlop, Heather HLTH:EX; Schmidt, Tracee HLTH:EX  
**Subject:** Re: Services Card - PIA/STRA Work

Please request it directly from him. Good idea

---

**From:** Dunlop, Heather HLTH:EX  
**Sent:** Tuesday, February 28, 2012 03:10 PM  
**To:** Bell, Carolyn P HLTH:EX; Schmidt, Tracee HLTH:EX  
**Cc:** Dunlop, Heather HLTH:EX  
**Subject:** Services Card - PIA/STRA Work

Hi Carolyn/ Tracee,

Just thinking that the slide-deck from this afternoon's presentation may be helpful for the PIA/STRA work if Ian is willing to share.

Thanks,  
Heather

**Heather Dunlop**

A/ Director | eHealth Privacy and Legislation | Ministry of Health  
3<sup>rd</sup> Floor - 1483 Douglas St | Victoria BC V8W 3K4  
email: [heather.dunlop@gov.bc.ca](mailto:heather.dunlop@gov.bc.ca) | ph: 250-387-1264 | fax: 250-356-2530

***Please note new office location and contact information.***

**From:** [Keay, Liz HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX](#); [Dunlop, Heather L HLTH:EX](#);  
[Van Den Bulk, Jeannette CITZ:EX](#);  
**cc:** [Moir, Patti L HLTH:EX](#);  
**Subject:** RE: BC Services Card -- Confirming PIA Approach  
**Date:** Tuesday, March 6, 2012 9:59:39 AM

---

Thanks Natasha.

S22

Elizabeth Keay

Sr Policy Analyst | eHealth Privacy, Security and Legislation | Ministry of Health  
3<sup>rd</sup> Floor – 1483 Douglas St | Victoria BC V8W 3K4  
email: [liz.keay@gov.bc.ca](mailto:liz.keay@gov.bc.ca) | ph: 250-387-1290 | fax:250-356-2530

---

**From:** Thambirajah, Natasha LCTZ:EX  
**Sent:** Monday, March 5, 2012 11:39 AM  
**To:** Dunlop, Heather HLTH:EX; Van Den Bulk, Jeannette CITZ:EX  
**Cc:** Keay, Liz HLTH:EX; Moir, Patti L HLTH:EX  
**Subject:** RE: BC Services Card -- Confirming PIA Approach

Hi Heather,

Thanks for your email. An end of the week meeting seems just fine to me.

Since I started working on this project two (three?) years ago, my privacy contact at ICBC for this project is Christina Ulveteg. She has been very deeply involved in this project since the beginning and I worked with her on a number of PIAs etc related to this project. I informally chatted with her last week and it may be useful to have her at the meeting this week. This is her email: [Christina.Ulveteg@icbc.com](mailto:Christina.Ulveteg@icbc.com) (she works in Vancouver). I think Jeannette is more familiar with Jay and we can involve him as well. I understand that Kathy Thomson usually cc's the both of them when there's something Services Card and privacy related. It doesn't seem like ICBC has a PIA in progress although they may have some internal things in the works.

I'm sending a picture of the solution for issuing photo and non-photo cards to give you all something to look at before we send you the PIA. It's still a draft and may change (what doesn't change on this project?! ☺). This is to give you an idea of the head space we're in.

If you'd like to come to visit us, Patti, please coordinate with Heather Fay regarding

meeting space here.

Thanks!

Natasha

Natasha A. Thambirajah  
Ministry of Labour, Citizens' Services and Open Government

---

**From:** Dunlop, Heather HLTH:EX  
**Sent:** Monday, March 5, 2012 11:24 AM  
**To:** Van Den Bulk, Jeannette CITZ:EX; Thambirajah, Natasha LCTZ:EX  
**Cc:** Dunlop, Heather HLTH:EX; Keay, Liz HLTH:EX; Moir, Patti L HLTH:EX  
**Subject:** BC Services Card -- Confirming PIA Approach

Hi Jeannette & Natasha,

Just following up from Friday's meeting, here's what I think we agreed to as next steps (please tweak as required).

- You will share draft 'end-to-end' PIA that you have in progress for LCS – the intention being that Liz and I will have a chance to review and understand scope of that PIA and from there how the MoH-specific PIA will be scoped so that it points to the LCS PIA as the 'central' or 'overarching' PIA. [It would be great to get that today/tomorrow if possible.]
- We will then get together at the end of this week to discuss:
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  - Approach to OIPC – how is this being led/ coordinated? What will be included in the submission? Timing? We also talked about coordinating this with the submission of the legislation/regulation PIA that Robyn is developing for the regulation changes to the MPA.

Following our initial meeting, we will engage ICBC to make sure that all three parties are aligned in the overall approach, and in the meantime Natasha is going to connect with Jay Libove (sp?) at ICBC to confirm who their privacy lead is for this initiative and whether they also have a PIA in progress. On reflection, if you feel that having the three parties included in this week's meeting is a better way to go, then I'm happy to do that.

**Patti** – could you please set up a one-hour meeting for the four of us for Thursday

or Friday afternoon this week. Liz and I can go to Jeanette & Natasha's office if that's better for them.

Thanks,  
Heather

Heather Dunlop

A/ Director | eHealth Privacy and Legislation | Ministry of Health

3<sup>rd</sup> Floor - 1483 Douglas St | Victoria BC V8W 3K4

email: [heather.dunlop@gov.bc.ca](mailto:heather.dunlop@gov.bc.ca) | ph: 250-387-1264 | fax: 250-356-2530

***Please note new office location and contact information.***

**From:** [Wiebe, Patricia CITZ:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** RE: Business Solution Architecture Diagram v.06  
**Date:** Wednesday, February 29, 2012 11:27:18 PM

---

Hi Natasha – here is my feedback for “the day” ☺

#### Solution comments

- Page 1 / step 3 – should describe how the CSR looks up the PHN – “using an integrated query tool”
- I didn’t know step 4 a ... I thought they were supposed to contact the HIBC call centre for resolution, not mail in an MSP app form again
- Step 9 a – IBM does not send card updates direct to MSP. It goes through ICBC. So maybe you need to add a number after 9 before 10.
- Step 9 b – we are still going to confirm that it is legal to have ICBC send a PHN to IAS in this way. Check in with Char about this later.
- You need to add 9 d – that IBM will send chip data to SecureKey for the purposes of card management to support future authentication.
- Step 10 – I think you should elaborate a bit more to say that EMPI gets updated identity info from IAS and updates its records by matching PHN. Something like that.
- Step 11 – is not in scope of November, as far as I know. Do you know something I don’t?
- What would be step 12 – Be careful with the wording about “authoritative source”. Maybe “The EMPI is the registry of PHNs and corresponding identity information for the health care sector.”
- Page 2 – step 1 – why did you choose to focus only on adult getting non-photo card. What about newborn or request for child card?
- Step 2 – you should include a box similar to ICBC Counter, but called MSP Forms Processing? And the database between 2 and 3 is labelled incorrectly – should be renamed MSP Enrollment System as per page 1.

- Step 6 a – As per page 1 – IBM does not send data directly to MSP. It goes through ICBC.

#### Misc wording comments

- Page 1 – state more clearly that it is combo or photo card – some people think they are distinct, some people group them
- “Ministry of Finance” is distracting and not relevant – suggest it be removed or explained in some other part of the PIA, but not so front-and-centre in these diagrams. Perhaps emphasize legislation, not governing body? Or emphasize public body?
- Step 2 - “identity registrar” – I think Char prefers the “agent” phrasing, so “Acting as an agent of the PIISP to register identities, ...”
- Inconsistent language - Sometimes you say “person”, “client” and “individual”. Pick one. IDIM uses “individual”. MoH uses “client”. I of course prefer “individual” because I’m attached to IDIM wording 😊. (I think MoH also used “individual” as a label for the 12-17 age range – which should have been labelled “youth”, but anyways...)
- “ICBC CSR” – acronym should be spelled out. Or say “ICBC counter staff”.
- Step 9b and 10 – “HDID” should be spelled out – “Health directed identifier (a special identifier for use with IAS)”
- I’d rather you not do the sub-numbering of 9a, 9b, etc.. Just use sequential numbers.

#### Misc graphical comments

- Page 1 - Missing label “6.” on arrow
- Suggest you don’t have a visible border on text boxes – as the slide looks full of rectangles. Maybe also not have rectangles around database icons either.
- You could include “card” graphics (just a mini rectangle) along with your stick people inside the databases. This would illustrate how many



systems actually manage the card too. Every one but EMPI.

---

**From:** Thambirajah, Natasha LCTZ:EX  
**Sent:** Wednesday, February 29, 2012 11:22 AM  
**To:** Wiebe, Patricia LCTZ:EX  
**Subject:** Business Solution Architecture Diagram v.06

Ian asked me to send this to you for your review. Please make sure that this is aligned with the thinking of the day. Ha. I stress “the day” so that I’m prepared for what changes may come 😊

I’m using this for the overarching conceptual PIA. This means it includes the MSP registration info flows as well as the flows needed for the PIISP.

Thx.

N

**From:** [Friswell, Guy HLTH:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX](#); [Moss, Jeremy HLTH:EX](#);  
**Subject:** RE: Business Solution Architecture Diagram  
**Date:** Friday, February 17, 2012 9:53:06 AM

---

I've had a look at the materials and Jeremy's feedback. There's a lot of detail, but it generally seems correct. The acid test on detail is whether or not it contributes to the discussion that needs to occur (PIAs). Not sure that I can make that call since I'm not the privacy geek.

In no particular order:

- I'm in agreement with Jeremy on the stick people -- perhaps stick people inside a cylinder?
- I haven't done a PIA, but understand that there are two broad ideas: information in transit and information at rest. The question of what information will be resting vs. transiting each organization could be important. If so, you'd need to indicate the type of information held once received. For example, does ICBC retain the PHN or just print and forget? And is this germane to a PIA?
- I have a suggestion that would help all organizations. I'm thinking of a diagram in front of this one. It would show the scope of the overarching PIA as well as the patchwork of subordinate PIAs that will be developed for specific aspects. The intent would be clarify the scope of each PIA, and to feature the relationships amongst them. In particular, it would help to highlight any landscape that is exclusive to your overarching PIA.
- However, I'm not sure the composite diagram should be done on a use case by use case basis. Do you not need to make a comprehensive list of purposes for information exchange, and attach these purposes to each PIA? Not sure if this makes sense, but purposes would include: obtaining a photo card (including chip registration), obtaining a non-photo card, change address or name for a photo card, handling of inter-agency fraud/ investigations, inter-agency program/operational reporting, etc.
- With regards to HDID=Encrypted PHN, I agree that this is optimal and would prefer to see this. I do not feel that it represents a privacy risk, particularly if we're

assuming a public-private key encryption method.

S15

S15

S15

You have

to breach EMPI in order to get PHN, but that's where PHN belongs so it's not a privacy issue! It just makes everything easier overall.

- Step 12(B) I don't think is correct. The EMPI won't need assurance/identification levels. I made this mistake in some of my earlier materials.

- Step 1 - your discussion point - given that we are only sending net new MSP clients to the counter in the first five years, you're talking about new enrolees that are non-drivers and over 19. I don't see why they wouldn't be covered by your existing diagram. This ties into step 4 regarding unsuccessful PHN match - I think that this is only the case for re-enrolment. But re-enrolment is optional . So if I show up to renew my DL and can't match my PHN, the client can just say "forget it, too much work", and likely will if they have to mail in more forms and documents to HIBC.

S22

- I agree with your sentiment that you need to start somewhere and this is a good start. The view should be to build up the full set of purposes/cases/pictures so that all partners can properly assess their parts. It also gets you off the hook from doing PIAs for every damn thing!

Cheers,  
Guy

-----Original Message-----

From: Thambirajah, Natasha LCTZ:EX

Sent: February 16, 2012 10:03 PM

To: Moss, Jeremy HLTH:EX; Friswell, Guy HLTH:EX

Subject: RE: Business Solution Architecture Diagram

Hi Jeremy,

I appreciate the time you took to write your feedback, and I also appreciate the feedback itself - I learned a lot in just one email. I'm going to go with what you've suggested - although I think I will keep the stick ppl when using this

diagram to explain things to legislation people - the cylinders to indicate databases should be used for the PIA diagrams.

The HDID thing is giving me heartburn. It seems like the encrypted PHN (which LCTZ is going to encrypt in the IPS) will work as the HDID - is this your understanding?

I was uncomfortable about leaving the chip piece out. I agree that it can't be left out of the PIA ... I'm going to work the chip piece in the lower right side of the diagram I think.

We've got to start somewhere! I need this piece to make several other things move forward :)

Thanks again for your time and assistance.

N

---

From: Moss, Jeremy HLTH:EX  
Sent: 16 February 2012 21:47  
To: Thambirajah, Natasha LCTZ:EX; Friswell, Guy HLTH:EX  
Subject: RE: Business Solution Architecture Diagram

Hi Natasha,

This looks like a good effort. Normally I would say this is too "text heavy" as a standalone diagram, but if the intention is to be used as a descriptive image for a document like the PIA (and absolutely we need something like this for the PIA), then I think it is pretty good. As a high level, "accessible for people who aren't BCSC specialists", I don't think it is quite "high level enough". If someone is willing to take the time to plow through the diagram and understand it, it is great. However, some of the E.D.'s I've met with in the past probably wouldn't stick with the detail.

Maybe it is S22 and the fact I went through the change-of-name era from "BCSC" to "BC Systems Corporation", but I think we should avoid the BCSC acronym. Of course, it seems to be getting used all over. I'd stick with "Services Card".

I'd be tempted to make the line for Step #4 as a dotted line, since it is only req'd for enrolment or in special re-enrolment

cases.

I wouldn't call it "Card Tracking System" at Ministry of Health. Instead, I would use "MSP Enrolment System", which will be generic and work for both the current legacy R&PB and future Medigent systems.

I pointed out to Guy in a diagram he had produced (sorry, I forgot to tell you about it when you IM'ed me earlier today), that steps 9, 10 and 11 all occur at almost the same time. By sequencing them this way, it appears the card is sent to the individual before the IAS is updated. In reality, the IAS will probably be updated before the individual receives their card. This is a style issue, but my preference would be renumber 9, 10 and 11 as 9a, 9c and 9b respectively, to try and convey they are happening at almost the same time.

Step #12 is missing the Health Directed Identifier (HDID). Also, it is surprising the data elements are identified in Step #12, but not the previous steps. Also, and I'm being picky here, but I don't see the tie-in between use of "Enterprise Master Patient Index" and "EMPI". The acronym is used in box 12 before your eye has visually moved left (following the flow) to the Vital Stats Agency. Wouldn't be too bad if you put (EMPI) in brackets after the full description in the Vital Status box.

I think it is the residual techie in me, but I'm not sure I like the stick figures in the database boxes. I like the way you used the coloured people in your previous Fraud diagram, but not so much in this case. I kind of prefer the traditional 3D cylinder for databases, but am willing to admit I could be wrong.

I know it would confuse things, but for something like a PIA, I'm not sure if we can ignore the chip transactions & data flows. I'd almost like to see a higher level, over-arching / unifying diagram, or failing that, I think we need a separate diagram.

Sorry, I don't mean this to sound critical. I think it is an excellent effort. I'm just trying to point out the minor things I think it needs to make it better. I like your layout,

explanations and logical flow. However, I'll defer to Mr. Friswell, the MoH Diagram Master for his comments. And remember, it is much easier to criticize than it is to do!

Jeremy

---

From: Thambirajah, Natasha LCTZ:EX  
Sent: February 16, 2012 4:24 PM  
To: Moss, Jeremy HLTH:EX; Friswell, Guy HLTH:EX  
Subject: FW: Business Solution Architecture Diagram

Hi Jeremy and Guy

Charmaine has asked me to write an overarching conceptual PIA for the entire BCSC project. The assumption is that there will be a number of smaller PIAs (written by various project partners) that nest under this one.

In order to write this PIA, I have drawn a diagram of the end to end process for issuing a photo card. I need to do one for the non-photo as well. The primary objective of the diagram is to create a diagram that's accessible for people who aren't BCSC specialists. The other objective is to show major flows of information for the purpose of statutory analysis. I specifically left out the chip transactions out of this diagram because it's questionable whether the MBUN, etc constitutes identity information. I also didn't include the address/notifications information exchange from ICBC to HIBC.

Please let me know if I've got this correct. Please do not distribute this diagram.

Thank you.

Regards,  
Natasha

**From:** [Bailey, Ian D CITZ:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX;](#)  
**Subject:** RE: Business Solution Architecture Diagram  
**Date:** Thursday, February 16, 2012 9:56:52 PM

---

I think you have this right – with phn re IAS update already noted.

---

**From:** Thambirajah, Natasha LCTZ:EX  
**Sent:** Thursday, February 16, 2012 4:21 PM  
**To:** Bailey, Ian D CITZ:EX  
**Subject:** Business Solution Architecture Diagram

Hi Ian –

In addition to writing the designation and directions while Charmaine <sup>S22</sup> she also asked me to write an overarching conceptual PIA for the entire BCSC project. The assumption is that there will be a number of smaller PIAs that nest under this one.

In order to write this PIA, I have drawn a diagram of the end to end process for issuing a photo card. I need to do one for the non-photo as well. The primary objective of the diagram is to create a diagram that's accessible for people who aren't BCSC specialists. The other objective is to show major flows of information for the purpose of statutory analysis. I specifically left out the chip transactions out of this diagram because it's questionable whether the MBUN, etc constitutes identity information. I also didn't include the address/notifications information exchange from ICBC to HIBC.

Please let me know if I've got this correct.

Thank you.

Regards,  
Natasha

**From:** [Lowe, Charmaine CITZ:EX](#)  
**To:** [Thambirajah, Natasha HLTH:EX](#); [Van Den Bulk, Jeannette CITZ:EX](#);  
**Subject:** RE: Emailing: BC Service Card Draft PIA Feb 2012 v.02  
**Date:** Monday, March 5, 2012 11:17:00 PM

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Natasha,

Thanks for all your work on this. Don't worry Jeannette is a total pro at this stuff. She has 100% of my trust on this so believe me the PIA couldn't be in better hands. And Jeannette and I have long term working relationships with Christina and Jay Loder at ICBC so its all good.

I have asked Jeannette to lead the completion of the PIA because of her deep experience in this area. She is also leading coordination of the PIAs with Health and ICBC to make sure all aspects are covered and that all the PIAs are consistent.

S22

S22

Your role in the PIA was to provide a description of the program and to answer questions about information flows etc. If Jeannette has questions about anything relating to the program delivery or information flows, she will connect with you. You and I will also be involved in review of the revised PIA once Jeannette works her magic with it.

I have also involved Jeannette in the legal agreements discussions with Health because it is very much related to the PIA and ISAs that will need to be developed or reviewed by this office and this work will provide her with much needed background.

-----Original Message-----

From: Thambirajah, Natasha LCTZ:EX  
Sent: Mon, March 5, 2012 4:33 PM  
To: Van Den Bulk, Jeannette CITZ:EX  
Cc: Lowe, Charmaine CITZ:EX  
Subject: Emailing: BC Service Card Draft PIA Feb 2012 v.02

Hi Jeannette,

Please find the draft PIA attached. I followed the ICM PIA model as much as I possibly could, and the feedback you gave me after the first review is included in this document. I also included my draft legislative analysis that includes



authorities in FOIPP, the MVA, and the MPA for the overarching solution. Of course, I defer to your legislative experience, Jeannette. The privacy impact section is also quite drafty still.

As managing the relationship with ICBC is a delicate business in the overall project S22 instead of directly contacting ICBC privacy people as per our last meeting, I called Kathy Thomson and Sam Van der Mewe (their project manager) first. I have a good working relationship with both of them. I explained the context of MoH's March deadline and how this relates to the overarching PIA. I explained that you are the lead on our side for this. They were pleased that I called and are willing to send their privacy people to the meetings.

Sam confirmed that Christina Ulveteg (my historic privacy contact at ICBC when I worked at MoH) is the privacy point of contact at ICBC for the Services Card and mentioned that with enough notice, he's willing to send Christina over to Victoria to participate in meetings. As I have a great relationship with Christina, I looped her in for you, Jeannette, and mentioned the same things to her.

I'm happy to work with you should you need further assistance.

Regards,

Natasha

**From:** [Schmidt, Tracee HLTH:EX](#)  
**To:** [Bell, Carolyn P HLTH:EX](#); [Bamford, Kevena CITZ:EX](#); [Lowe, Charmaine CITZ:EX](#); [Bailey, Ian D CITZ:EX](#); [Gale, Catherine HLTH:EX](#); [Thambirajah, Natasha HLTH:EX](#); [Van Den Bulk, Jeannette CITZ:EX](#); [Dunlop, Heather L HLTH:EX](#); [Keay, Liz HLTH:EX](#); [Madden, Ken HLTH:EX](#); ["Christina.ulveteg@ICBC.com"](#); [Beyea, Bonnie HLTH:EX](#); [Prosser, Ken A CITZ:EX](#)  
**Subject:** RE: Planning Session to Discuss all BCSC PIA's  
**Date:** Sunday, March 18, 2012 7:49:47 AM

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Hi everyone

Here is the agenda for tomorrow afternoon's session that Heather Dunlop and Jeannette Van Den Bulk are leading.

**For Discussion:**

- Overview of Approach to PIAs for BCSC Project
- Scope of PIAs
- Roles & Responsibilities
- Timelines
- OIPC Consultation
- Dependencies
- Alignment with other Workstreams & Workplans – 'Agreements', 'Regulations', 'STRAs'
- Related Deliverables

Thanks Heather & Jeannette

-----Original Appointment-----

**From:** Bell, Carolyn P HLTH:EX

**Sent:** Mon, March 12, 2012 9:38 AM

**To:** Bell, Carolyn P HLTH:EX; Schmidt, Tracee HLTH:EX; Bamford, Kevena LCTZ:EX; Lowe, Charmaine CITZ:EX; Bailey, Ian D LCTZ:EX; Gale, Catherine HLTH:EX; Thambirajah, Natasha LCTZ:EX; Van Den Bulk, Jeannette CITZ:EX; Dunlop, Heather HLTH:EX; Keay, Liz HLTH:EX; Madden, Ken HLTH:EX; 'Christina. ulveteg@ICBC.com'; Beyea, Bonnie HLTH:EX; Prosser, Ken A LCTZ:EX; Pearce, Alison HLTH:EX

**Subject:** Planning Session to Discuss all BCSC PIA's

**When:** Mon, March 19, 2012 1:00 PM-3:00 PM (GMT-08:00) Pacific Time (US & Canada).

**Where:** HLTH R BMO Meeting Room 5th Floor 1483 Douglas St HLTH:EX

Dial in: S15, S17      Conference ID S15, S17      Moderator: Carolyn Bell

As Health must take a PIA to OPIC for the purposes of changes to MPA regulations as a result of the BC Services Card, it is important to present a complete picture of the Privacy Impact Assessments developed for the end-to-end BC Services Card Project.

This includes a corporate PIA from LCTZ, an ICBC PIA, Health's program PIA and Regulations PIA.

Heather and Jeanette, I would like you to lead the discussion, as your two pieces are the most significant.

## Lucas, Janet HLTH:EX

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**From:** Lucas, Janet HLTH:EX  
**Sent:** Friday, May 27, 2011 12:51 PM  
**To:** Bamford, Kevena CITZ:EX; St. John, Valerie SSBC:EX  
**Cc:** Bell, Carolyn P HLTH:EX  
**Subject:** FW: Summary of last Friday's meeting with Val and Kevena

**Categories:** FOI # HTH 2013-170

Val and Kevena,

I've summarized below the key discussion points, decisions and action items coming out of last Friday's meeting. Sorry it took a while to get it to you. If you see anything missing or incorrect, pls let me know,

### Meeting Summary (May 20, 2011)

May 19 news release and communications plan discussed

Action: Kevena to be consulted in development of Communications Plan

Treasury Board minute and follow up discussed – September date for report back to Treasury Board has been communicated to Project Teams.

Formal project agreements between Health and Citizens' Services –

Action: Janet to set up meeting with Kevena to discuss funding agreement, and share (redacted) copy of MOA in use with ICBC;

Val to share ICM inter-ministry MOU as possible model for longer-term MOU

Janet to share (draft) MOU with Ministry of Finance re: Revenue Management BC-HIBC relationship

Reviewed Citizen's Services maps of project organization and governance structure. Discussed naming and membership of new cross-partner ADM-level governance committee.

Name of Committee: Partner ADM Board

Membership: Project Sponsors and Business Owners for CITZ and Health; Fred Hess and Kathy Thompson for ICBC

Structure and Timing: 90 minute or 2 hours meetings once/month, one week before each DM Project Board meeting;

ICBC to be invited for ½ of the meeting; ½ of the meeting for CITZ and MOH only.

Actions: Holly to schedule meetings;

Val to provide TOR used of the ICM project ADM committee as possible model ;

Kevena to update and share map of joint Health-CITZ governance structure; Janet to review and add missing MOH details

Approach to procurement of card vendor discussed. "Re-usability" (leveraging already existing infrastructure and process) a key principle in designing the project.

Involvement of Information and Privacy Commissioner in development of MPA regulations and some DMPB meetings discussed.

Next meeting to be scheduled in two weeks.

Cheers!

*Janet M. Lucas*  
A/Executive Director  
Business Management Office  
Health Sector IM/IT Division  
*BC Ministry of Health*

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**Lucas, Janet HLTH:EX**

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**From:** Thambirajah, Natasha HLTH:EX  
**Sent:** Sunday, May 29, 2011 8:58 PM  
**To:** Gale, Catherine HLTH:EX; Lucas, Janet HLTH:EX; Moss, Jeremy HLTH:EX  
**Subject:** Times Colonist Editorial Piece May 28, 2011

New CareCard and our privacy

Times Colonist May 28, 2011

Page 351 redacted for the following reason:

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## Lucas, Janet HLTH:EX

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**From:** Moss, Jeremy HLTH:EX  
**Sent:** Thursday, June 9, 2011 12:48 PM  
**To:** Lucas, Janet HLTH:EX  
**Cc:** Gale, Catherine HLTH:EX  
**Subject:** FW: Media request

FYI

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**From:** Moss, Jeremy HLTH:EX  
**Sent:** Thursday, June 9, 2011 11:43 AM  
**To:** Power, Stephanie A HLTH:EX  
**Cc:** Bell, Carolyn P HLTH:EX  
**Subject:** Re: Media request

Hi steph,

No, the cards do not contain rfid chips. The do contain contactless (near field?) Chips. The ocio - ian bailey, patricia wiebbe or peter watkins) could provide more info. Rfid has longer range than contactless. However, even contactless could be read by "scanners" (people rubbing a reader up against your purse or wallet). Important point to remember is that, unlike credit cards, our chip will contain no personal information, not even your phn. It will contain only a secure, encrypted identifier that can be used to access a secure govt database, for authorized purposes and services, to confirm client identity and eligibility for services.

Very low risk here. And cards can be flagged as lost or stolen. Even if u could scan someones chip, trying to use the info is very, very difficult, and trying to duplicate our new card and chip would also be very hard. Should be much more secure than the current card or bank/credit cards. But I encourage you to contact the OCIO for more info/clarification. They are the experts on this technology.

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**From:** Power, Stephanie A HLTH:EX  
**Sent:** Thursday, June 09, 2011 11:27 AM  
**To:** Moss, Jeremy HLTH:EX  
**Cc:** Bell, Carolyn P HLTH:EX  
**Subject:** Media request

Hi Jeremy,

Just got a request from the PAB folks...

See outline below....

CTV is doing a story on credit cards, passports, drivers licenses and other cards that include radio frequency ID (RFID) technology in the microchip. It seems the premise of the story is that this makes the cards vulnerable to someone reading your data and information.

Will our new cards include RFID technology (I'm thinking all chips do)?

If so, what is the security risk if any?



What are we doing to protect patient info (IE, will this lead to additional fraud if this info can be stolen and reproduced)?

Should I get the information on the specs from you or....????

Let me know and I will follow up.

Stephanie

Stephanie Power

Director, Care Card Transformation and Change Management

Office of the Assistant Deputy Minister

Health Sector IMIT Division

Ministry of Health

Tel: 250-952-1481

Email: [stephanie.power@gov.bc.ca](mailto:stephanie.power@gov.bc.ca)

Pages 354 through 355 redacted for the following reasons:

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