

**INFORMATION ACCESS OPERATIONS
LIST OF CORE SERVICES TO PUBLIC BODY
CLIENTS**

NOTE: Reflects core services derived from *Target IAO Business Operations Design, May 2009*

FREEDOM OF INFORMATION

BUSINESS PROCESS	ACTIVITY	DESCRIPTION	CLIENT RESPONSIBILITIES	SERVICE LEVEL
FOI Access request and consultation processing:	Receive FOI requests and consultations	Receive incoming mail, including requests; monitor and manage corporate email and fax accounts; date stamp and distribute incoming requests	Identify and forward FOI requests without delay	As required
	Validate requests	Confirm and acknowledge valid requests for records; establish eligibility or authorization for access to personal records	Provide or make available all relevant validation/eligibility records/information	As required
	Triage Requests	Contact applicants to clarify requests; redirect or transfer requests to appropriate jurisdictions; liaise with client public body to identify records available through routine release	Provide program specific information and assistance to IAO staff and/or applicants as required	As required
	Track requests	Log incoming requests and consultations into ATIPxpress; track requests through lifecycle	N/A	As required
	Correspondence management	Manage all FOI related correspondence, including; acknowledgement, clarification, fee, extension and response letters	N/A	As required
	Coordinate requests	Coordinate similar or identical requests received by multiple public bodies for administrative efficiency; this includes cross government requests	Advise IAO if aware of multiple public body requests	As required
	Assign requests and consultations	Ensure public body program areas have all relevant information, including; request/consultation number, description, due date, forms and contact information	Where practical or appropriate, designate a single point of contact for receipt of IAO records calls. Confirm primary responsibility areas for records; re-direct where appropriate	As required

	Manage FOI fees	Calculate and issue fee estimates; receive, process, track and deposit fees; process, track and issue refunds	Provide accurate and timely records search, volume and/or preparation for disclosure estimates	As required
	Manage fee waiver requests	Receive, process and track fee waiver requests; review and analyze fee waiver requests and records or record samples in order to prepare fee waiver recommendations, or make fee waiver decisions if delegated to do so	Provide program-specific information and/or records context to facilitate development of waiver recommendations; provide record samples as required	As required
	Manage time extensions	Issue and track public body extensions; prepare and submit requests to the Office of the Information and Privacy Commissioner (OIPC) for additional extensions; negotiate 10 (1)(d) extensions with the applicant when appropriate; track all extensions	Provide any relevant information required to justify extensions	As required
	Receive responsive records	Define, clarify and/or narrow scope of requested records with program areas and/or applicants; receive records by mail, courier, fax or, preferably, electronic means; scan non-electronic records into digital format for processing, storage and retention	Make all reasonable efforts to identify, locate and retrieve responsive records; document all records searches; forward all responsive records in a timely manner; forward all records in electronic format wherever possible and practical	As required
	Review records for disclosure	Review records for scope and responsiveness; review program area disclosure recommendations and harms assessments; consult with program areas as required; identify records requiring consultation with other public bodies, organizations or third parties; issue and process consultations and/or formal third party notifications; review precedents; apply mandatory exceptions; prepare severing recommendations for discretionary exceptions; sever records	Provide program-specific information and records context to facilitate review and analysis; provide informed disclosure recommendations, including harms assessments where required	As required
	Prepare disclosure recommendations	Prepare disclosure recommendations for delegated sign-off authority; prepare electronic “red-line” draft of records for review; complete and forward approval form to single point of contact	Designate single point of contact for receipt of disclosure recommendations and approval forms; accept electronic sign-off packages wherever possible and practical	As required

	Process external consultations	Forward external consultation records to program area for review and recommendations; forward recommendations to external authority for decision	Provide disclosure recommendations	As required
	Release records	Prepare hard-copy or electronic release packages; mail or courier hard-copy records or discs; email electronic records	N/A	As required
Requests to correct personal information	Requests to correct personal information	Receive, track, document and provide recommendations, or make decisions where delegated to do so, regarding correction or annotation of personal information under s. 29	Forward requests for correction to IAO and annotate or correct information when required	As required
Manage OIPC Complaints, Reviews, Investigations, Inquiries and Judicial Reviews	Represent client public bodies when applicant or third party complaints are submitted to OIPC	Receive, process and track complaints to OIPC; participate in OIPC mediation; work with applicants, OIPC and program areas to resolve complaints	Provide program-specific information and records context to facilitate mediation; Maintain accurate fee estimate and record search documentation	As required
	Represent client public bodies when applicant or third party review requests are submitted to OIPC	Receive, process and track reviews with OIPC; participate in OIPC mediation; work with applicants, OIPC and program areas to resolve reviews	Provide program-specific information and records context to facilitate mediation; review decisions as required	As required
	Represent client public bodies subject to OIPC investigation	Participate in OIPC investigations; assist program areas when and as required	Provide program-specific information and records context in response to investigations	As required
	Represent client public bodies when applicant or third party complaints or reviews result in formal Inquiries	Work with program areas and Legal Services to prepare submissions for Inquiries; provide affidavits and/or other evidentiary materials as required; assist client public bodies to comply with any Orders resulting from Inquiries.	Provide program-specific information and records context to support submissions; provide program area expertise and/or affidavits as required.	As required
	Represent client public bodies in judicial review proceedings	Work with program areas and Legal Services to prepare submissions for judicial reviews; provide affidavits and/or other evidentiary materials as required; assist client public bodies to comply with any judgments resulting from judicial reviews.	Provide program-specific information and records context to support submissions; provide program area expertise and/or affidavits as required	As required

FOI Advisory Services	Advise program staff and Public Body Executive on all FOI matters	Prepare briefing materials as required; advise staff on access and disclosure issues and/or FOI interpretations; provide operational policy and procedural advice; provide for a positive duty to assist applicants; provide research and analysis to support public body pro-active or routine disclosure	N/A	As required
FOI Reporting	Executive FOI Reports	Provide weekly FOI reporting to all client public bodies; provide ad-hoc reporting as capacity and data permit	Identify reporting requirements	As required
	OIPC Reports	Provide “report card” data and other FOI reporting to OIPC on behalf of client public bodies	N/A	As required
	Annual and quarterly FOI reporting	Publicly post quarterly and annual FOI statistics on behalf of client public bodies	N/A	As required

PROVINCE OF BRITISH COLUMBIA

ORDER OF THE MINISTER OF CITIZENS' SERVICES

Freedom of Information and Protection of Privacy Act

Ministerial Order No.

I, Jinny Jogindera Sims, Minister of Citizens' Services make the following order under s. 12 (b) of the Freedom of Information and Protection of Privacy Regulation, B.C. 155/2012:

That the Corporate Information and Records Management Office (CIRMO), under the Office of the Chief Records Officer, Ministry of Citizens' Services, is a common program for the purposes of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

1)

- a) CIRMO is responsible for providing access to information services under or on behalf of all ministries of the Government of British Columbia ("Ministries" or "Ministry"):
- i. reviewing records determined by the ministry to be responsive to requests for access under FOIPPA (FOI requests), or records provided by Ministries pursuant to a Ministerial Directive under section 71.1 of FOIPPA;
 - ii. providing disclosure recommendations to the Ministry;
 - iii. providing front line services to applicants, including responding to request queries, seeking and providing clarifications or extensions of time limits for response;
 - iv. severing records as required or appropriate pursuant to Part 2 of FOIPPA or a Ministerial Directive issued under section 71.1 of FOIPPA;
 - v. transferring records to, or consulting with, Ministries or third parties as required;
 - vi. calculating and issuing fee estimates;
 - vii. receiving, processing and tracking payment of fees and refunds;
 - viii. processing fee waiver requests and making recommendations with respect to accepting or denying fee waiver requests;
 - ix. managing all Freedom of Information (FOI) related correspondence to applicants;
 - x. responding to reviews/inquires by the Information and Privacy Commissioner for British Columbia (IPC);
 - xi. tracking and monitoring FOI requests and documenting the FOI access request process from inception to completion in order to facilitate reporting/statistics to Ministries or the IPC;
 - xii. facilitating compliance with FOIPPA by Ministries;

14th Feb. 2018
Date

Jinny Sims
Minister of Citizens' Services

(This part is for administrative purposes only and is not part of the Order.)

Authority under which Order is made:

Act and section: Freedom of Information and Protection of Privacy Regulation, Section 12(b)

Other: _____

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- xiii. coordinating similar or identical FOI requests received by multiple Ministries for administrative efficiency; and
 - xiv. facilitating proactive disclosure of records pursuant to a Ministerial Directive issued under section 71.1 of FOIPPA.
- b) CIRMO is responsible for providing Information Incident and Compliance services on behalf of Ministries and public bodies bound by the Core Policy and Procedures Manual ("Core Policy") including:
- i. coordinating, investigating and resolving information incidents as defined in Chapter 12 of Core Policy, which includes actual or suspected privacy breaches and privacy complaints;
 - ii. investigating allegations that a Ministry has not complied with its obligations under FOIPPA; and
 - iii. investigating allegations that there has been a contravention of the *Information Management Act* (IMA) and/or applicable records management policies.
- c) CIRMO is also responsible for conducting audit and compliance review activities to assess compliance with FOIPPA, IMA, and related government policy and procedures for Ministries and public bodies bound by Core Policy.
- 2) In order to fulfill its responsibilities as listed above, CIRMO may use and disclose all types of personal information held by the Ministries or those public bodies bound by Core Policy it serves.
- 3) The objectives and benefits of the services provided by CIRMO include:
- a) assisting Ministries in meeting their obligations under Part 2 of FOIPPA;
 - b) supporting the implementation of the Open Information and Open Data Policy;
 - c) supporting government transparency by ensuring services are provided in a timely, consistent and efficient manner;
 - d) providing a centralized place for the public to submit FOI access requests;
 - e) providing streamlined, efficient, consistent and cost effective service for government;
 - f) facilitating openness and accountability;
 - g) ensuring information incidents, including privacy breaches and complaints, are swiftly and adequately managed, contained, and remediated;

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- h) developing prevention strategies and issuing recommendations to assist government in dealing with and avoiding future information incidents;
 - i) ensuring overall compliance with FOIPPA, IMA and related government policy and procedures;
 - j) a centralized intake process, providing a central point of contact for individuals to report all information incidents, including privacy breaches and complaints, and allegations of non-compliance under FOIPPA, IMA and related government policy and procedures;
 - k) providing specialized support and expertise regarding the steps to effectively coordinate, investigate and resolve information incidents, including privacy breaches and complaints, and allegations of non-compliance under FOIPPA, IMA and related government policy and procedures; and
 - l) providing centralized mechanisms to audit and conduct compliance review activities on public sector compliance with FOIPPA, IMA and related government policy and procedures.
- 4)
- a) The roles and responsibilities of Ministries served by CIRMO for the purpose of providing access to information include:
 - i. determining records responsive to a request for access;
 - ii. conducting a thorough search and providing any and all records responsive to a request for access to Information Access Operations (IAO), in a timely fashion, subject to any applicable legal requirements;
 - iii. providing assistance to CIRMO in determining whether any exceptions to the disclosure of information apply to information in a record;
 - iv. making reasonable efforts to assist applicants openly, accurately and completely;
 - v. providing records in the manner and according to the timelines required by a Ministerial Directive issued under section 71.1 of FOIPPA, or policy set by IAO;
 - vi. making final decisions by the head of the Ministry, respecting access responses, fee waiver approvals and other statutory decisions required to be made under FOIPPA;
 - vii. working/cooperating with CIRMO in resolving/addressing reviews/inquiries by the Office of the Information and Privacy Commissioner (OIPC);
 - viii. complying with orders of the OIPC; and
 - ix. providing information and support to CIRMO as appropriate.

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- b) The roles and responsibilities of Ministries and public bodies bound by Core Policy that are served by CIRMO for the purpose of addressing information incidents, compliance, and audit issues include:
- i. immediately reporting to CIRMO, any actual or suspected information incident;
 - ii. taking appropriate action, as recommended by CIRMO, to contain and resolve an information incident to limit its impact;
 - iii. making reasonable efforts to cooperate fully with CIRMO investigators, providing any information and/or records required where necessary for the purposes of an investigation being conducted by CIRMO;
 - iv. ensuring evidence of an information incident or other event under investigation by CIRMO is preserved and details are properly documented;
 - v. determining whether to notify individuals affected by a privacy breach, in consideration of recommendations issued by CIRMO;
 - vi. implementing any and all recommendations from CIRMO in order to prevent a similar incident from occurring again in future; and
 - vii. working with CIRMO in resolving reviews and inquiries by OIPC.

5) This order is effective as of February 14, 2018.