

**Russell, Shannon CITZ:EX**

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**From:** Russell, Shannon CITZ:EX  
**Sent:** Wednesday, May 9, 2018 11:21 AM  
**To:** Delaney-Spindler, Chelsea CITZ:EX  
**Subject:** Letter  
**Attachments:** 2018-05-09 Letter to Mike de Jong.docx

**Importance:** High

Please print off the attached letter and I'll get the Minister to sign it then have you walk it down to MLA de Jong.

Thanks,  
Shannon

**Shannon Russell**  
*Senior Ministerial Assistant to Jinny Sims*  
*Minister of Citizens' Services*  
[Shannon.Russell@gov.bc.ca](mailto:Shannon.Russell@gov.bc.ca) / 250-387-9699

May 9, 2019

Ref: 108538

Michael de Jong, QC, MLA  
Abbotsford West  
Parliament Buildings  
Victoria BC V8V 1X4

Dear MLA de Jong:

I am writing in response to the questions you raised during the estimates for the Ministry of Citizens' Services with respect to the webpages associated with the September 2017 Speech from the Throne.

I have consulted closely with staff at Government Communications and Public Engagement (GCPE) and am pleased to provide you with the following information based on those discussions.

The *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires GCPE to conduct a Privacy Impact Assessment (PIA) on any new enactment, system, project, program or activity. The long-established practice at GCPE includes conducting a PIA when a new program is launched, or when substantive changes are made to an existing program for which a PIA was previously completed.

These practices exist to ensure that GCPE complies with its obligations under FOIPPA. Any program or initiative undertaken by GCPE must follow the strict guidelines of FOIPPA. This includes, but is not limited to: providing notification when personal information is collected; safeguarding information that has been collected, including ensuring limited access to the information; and ensuring no more information is collected than is necessary.

The information gathered cannot be used or disclosed for any purpose other than those outlined in the legislation. GCPE's work must comply with FOIPPA.

The specific case you referenced during estimates was related to the BetterBC webpages. GCPE operated the BetterBC webpages beginning on September 8, 2017; the pages were taken off-line in mid-February. The pages were designed to create awareness about the 2017 Speech from the Throne and – through an e-mail sign-up form – give visitors an opportunity to be advised on how they could provide input to the 2018 budget.

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The only data captured during this initiative were email addresses. While it was anticipated that the addresses would be used to inform subscribers of a 2018 budget consultation, ultimately that portion of the initiative was not implemented. The email addresses were not used for any purpose or disclosed to any party and have since been disposed of.

A PIA was completed for the content management system used to create the website in question. That PIA contemplated the two-way exchange of information between GCPE and visitors to the website.

As the former Minister responsible for FOIPPA, you will be familiar with these “Corporate PIAs”, which require both a one-time general assessment of a tool or process, and then a subsequent “PIA checklist” for a specific application of that tool. This approach streamlines the privacy compliance process by allowing ministries to complete a targeted checklist instead of a full privacy impact assessment each time they use the tool, to confirm privacy compliance.

Because the Corporate PIA applied to this activity, the PIA checklist should have been completed to confirm that the Throne Speech engagement was compliant. In this case, a “PIA checklist” was not completed before the Throne Speech engagement was launched. In spite of this, the initiative was consistent with the requirements of FOIPPA, and the overarching Corporate PIA was in place.

In short, this particular situation was a matter of staff administrative oversight only. We have confirmed that GCPE followed FOIPPA practices for this program.

You raised a concern that GCPE was “collecting information with respect to the Throne Speech and then making use of it with respect to an entirely different activity of government.” This statement is incorrect.

In fact, individuals who visited a government webpage seeking information on the Throne Speech were asked whether they wished to receive information on the Budget, and were offered the opportunity to “sign up” by providing their email address. This information was gathered with their knowledge. They were told the purpose of this collection, and any individual who did not wish to provide an email address for this purpose was not obligated to do so in order to receive information on the Throne Speech. This practice is entirely consistent with FOIPPA.

This case was before the Ministerial Orders were signed. Even if GCPE had been confirmed as a “common program” at the time that this initiative was planned and launched, this initiative would not have utilized the “common or integrated program or activity” authorities. Furthermore, as discussed at Estimates, the “common or integrated program or activity” authorities do not apply to the use of personal information by a public body, or to direct collections of personal information from individuals.

Michael de Jong, QC, MLA  
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As discussed in Estimates, the Ministerial Order does not authorize the collection, use, or disclosure of personal information. The Order simply confirms that GCPE is a “common program” for the purposes of FOIPPA. As a common program, GCPE is able to use specific indirect collection and disclosure authorities in the Act when they work with – or on behalf of – other ministries or agencies to deliver services to the public or government. This Order is a fundamental building block towards ensuring the information collected, used and disclosed by GCPE in these circumstances is consistent with privacy principles and authorized by FOIPPA.

I want to acknowledge GCPE’s – and all of government’s – commitment to a strong culture of privacy and ongoing efforts to meet the requirements of FOIPPA. Ministry of Citizens’ Services staff will continue to support all of government’s work to meet its requirements under FOIPPA, in particular with respect to PIAs, and to further strengthen its practices through staff awareness and training.

Sincerely,

Jinny Jogindera Sims  
Minister

cc: Evan Lloyd

Russell, Shannon CITZ:EX

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**From:** Russell, Shannon CITZ:EX  
**Sent:** Tuesday, May 1, 2018 11:21 AM  
**To:** Delaney-Spindler, Chelsea CITZ:EX  
**Subject:** RE: Records Management Training

Excellent – thank you!

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**From:** Delaney-Spindler, Chelsea CITZ:EX  
**Sent:** Tuesday, May 1, 2018 11:21 AM  
**To:** Russell, Shannon CITZ:EX  
**Subject:** Records Management Training

Hi Shannon,

I just accepted the invitation for the course.

Thank you,

**Chelsea Delaney-Spindler**  
*Administrative Assistant*  
Ministry of Citizens' Services  
250-387-9699

**Subject:** FW: RECORDS MANAGEMENT IM117  
**Location:** s.15  
  
**Start:** Thu 2018-05-03 2:00 PM  
**End:** Thu 2018-05-03 3:30 PM  
**Show Time As:** Tentative  
  
**Recurrence:** (none)  
  
**Meeting Status:** Not yet responded  
  
**Organizer:** Parte, Maura PSA:EX

Please register for this course.

Thanks,  
Shannon

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

**From:** Parte, Maura PSA:EX  
**Sent:** Tuesday, May 1, 2018 10:55 AM  
**To:** Parte, Maura PSA:EX; LP Support Staff; LP Administrative Coordinators; LP Senior Ministerial Assistants; LP Ministerial Assistants; Clark, Layne PREM:EX; Hendry, Jackie PREM:EX  
**Subject:** RECORDS MANAGEMENT IM117  
**When:** Thursday, May 3, 2018 2:00 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).  
**Where:** s.15

Records Management IM117 is being offered this Thursday, May 3 from 2pm to 3:30pm for any interested staff in Ministers' offices and the Office of the Premier.

We have new employees who haven't taken the course yet so please allow for everyone to organize their schedules so they can attend. It is mandatory for all employees.

Most of you have completed the course but you are also welcome to attend.

The course will cover best practices for records management and expectations with regards to FOI.

Please call me if you have any questions.

Thank you,  
Maura

## **Fleurant, Kathleen CITZ:EX**

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**From:** Riley, Karl CITZ:EX  
**Sent:** Friday, March 23, 2018 1:01 PM  
**To:** Delaney-Spindler, Chelsea CITZ:EX  
**Subject:** RE: CITZ Ministry Records Officer Information

Thanks

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**From:** Delaney-Spindler, Chelsea CITZ:EX  
**Sent:** Friday, March 23, 2018 12:33 PM  
**To:** Riley, Karl CITZ:EX  
**Subject:** RE: CITZ Ministry Records Officer Information

Absolutely. I'll let you know the outcome.

Kindly,  
Chelsea

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**From:** Riley, Karl CITZ:EX  
**Sent:** Friday, March 23, 2018 12:28 PM  
**To:** Delaney-Spindler, Chelsea CITZ:EX  
**Subject:** RE: CITZ Ministry Records Officer Information

Thanks Chelsea. Can you please check with the Records Branch and see what they say?

Best,

Karl

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**From:** Delaney-Spindler, Chelsea CITZ:EX  
**Sent:** Friday, March 23, 2018 11:26 AM  
**To:** Riley, Karl CITZ:EX  
**Subject:** RE: CITZ Ministry Records Officer Information

Hi Karl,

Physical filing was actually one of my questions when I ran my original survey. None of the offices I spoke with officially kept any hard-copy originals in the office. They were sent to their correspondence division/DMO, or shredded after being filed on Cliff. The only time any of the offices kept on hand copies was when they would need to refer back to it within a short amount of time.

Please let me know if you'd like me to ask around again.

Kindly,  
Chelsea

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**From:** Riley, Karl CITZ:EX  
**Sent:** Friday, March 23, 2018 10:41 AM

**To:** Delaney-Spindler, Chelsea CITZ:EX  
**Subject:** FW: CITZ Ministry Records Officer Information

Hi Chelsea,

Can you please get in touch with the Government Records Branch, and canvass other Minister's Offices, to see how they store hard-copy originals of incoming correspondence?

Specifically, I would like to know if we are supposed to keep them in our office, keep them in the DMO, or if in we can just scan them and log them CLIFF? Or maybe there is some other process that I don't know about.

If you have any questions on this, please feel free to give me a call.

Thanks,

Karl

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**From:** Cook, Jeannette CITZ:EX  
**Sent:** Thursday, March 22, 2018 10:27 AM  
**To:** Riley, Karl CITZ:EX  
**Subject:** CITZ Ministry Records Officer Information

Hi Karl,

Sharing the Ministry contact at the government records branch – Sarah Johnson. She would be able to answer any questions you may have.

## Citizens' Services

Sarah Johnson, Records Officer

Phone: 250 356-7329

Email: [GRS@gov.bc.ca](mailto:GRS@gov.bc.ca)

<https://www2.gov.bc.ca/gov/content/governments/services-for-government/information-management-technology/records-management/records-contacts/ministries>

Thx.  
JC



## **Fleurant, Kathleen CITZ:EX**

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**From:** Riley, Karl CITZ:EX  
**Sent:** Tuesday, October 3, 2017 4:04 PM  
**To:** Sanders, Trent CITZ:EX; Fleurant, Kathleen CITZ:EX  
**Subject:** RE: FOI Training for Karl Riley

Thanks.

10am on Thursday it is.

Best,

Karl

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**From:** Sanders, Trent CITZ:EX  
**Sent:** Tuesday, October 3, 2017 4:04 PM  
**To:** Riley, Karl CITZ:EX; Fleurant, Kathleen CITZ:EX  
**Subject:** RE: FOI Training for Karl Riley

Hey Karl,

My session went for roughly an hour.

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**From:** Riley, Karl CITZ:EX  
**Sent:** Tuesday, October 3, 2017 4:03 PM  
**To:** Sanders, Trent CITZ:EX; Fleurant, Kathleen CITZ:EX  
**Subject:** RE: FOI Training for Karl Riley

Hi Trent,

10am on Thursday would work. How long is the training?

Thanks,

Karl

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**From:** Sanders, Trent CITZ:EX  
**Sent:** Tuesday, October 3, 2017 3:47 PM  
**To:** Riley, Karl CITZ:EX; Fleurant, Kathleen CITZ:EX  
**Subject:** FW: FOI Training for Karl Riley

Here is the scheduling for FOI training with Jennifer Peddle over the next two weeks.

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**From:** Peddle, Jennifer MTIC:EX  
**Sent:** Tuesday, October 3, 2017 3:46 PM  
**To:** Sanders, Trent CITZ:EX  
**Subject:** RE: FOI Training for Karl Riley

Hi Trent,

I'd be happy to schedule some training for the Minister's new assistant.

Here's my availability for the next two weeks, let me know when works and I'll book a room over here, or I can come over to your office whichever works best:

- Tomorrow - Wednesday October 4<sup>th</sup>
  - Any time before 12:30
- Thursday October 5<sup>th</sup>
  - All day
- Wednesday October 11
  - All day
- Thursday October 12
  - Any time after 13:00
- Friday October 13
  - All day

Hopefully, we can find a time that works in one of those blocks,

Jennifer Peddle, MSc | Information and Privacy Coordinator | Deputy Minister's Office | Ministry of Citizens' Services  
Ph: 250 387-2675 | e: [Jennifer.Peddle@gov.bc.ca](mailto:Jennifer.Peddle@gov.bc.ca) | m: PO Box 9440, Stn Prov Govt, Victoria, BC V8W 9V3

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**From:** Sanders, Trent CITZ:EX  
**Sent:** Monday, October 2, 2017 14:38  
**To:** Peddle, Jennifer MTIC:EX  
**Subject:** FOI Training for Karl Riley

Hi Jennifer,

I've been asked to arrange FOI training for the Minister's new assistant. Is there some time that works for you this week or next?

Thanks,

**Trent Sanders**  
**Administrative Assistant – Minister's Office**  
Ministry of Citizens' Services  
**Phone:** 1-250-387-9699  
**Email:** [Trent.Sanders@gov.bc.ca](mailto:Trent.Sanders@gov.bc.ca)