



Privacy Impact Assessment for Emergency Support Services (ESS)

PIA# PSSG19013

Part 1 – General

Name of Ministry:	Public Safety and Solicitor General, Emergency Management BC		
PIA Drafter:	Melia Walker, Director, Mass Care and Emergency Support Services		
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Program Manager:	Stan Bates, A/Executive Director, Operations		
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1. Description of the Initiative

Emergency Management BC (EMBC) is the Province's lead coordinating agency for all emergency management activities, including planning, training, testing and exercising, to help strengthen provincial preparedness.

British Columbians forced from their homes by fire, floods, earthquakes or other emergencies may receive emergency support services (ESS). Services may include food, lodging, clothing, emotional support, information about the crisis, and family reunification. There may also be special services like first aid, child minding, pet care and transportation.

Under the *Emergency Program Act*, each municipal council and regional district that qualifies as a local authority must, as part of the local emergency plan, coordinate the provisions of food, clothing, shelter, transportation and medical services to victims of emergencies and disasters, whether that provision is made from within or outside of the local authority while EMBC is responsible for providing the provisions of food, clothing, shelter, and transportation to those same evacuees.

Local authorities coordinate ESS jointly with EMBC by way of Public Safety Lifeline Volunteers (PSLV). The ESS PSLVs are considered employees of EMBC as per Schedule 1 of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) as the PSLVs are registered, trained and provided liability insurance by the Province when deployed under an EMBC Task# to administer ESS. Additionally, EMBC reimburses volunteers for any travel related expenses incurred during a deployment outside of their jurisdiction (i.e. Mileage or other modes of transportation, meal per diem and accommodations).

ESS PSLV teams register evacuees, conduct needs assessment and administer referrals to evacuees for procurement of goods and services to support the evacuees' needs while displaced. Each year about 5,000 British Columbians volunteer as ESS workers and are registered as PSLVs.



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As part of an EMBC modernization project, EMBC will be launching an OpenShift online application portal for evacuees to submit an ESS registration. Evacuees will have two options to register for ESS. They will have the ability to self-register using a public facing portal and will have the option of engaging with a PSLV who will assist them in completing the form using the portal.

In the case of the self-registration, once it is submitted by the evacuees, the EMBC ESS system will send a confirmation email to the applicant with an ESS file number and instructions to contact the ESS PSLV team to complete the registration process. The ESS PSLVs will log into the portal using their BCeID and assist the evacuees with completing the ESS registration.

Once the ESS registration is complete, the ESS PSLVs will assess the evacuees needs and create a referral for goods and services in the EMBC ESS system, if applicable. If needed, the referral will be printed and provided to the registrant, who will use the form to acquire the goods and services needed.

In order to assist in the coordination of the emergency, local governments (i.e. municipalities, First Nations and regional districts) will require some information from the ESS system and will access the required specific information by logging into the ESS system using their Business BCeID.

Although the plan is for the registration and the relevant data to be automatically loaded into EMBC's new ESS Oracle database, that process may not be ready for the implementation of the ESS system. In the interim, the collected personal information will be stored on the OpenShift application portal.

The ESS database and portal will be installed and run on the BC Government Information Technology Infrastructure (i.e. on-premise). Information Systems Branch of the Ministry of Attorney General will maintain the EMBC ESS database.

In the finalized infrastructure, the information provided through the portal will only be preserved within the database. The portal will be broken down into a number of screens that will be completed in any order. There will be a number of screens and each one will correspond to a specific piece of data (e.g. name, address, family unit). The system will make an application programming interface (API) call to write the information into the EMBC ESS database every time a user will move between screens. There will be no local catching of data within the portal. The portal will not copy or store any information and will only be a conduit to the database.

OIPC Request for Authorization

Depending on the scope of the emergency, when people are forced to evacuate their homes, the ESS program may direct them to ad-hoc reception centres such as community centres, recreation centres, churches or schools, established specifically to support evacuees.



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A reception centre is a safe place where people can go to receive accurate and up-to-date information about the emergency, help planning their recovery from the disaster, and register for ESS.

As the ESS need assessments are done at a household level, all the individual members of that household are connected in the EMBC systems and only one ESS file is used to register all immediate family members who live within the same household.

The circumstances in which evacuations take place are varied resulting in instances in which a head-of-household or a family representative will need to register the members of their household even though these members may not be present at the time of the ESS registration.

There might be circumstances in which members of the household/family may not arrived at the ESS reception centre at the same time or some members of the household may be receiving first aid and other health services, or others may have predisposed conditions that may be impacted by waiting in line for hours.

Additionally, for large emergencies, asking head of households or a family representative to register the household streamlines the process and minimizes the length of wait time for evacuees to register in this already stressful environment.

In order for EMBC to fulfill its mandate, it will be required to indirectly collect the personal information of members of a household from the head of the household or a family representative. Note that the Commissioner's authorization would only apply to the personal information listed in the attached registration form.

As part of the privacy assessment, EMBC identified a gap in their authority to collect the information indirectly and will be pursuing a change the *BC Emergency Program Act*. In the meantime, under section 42(1)(i) of the *Freedom of Information and Protection of Privacy Act* (FolPPA), EMBC is asking the Information and Privacy Commissioner for authorization for the indirect collection of the personal information of members of a household. Note that the Commissioner's authorization would only apply to the personal information listed in Question 4.

Note that as per section 3 of the *Freedom of Information and Protection of Privacy Regulation*, a guardian of a minor may act for the minor and provide personal information for the minor as part of this registration process under section 27(1)(a)(i) of FolPPA if the minor is too young to do so themselves.



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2. Scope of this PIA

The PIA will assess the privacy implication of the ESS program. Note that the PSLV program, including the recruiting, training and management of volunteers will be outside of the scope of this PIA.

3. Related Privacy Impact Assessments

CITZ18019 - BC DevOps OpenShift Service.

4. Elements of Information or Data

The following information will be collected from the evacuees and ESS volunteers through the ESS portal:

- Evacuee's first and last name
- Nickname
- Contact information (i.e. Permanent and post disaster addresses, phone number(s), email)
- Place, time and date of the ESS registration
- Goods and services provided to the evacuees
- Family composition
- Pets
- Security or vulnerability concerns
- Impacts on the evacuees and family recovery plans
- Demographic (i.e. date of birth, gender, relationship to head of household)
- Special needs (i.e. medical information, dietary needs, etc.)
- File and Task number (i.e. EMBC control number to enable tracking of approved response)
- Incident number (i.e. EMBC event number)
- ESS volunteer's First and Last Name and BCeID
- Whether the evacuee has insurance that may cover immediate needs.
- Other agency referrals made outside reception centre

As part of the need assessment, the ESS volunteer will create a referral form which will include the following information and will be printed and provided to the evacuees to procure the goods and services from identified vendors:

- Family name and representative and potentially the name of the person who will be procuring the goods and services for that family
- Suppliers' contact information;
- Quantity and types of goods and services that the evacuees are eligible for (i.e. groceries, lodging, etc.);
- Valid Dates for services to be received; and
- General comments (i.e. misc. items or concerns or additional relevant information).



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Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

All personal information stored or located on EMBC ESS Oracle database, the portal, the Exchange Web Services (EWS) system will be located within the BC Government infrastructure located on Canadian data centres and will only be accessed within Canada.

6. Data-linking Initiative*

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act.	
1. Personal information from one database is linked or combined with personal information from another database;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	n/a
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	n/a

7. Common or Integrated Program or Activity*

In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act.	
1. This initiative involves a program or activity that provides a service (or services);	Yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	Yes
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No



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8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Citizens of BC in an emergency or an event that will displace citizens from their primary residence will have the ability to register themselves as well as all members of their household for ESS through the EMBC ESS public portal.	Collection	26(c) 27(1)(a)(ii)
2.	The ESS system will create a file number and email the evacuee the file number and request that they contact an ESS volunteer to complete the ESS registration and receive support. Note that evacuees using the self-serve registration system will be advised that their email address will be used to contact them and provide them with their ESS file number.	Use Disclosure	32(a) 33.1(7)
3.	The evacuee will then contact the ESS volunteer and provide the additional required information. It is possible this additional information may be third party information about members of the evacuee's household.	Collection	26(c) 27(1)(a)(ii)
4.	Some individuals may request assistance with registering for ESS and may provide the information directly to an ESS volunteer to enter into the system. Note that ESS volunteers will use their BCeID to log into the system.	Collection Use	26(c) 27(1)(a)(ii) 32(a)
5.	The ESS volunteer will conduct a needs assessment of the goods and services that the evacuee is eligible for and provide the evacuee with a referral to receive such services	Use Disclosure	32(a) 33.2(a)
6.	To assist in the coordination of the emergency EMBC will provide access to some of the information in the ESS EMBC system to local governments who will be using their local government BCeID to log in.	Disclosure	33.2(a) and (l)
7.	As part of the coordination of the emergency, the local governments will manage the access by the PSLVs to the ESS EMBC system and may add new user to the system.	Collection	26(c) and (e) 27(1)(b) [33.2(a)]
8.	ISB will access the personal information to maintain install, implement, repair, trouble shoot or upgrade the EMBC ESS database.	Disclosure (EMBC)	33.1(1)(p)

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Version 1.0



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		Collection (ISB)	26(c) and (e) 27(1)(b)
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9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	EMBC Employees could access personal information and use or disclose it for personal purposes.	Oath of Employment Privacy Training Standards of Conduct Criminal Background Checks	Low	High
2	PSLVs or Local governments could access personal information and use or disclose it for personal purposes.	EMBC System User Agreement.	Low	High
3.	Evacuees' personal information is compromised when transferred to the local governments.	Local governments will have direct access to the application using their Business BCeID.	Low	High
4.	Evacuees' personal information is compromised when transferred between the portal and the EMBC ESS database.	The data flow between the portal and EMBC ESS database will use a service account with a secret key (application key) which will create, update, and view objects within EMBC ESS database, and application programming interface (API) calls from the portal to EMBC ESS database will be done via CA API Gateway. The data flow between portal and the Oracle database will be done using a 2-way Transport Layer Security (TLS) and the connection will be routed via CA API Gateway.	Low	High



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		More information can be found in the relevant STRAs.		
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10. Collection Notice

The following collection notice will be provided to evacuees when they log into the portal and when authenticating by an alternative measure on the associated form:

"Emergency Management BC (EMBC) will collect your personal information for the purpose of providing you with emergency services in accordance with section 26(c) of the Freedom of Information and Protection of Privacy Act (FolPPA). EMBC will also collect the information as per section 26(e) of FolPPA in order to evaluate the ESS program. Should you have any questions about the collection, use, or disclosure of personal information, please contact the ESS Call Centre Manager at PO Box 9201, STN PROV GOVT, Victoria, BC, V8W9J1 or by phone toll free at 1800-585-9559."

Part 3 – Security of Personal Information

11. Please describe the physical security measures related to the initiative (if applicable).

Access to the EMBC building is secured by card access on a 24 hrs basis and is monitored by video surveillance. Password protected computers are in place.

In terms of secure storage, the personal information gathered/received will be stored in the EMBC ESS database. The personal information stored as email in the EWS System and on EMBC ESS database will be stored on the BC Government infrastructure located on Canadian data centres.

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Referrals are provided to evacuees in a physical paper format and are provided to the evacuees right away.

12. Please describe the technical security measures related to the initiative (if applicable).

EMBC ESS database will be installed and run on the BC Government Information Technology Infrastructure (i.e. on prem). Information Systems Branch of the Ministry of Attorney General will develop and maintain EMBC ESS database and will manage the access to the database.



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Regarding the security of the personal information located in EMBC ESS database, workstations will be password protected, access to the database will only be provided through valid user ID and password, and BC Government firewalls as well as a security multilayered approach, which applies multiple mitigation strategies to protect resources from external and internal threats, will be used to protect the personal information. Sometimes referred to as security-in-depth or layered security, defense-in-depth is a term used to describe the layering of security countermeasures to form a cohesive security environment. The access will be restricted based on roles and responsibilities.

As for the data submitted by users through the portal, this will only be persisted within the EMBC ESS database. The portal will be broken down into a number of screens that will be completed in any order. There will be a number of screens and each one will correspond to a specific piece of data (e.g. name, address, family unit). The system will make an application programming interface (API) call to write the information into the EMBC ESS database every time a user will move between screens. There will be no local caching of data within the portal. The portal will not copy or store any information and will only be a conduit to the database.

Although the plan is for the registration and the relevant data to be automatically loaded into EMBC's new ESS Oracle database, that process may not be ready for the implementation of the ESS system. In the interim, the collected personal information will be stored on the OpenShift application portal located on the BC Government infrastructure and will have the same level of security as the ESS Oracle database. The access will only be provided through valid user ID and password and BC Government firewalls, as well as a security multilayered approach which applies multiple mitigation strategies to protect resources from external and internal threats, will be used to protect the personal information. A STRA is being developed to access the reasonability of the security of the portal.

Personal information shared between EMBC and local governments and between ESS volunteers and EMBC will be transferred through local governments and ESS volunteers having direct access to EMBC ESS database. The access will be provided through them logging into the EMBC ESS database by logging in with BCeID.

In the context of email, the EWS system is only accessible through a valid BC government user ID and password.

13. Does your branch rely on security policies other than the Information Security Policy?

No.



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14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

EMBC ESS database and portal will only be accessible through valid user ID and password, and access restriction will be a combination of role-based, record-level, and field-level security to define the overall security rights that users will have within the EMBC's application. This will provide users with access only to the appropriate levels of information that will be required to do their jobs and will categorize users by role and restrict access based on those roles. The access will be managed by the Ministry of Attorney General's Help Desk, within the Information Systems Branch.

In the context of email, the EWS system is only accessible through a valid BC government user ID and password.

15. Please describe how you track who has access to the personal information.

EMBC ESS database and portal will log which users have logged in and accessed the data.

In terms of the EWS, Microsoft Exchange generates a number of logs:

- EWS is hosted in Internet Information Services (IIS) on the Exchange server which records activity in the IIS logs. These logs are archived and retained for 13 months unless there is a litigation hold.
 - o The EWS client protocol can be used both by internal and external clients through the Reverse Proxy service, Threat Management Gateway (TMG). Connections through TMG are logged with client IP address and these logs are retained for 7 days.
- Message Transport logs include message tracking (Exchange server to Exchange server internal only) which provides a detailed record of message activity, such as sent, received date\time and message subject. These logs are archived and retained for 13 months unless there is a litigation hold.
- Exchange also produces various protocol logs for a short time on the server for troubleshooting purposes. The protocol logs age out or are deleted as space requires.



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Part 4 – Accuracy/Correction/Retention of Personal Information

- 16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the ministry notify them of the update, correction or annotation?**

If an individual request a change to his or her personal information, the information will either be corrected or annotated and if the information may have been accessed by a local government within the last 12 months, the local government will be notified of the request.

- 17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.**

Yes, the information will be used to assess whether the individual is eligible to receive ESS.

- 18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

In an emergency, it can be challenging to confirm the identity of the evacuees, especially when individuals have very little with them. ESS volunteers are trained members of the communities and have specific training to assess eligibility.

- 19. If you answered "yes" to question 17, do you have approved records retention and disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

EMBC has an approved records retention and disposition schedule that will ensure that personal information is kept for at least one year.

Part 5 – Further Information

- 20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

There will be systematic sharing of information between local governments and EMBC.



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Please check this box if the related Information Sharing Agreement (ISA) has been prepared.

Electronic
Access
Agreements
are being
developed.

Information Sharing Agreement – Required Information

Description	A regular exchange of personal information between local governments (i.e. municipalities and First Nations) and Emergency Management BC in order to provide support to eligible residents/evacuees in cases of emergencies in BC.
Primary ministry/government agency involved	Emergency Management BC
All other ministries/government agencies and public bodies involved	Municipalities and First Nations
Business contact title	Director, Mass Care and Emergency Support Services
Business contact telephone number	250-952-1035
Indication of whether or not personal information is involved	Yes
Start date	01-Apr-19
End date (if applicable)	n/a

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

22. Will a personal information bank (PIB) result from this initiative?

Yes, there will be a new PIB as a result from this initiative.

Personal Information Bank – Required Information

Description	Emergency Management BC's Emergency Support Services' case management system
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Primary ministry/government agency involved	Emergency management BC
All other ministries/government agencies and public bodies involved	Local Governments
Business contact title	Director, Mass Care and Emergency Support Services
Business contact telephone number	250-952-1035



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Part 6 – PCT Comments and Signatures

This PIA is based on a review of the material provided to PCT as of the date below. If, in future any substantive changes are made to the scope of this PIA, the ministry will have to complete a PIA Update and submit it to PCT.

Cole Lance

Privacy Analyst
Privacy, Compliance and Training
Branch
Corporate Information and
Records Management Office
Ministry of Citizens' Services

Signature

April 3, 2019

Date

Dwayne McCowan

Manager, Privacy Operations
Privacy, Compliance and Training
Branch
Corporate Information and
Records Management Office
Ministry of Citizens' Services

Signature

April 3, 2019

Date



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Part 7 – Program Area Comments and Signatures

Karine Bordua

Ministry Privacy Officer
Information Systems Branch
Ministry of Attorney General

Signature

April 3, 2019

Date

Ian Bailey

Assistant Deputy Minister and Chief
Information Officer
Information Systems Branch
Ministry of Attorney General

Signature

April 3, 2019

Date

Stan Bates

Executive Director, Response
Emergency Management BC
Ministry of Public Safety and
Solicitor General

Signature

April 4, 2019

Date

Madeline Maley

Assistant Deputy Minister
Emergency Management BC
Ministry of Public Safety and
Solicitor General

Signature

April 8, 2019

Date

PRIVACY IMPACT ASSESSMENT

Initiative Update – PSSG21042

1. Title of original PIA and any number assigned to original PIA

PSSG19013 - ESS Modernization

Additional relevant PIAs:

PSSG20002 - EMBC Response Costs PIA

2. Ministry and Program Area.

Ministry	Ministry of Public Safety and Solicitor General
Branch/Section	Emergency Management BC
Initiative Title	Emergency Support Services Modernization - Phase 2

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

Name, Title	Chrissy Oliver, Director ESS Program
Phone Number	(778) 698-7971
E-Mail	Chrissy.Oliver@gov.bc.ca

4. Description/Purpose/Objectives of the revision.

Emergency Management BC (EMBC) is the Province's lead coordinating agency for all emergency management activities, including planning, training, testing and exercising, to help strengthen provincial preparedness.

British Columbians ordered to evacuate from their homes by fire, floods, earthquakes or other emergencies may receive emergency support services (ESS). The ESS program depends on dedicated local business, volunteers, and organizations who are committed to supporting the communities during an emergency or disaster. Services to displaced evacuees may include food, lodging, clothing, transportation, incidentals and information about the crisis. There may also be special services like first aid, child minding, and pet care.

Under the *Emergency Program Act*, each municipal council, First Nation, and regional district that qualifies as a local authority must, as part of the local emergency plan, coordinate the provisions of food, clothing, shelter, transportation and medical services to victims of emergencies and disasters, while EMBC is responsible for providing the provisions of food, clothing, shelter, and transportation to those same evacuees.

To provide these services, the program relies heavily on established suppliers within the community and EMBC ESS Volunteers. Any business or local organization can request to become a supplier for a local authority's ESS program. Goods and services are provided by suppliers in accordance with provincial rates and guidelines and suppliers are reimbursed by the EMBC directly once an invoice is submitted for processing.

The registration of a business or organization as a supplier with a local authority is outside of the scope of this PIA.

During Phase 1 of the modernization of ESS project, EMBC launched an OpenShift online application portal and database, called the Emergency Support Services Registration and Assistance System (ESSRAS), for evacuees to submit ESS registrations and PSLVs to log into the application.

Lessons learned from ESSRAS were used to create a new application called the Emergency Registration Assistance (ERA) application. ERA includes the original online portal for evacuees to register for ESS and now also includes two additional portals for volunteers to log in into the system and a supplier submission page and a Microsoft Dynamics 365 Customer Relationship Management (CRM) application with SharePoint integration for document management. All three portals will be in an OpenShift environment. This will allow for enhanced account and user management, reporting and information gathering, and increased functionality within the tool.

The registrants' personal information will continue to be collected through the online portal, but their personal information will now be loaded into the EMBC's CRM.

The new ERA platform will be installed and run on the BC Government Information Technology Infrastructure (i.e., on prem). The personal and supplier information will only persist within the new CRM and the Information Systems Branch of the Ministry of Attorney General will maintain the CRM application.

System Integration

ERA will also include an electronic system integration with the Corporate Financial System (CFS) to pay out suppliers. The CFS is an integrated system that provides the source of truth to manage the government's financial transactions incorporating the accounting and administration of revenue, expenses, assets, and liabilities. The solution includes applications for financials, self-service, and reporting. The CFS is supported and managed by the Corporate Accounting Services (CAS) branch of the Office of the Comptroller General (OCG).

Suppliers:

As part of the need assessment of evacuees, the ESS Volunteer will create a referral form for each household that will be emailed to them to procure the goods and services from identified suppliers. The ESS Volunteers will be using the email system of the local

authorities to send the referral forms to the registrants and may also send the forms to the suppliers.

Through the supplier portal, suppliers will be able to electronically submit their invoices and receipts for referral reimbursement from the Province.

Suppliers may provide the following business information

- Supplier Legal Name
- Supplier Name
- Store # /Site#/ Location
- GST Number (999999999-RT-9999)
- Supplier Address
- Address
- Contact Person Name and contact information

This information will be provided to the Ministry of Finance (FIN) through the ERA - CFS system integration. The process by which FIN pays out the suppliers is out of scope of this PIA.

Evacuees

Once an evacuee is registered and the ESS Volunteer has completed the ESS eligibility assessment, if the individual is suitable to receive the assistance/funds through e-transfer and agrees to receive the funds in that manner, ERA will connect with CAS through system integration to request the evacuee's CAS supplier number:

ERA will provide the following information to assist CAS in finding a supplier number for the evacuee:

- Name
- Postal Code

If a supplier number is not available, ERA will then provide the following information to CAS for a supplier number to be created and provided back to ERA:

- Name
- Postal Address

Once ERA has a supplier number, it will send the following information to CAS to facilitate the e-transfer:

- Supplier number
- Site Code
- Email
- Mobile Phone Number

- Amount

The payments will go through the CAS supplier/invoice process then through to Provincial Treasury, Central 1 and to Interac. The process by which FIN pays out the suppliers is out of scope of this PIA.

The business process for providing supports to evacuees will not change with respect to the information collected other than in order to be eligible for an eTransfer payment the evacuee must have a valid email address to receive the payment.

Authentication

Although ESS Volunteers are considered employees of EMBC under the *Freedom of Information and Protection of Privacy Act* (FolPPA), they must also register with local authorities. To log into ERA and provide evacuees with their services, ESS Volunteers will use the Business BCeID of their associated local authorities/first nations communities.

The Business BCeID will provide the following information to EMBC:

- Name of Business
- Name of User

To provide additional functions, such as Expense Authority and supports EMBC staff will log-in to MS Dynamics using their IDIR account that has been set up with the appropriate permissions.

Evacuees who are eligible B.C. residents, will be able to use their BC Services Card to authenticate their identity and log into ERA.

The BC Services Card will provide the following personal information of the evacuee to EMBC:

- Primary Documented Given Names
- User Display Name - The individual's name which is their preferred name if available or composed of their documented name
- Birth Date
- Street Address
- Locality
- Province
- Postal Code
- Country
- Address Block

Leveraging the BC Services Card for authentication, the ERA tool will provide a suite of account management options for registrants, allowing them to login to their accounts and providing a record of supports provided.

If the evacuees do not have the BC Services Card, these evacuees will be able to register as a Guest within ERA. They will be required to provide their names, date of birth, their primary residence, and their contact information. If they are registering other members of their household through the system, they would also be required to provide these individuals' name and date of birth. In some circumstances. Evacuees are required to complete all questions within the guest registration process and will be unable to alter submission until they speak with an ESS Volunteer (i.e., Public Safety Lifeline Volunteers).

Local authorities' suppliers will not need to be formally authenticate into the system to log into the ERA's supplier portal. However, in order to be reimbursed, the supplier will be required to provide their legal business name, GST number, address, and contact name and information.

Developers and EMBC Staff will access the Dynamics platform and the information located within the CRM using BC Gov authentication (IDIR account) and the access will be based on roles and responsibilities associated with the IDIR account.

5. What are the potential impacts of this proposal (i.e. Privacy Assessment)?

The personal information will be stored within BC Government infrastructure located in Canada. There is no change to the process by which EMBC ensures the accuracy of personal information used to make decision that affects an individual or to the process by which one may request a correction to their personal information.

A change to the Personal Information directory should be made to the name of the Personal Information Bank (PIB) that will support ESS' case management from the Emergency Support Services Registration and Assistance System (ESSRAS) to the Emergency Registration Assistance (ERA) application.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	As part of the ESS registration through the EMBC ESS public portal, victim of an emergency or an evacuee will be directed to the BC Services Card log in. As part of the authentication process, EMBC will collect specific data elements from the BC Services Card about the individuals. Note that prior to login into the BC Services Card system, the individuals will be required to activate their cards. This is outside of the scope of this PIA.	Disclosure [IDIM] Collection [EMBC]	33(8)(a) 26(c) and (h)(ii) 27(1)(b) [33(8)(a)]

2.	Once authenticated, the individuals will be redirected to ERA to fill in the required information about themselves and the members of their household which will be inputted in CMS.	Collection	26(c) and (e) 27(1)(a)(ii)
3.	If an individual registrant does not have their BC Service Card, they will need to develop security questions and answers to authenticate into the system.	Collection Use Disclosure	26(c) 32(a) 33(2)(d)
4.	Concerned family and friends may inquire about a registrant. During registration, registrant will be asked to consent to their personal information (i.e., ESS registration status) being shared with individuals asking about them. While consent is <i>not</i> required for the purpose of disclosure under the Act, each registrant is asked to consent to their registration status being shared, and, if they do not agree, the status will not be shared.	Collection Use Disclosure	26(c) 27(1)(a)(i) 32(a) 33(2)(d)
5.	The concerned family and friends will have the ability to provide EMBC with their contact information to be shared with the registrant to support reunification.	Collection Use <i>Disclosure</i>	26(c) 32(a) 33(2)(d)
6.	An acknowledgement email will be sent to registrants, who have provided an email address, confirming that EMBC has received their application for ESS.	Use Disclosure	32(a) 33(2)(d)
7.	The ESS Volunteer will conduct a need assessment of the goods and services that the registrant is eligible for and provide the registrant with a referral to receive such services by email using the local authorities email system or in person.	Use Disclosure	32(a) 33(2)(d)
8.	The ESS Volunteer may also send a copy of the referral to the relevant supplier.	Disclosure	33(2)(d)
9.	Suppliers will be able to electronically submit their invoices and receipts for referral reimbursement to EMBC by clicking on the ERA's supplier online portal sign-in button.	No Personal Information involved	Not Applicable
10.	EMBC employees will review the information provided by suppliers and review the registrants' file to approve the reimbursement.	Use	32(a)
11.	This information will be provided to FIN through the CFS system integration and suppliers will be reimbursed by FIN.	No Personal Information involved	Not Applicable

12.	If an evacuee is eligible to receive ESS assistance through e-transfer, ERA will connect with CAS to gather a supplier number for the evacuee. If one does not exist, CAS will create one.	Disclosure Collection Use	33(2)(p) 26(c) 32(a) and (c)
13.	ERA will provide CAS with the evacuee's supplier number and information about the payment to facilitate the evacuees receiving the ESS assistance through e-transferring.	Disclosure	33(2)(d) and (p)
14.	The personal information collected may be used to evaluate the program and provide aggregate information to ministry executives or the Premier's Office.	Use	32(a)
15.	ISB will access the personal information to maintain install, implement, repair, trouble shoot or upgrade the EMBC ESS CRM database.	Disclosure (EMBC) Collection (ISB)	33(2)(t) 26(c) and (e) 27(1)(b)
16.	EMBC will also have the ability to track ERA users' access and activity through the auditing capability of the CRM. The information may be provided to the local government.	Collection Use Disclosure	26(c) and (e) 32(a) 33(2)(d)

6. Security of Personal Information

A. Please describe the technical security measures related to the initiative (if applicable).

Leverages Government services and infrastructure (not applicable).

A Security Threat Risk Assessment was completed on Emergency Management BC's Emergency Support Services Modernization (EMBC ESS) project, and an update to that STRA added a security review of the supplier payment via Interac eTransfer. No new risks were identified during the second review. Controls have been captured in Statement of Acceptable Risk for the ESS project (AGRSA0001009) and for supplier payments through e-transfer (AGRSA0001009).

B. Does your branch rely on security policies other than the Information Security Policy?

The branch relies on the Information Security Policy and does not have any other security policies.

C. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

There are a variety of security roles to support the tool along with application level roles and responsibilities that ensure a separation of duties and limit/restrict unauthorized changes. Additionally, account access is audited on an annual basis, during seasonal readiness, to ensure only approved users have access at the appropriate level.

- Tier 1 - Volunteer - Default role applied for any user created within the Portal.
- Tier 2 - Supervisor - Role assigned by a user with the Director/Manager role or higher. Tier 2 has access to most higher-level functions
- Tier 3 - Director/Manager - Role assigned by a user with LPS role. Tier 3 has access to all of Tier 2 functions plus some additional ones
- Tier 4 - LEP - Created and managed by the EMBC Data Admin when creating the ESS Team or when the LEP user is changed. LEP has access to all Responder Portal functionality. Records with this role cannot be edited in the Responder Portal

There are different roles set up in Dynamics including:

Security Role	User Function
ESS Specialist/Director	For ESS Users that need the following functionality <ul style="list-style-type: none"> • Read access to Registrant, ESS File, Needs Assessment, and Support related data • Create and Update access to ESS Team and ESS Team User data • Read access to ESS Team Area and Supplier List data
EMBC Integration	Created for Integration Service Account Users Integration with <ul style="list-style-type: none"> • Supplier Portal • Registrant Portal • Responder Portal • CAS Integration web service calls.
EMBC Finance QR	For EMBC Finance Users that review and approve Supplier Invoices
EMBC Finance EA	For EMBC Finance Users that review and approve Supplier Payments
ECC Duty Manager	For ECC users that create and update EMBC Tasks

7. Common or Integrated Program and Data-Linking Initiatives

		Yes	No
(a)	Does the original PIA (or the change now being considered) involve a “common or integrated program/activity”, as defined in Schedule 1 of the <i>Freedom of Information and Protection of Privacy Act</i> (FOIPP Act)? * *Note: a “common or integrated program/activity” must be confirmed by regulation		X
(b)	Does the original PIA (or the change now being considered) involve a “data-linking initiative”, as defined in Schedule 1 of the FOIPP Act?		X

Ministry Comments:

Privacy, Compliance and Training Branch Review and Comments:

PCT has reviewed the ministry's PIA update. PCT and the OIPC have reviewed this PIA update and have no concerns from a privacy perspective.

Katie Nieminen

Privacy Analyst
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Citizen's Services



Signature

May 10, 2022

Date

X SIGNATURES**PUBLIC BODY APPROVAL:**

Karine Bordua

Ministry Privacy Officer
Information Systems Branch
Ministry of Attorney General



Signature

2022-05-16

Date

Kimberly Yanick

Director, Information Security and
Compliance
Information Systems Branch
Ministry of Attorney General



Signature

2022-05-12

Date

Melissa Sexsmith

Executive Director, Strategic
Planning & Digital Transformation
Information Systems Branch
Ministry of Attorney General



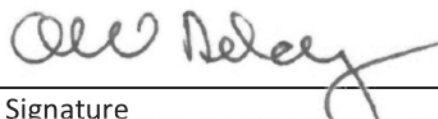
Signature

2022-05-12

Date

Alex Delaney

Director IT & Operational
Emergency Management Systems
Emergency Management BC
Ministry of Public Safety and
Solicitor General



Signature

2022-05-12

Date

Pader Brach

Pader Brach

Executive Director, Operations
Emergency Management BC
Ministry of Public Safety and
Solicitor General



Signature

2022-08-03

Date

Appendix A: Consent
(Not a consent for the purposes of FOIPPA)

Consent to share registration status

Concerned family and friends may inquire about you and your household as a result of this emergency event. Do you consent to have your registration status shared with those who may ask about your wellbeing?

☐ Yes - you may share the status of my ESS registration

I consent to an ESS Volunteer only sharing my registration status with concerned family and friends for reunification purposes. Concerned family and friends may choose to leave their contact details (telephone number and/or email address) where they can be reached. These contact details can be added under the Notes section of the active ESS file, by a trained ESS Volunteer.