

## Kukucska, Cindy L FIN:EX

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**From:** Onciul-Omelus, Jamie FIN:EX  
**Sent:** Monday, September 12, 2016 9:59 AM  
**To:** Kukucska, Cindy L FIN:EX  
**Cc:** Beach, Kara FIN:EX  
**Subject:** FW: oi  
**Attachments:** OI Steps to Publish Copyright Packages.docx; oi.docx

Hi Cindy,

Instructions are complete.

Please see the TEST environment for the updated Publication Status drop down box. Advise if any changes are required. I will await your instruction on adding this to PROD.

Thanks!

**Jamie Onciul-Omelus, CIAPP-P**

Business Service Manager, Business Intelligence and Application Services

Information Access Operations, Ministry of Finance

**Ph:** 250 356-8343

**e:** [jamie.onciul-omelus@gov.bc.ca](mailto:jamie.onciul-omelus@gov.bc.ca)

**m:** PO Box 9569, Stn Prov Gov, Victoria BC V8W 9K1

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**From:** Onciul-Omelus, Jamie FIN:EX  
**Sent:** Monday, September 12, 2016 9:47 AM  
**To:** Onciul-Omelus, Jamie FIN:EX  
**Subject:** FW: oi

I chatted with Cindy K on Sep 8, 2016 and now what to add to AXIS.

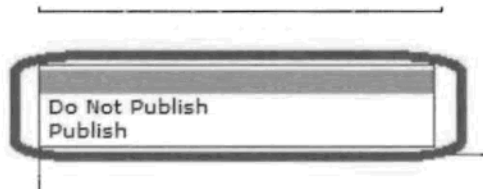
In the Additional Fields tab, add 'Publish minus copyright' to this drop down:

Open Information

Publication Status :

Do Not Publish Reason :

Analyst Comments :



A screenshot of a dropdown menu. The menu is open, showing two options: "Do Not Publish" and "Publish". The "Do Not Publish" option is currently selected and highlighted. The menu is enclosed in a rounded rectangular border.

Add to TEST first confirm with OI they like it. Then add to PROD once the process is approved.

**Jamie Onciul-Omelus, CIAPP-P**

Business Service Manager, Business Intelligence and Application Services

Information Access Operations, Ministry of Finance

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**m:** PO Box 9569, Stn Prov Gov, Victoria BC V8W 9K1

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**From:** Onciul-Omelus, Jamie FIN:EX  
**Sent:** Monday, August 29, 2016 7:51 AM

**To:** Beach, Kara FIN:EX; Kukucska, Cindy L FIN:EX  
**Subject:** FW: oi

Hi,

See the attached OI Steps to Publish Copyright Packages. This is what I have tested and is the same process that Kara and I worked on and it works just great in the TEST environment. It worked just fine on the live file Kara tried this out on too.

I think we should sit down so I can understand what you want on this screen though:

Open Information

Publication Status :

Do Not Publish Reason :

Analyst Comments :

Page Reference :

OI Comments :

**Jamie Onciul-Omelus, CIAPP-P**

Business Service Manager, Business Intelligence and Application Services  
Information Access Operations, Ministry of Finance

**Ph:** 250 356-8343

**e:** [jamie.onciul-omelus@gov.bc.ca](mailto:jamie.onciul-omelus@gov.bc.ca)

**m:** PO Box 9569, Stn Prov Gov, Victoria BC V8W 9K1

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**From:** Kukucska, Cindy L FIN:EX

**Sent:** Monday, August 15, 2016 9:16 AM

**To:** Onciul-Omelus, Jamie FIN:EX

**Cc:** Beach, Kara FIN:EX

**Subject:** oi

Hi Jamie.

This is my preliminary/draft idea...

I'd appreciate if you could help us flush out what you think might be the 'best' way to have a secondary package should we decide to go down that road.

- Create a second review layer?
- Take response records and upload to a different file type?
- Other?

Thank you.

# OI Steps to Publish Copyright Packages

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1. OI Analyst examines records eligible for publication and finds copyright.
2. Delete workflow from Tracker.
3. Unpublish or delete from Reading Room.
4. Amend request. Reason: federal copyright found.
5. Remove package from Request folder to the Review Log.
6. Sever all instances of copyright and save review layer as a new review layer and name it OI – Federal Copyright.
7. Move to Request Folder.
8. Final actions (ensure you back date to same disposition added date).
9. Close request (ensure you back date to same close date).
10. Send to Reading Room.

## Possible revised process:

### FOI Analyst:

- Reviews file for all exemptions **excluding copyright** (*change*)
- Submits file for sign-off and publication
- Sends response to applicant, as always
- Sends to OI for exemption or publication, as usual
- Updates AXIS

### OI QA Analyst:

- Approves exemptions found
- Reviews files where no exemptions were found
- Publishes files with no additional exemptions found and without copyrighted material
- Redacts possible copyright material **and** saves publication version of response (*new*)
- Publishes publication version and amends AXIS to note publishing minus copyright (*new*)

## Pros/Cons:

- ✓ FOI Analysts no longer worry about looking for Copyright ©
- ✓ FOI Analysts focus on finding the more important exemptions, such as personal information
- ✓ Significantly more files get posted to Open Information
  - Sign-off form may need a slight adjustment to advise client ministries that the file will be published but *minus any copyright material found*
  - A second 'publication' response package must be created (and saved) by the QA Analyst (process TBD)
  - Increased volume of files for the QA Analyst to review (twice) for publication *and* copyright
  - To track, IAO would want to add another field to AXIS to note Publish minus copyright (or similar)
  - No change required to applicant correspondence but recommend adding explanatory language to OI site noting that material protected by Federal copyright has been removed prior to publication

## Scenarios:

	Exemption found by FOI Analyst During regular processing	No exemption found by Analyst (or OI); No copyright found by OI	( <i>NEW</i> ) No exemption found by FOI Analyst (or OI); Copyright found by OI
AXIS	Do Not Publish + reason added; OI comment to note approval	Publish	Publish
Sign-off sheet	Do Not Publish + reason noted	Publish	Publish
Letter to Applicant	Your request will not be posted	Your request will be posted	Your request will be posted
Additional or New Steps	None	None	1/New package created; 2/AXIS amended to Publish minus Copyright (or similar)
Open Info site	Not Posted	Posted	Posted <i>minus copyright</i>

#### Exemption Criteria from MD 06-2016:

Records released as responsive to an FOI Request may be exempted from disclosure on the Open Information website, either in whole or in part, if they contain any of the following:

- a) Personal information, if the disclosure would constitute an unreasonable invasion of an individual's privacy;
- b) Information that may harm relations with a First Nation;
- c) Information that may harm relations with another government;
- d) Information that may harm a third party's business interests;
- e) Information that may threaten the safety of a person or harm the security of any property or system; or
- f) Information which should not be disclosed on the Open Information website for other legal or compelling public interest reasons

#### Exemption Criteria from OI Policy:

#### Appendix A – Proactive Disclosure Exemption Criteria

Responses to General FOI Requests will be considered for exemption from Proactive Disclosure and posting on the Open Information Website if they contain:

- Personal Information or information that could lead to the identification of the Applicant or other persons;
- information that may harm relations with a First Nation;
- information that may harm relations with another government;
- information that may harm a third party's business interests; or,
- information that is not suitable for Proactive Disclosure based on a formal risk assessment that disclosure to the public may threaten the safety of a person or harm the security of any property or system.

**From:** [Kukucska, Cindy L FIN:EX](#)  
**To:** [Beach, Kara FIN:EX](#)  
**Subject:** for comment  
**Date:** Tuesday, September 27, 2016 3:23:38 PM  
**Attachments:** [draft.msg](#)

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**Sent:** Tuesday, September 27, 2016 3:23 PM  
**Subject:** draft

Hello IAO,

On behalf of the Open Information team I am pleased to let you know of a change in practice relating to how IAO handles records potentially protected by federal copyright legislation.

**Effective October 1, 2016**

**FOI Analysts will no longer need to identify copyright within responsive records**

**Records (or portions of records) unable to be published due to federal copyright legislation will be redacted prior to publication by the Open Information team**

**FOI Analysts will continue to:**

- Review records for publication exemptions, excluding copyright
- Update AXIS to reflect Publish or Do Not Publish
- Submit exemption requests to Open Information for approval (prior to sign-off)
- Submit response packages to Open Information for publication, once approved

**Open Information will:**

- Review exemptions to publication, as requested by analysts
- Review response packages forwarded for suitability to post
- Where material protected by federal copyright is located, the OI analyst will amend the file to create a second review layer in AXIS named *Open Information – For Publication*
- The *Open Information – For Publication* package will be posted to the Open Information
- The OI analyst will update the AXIS Additional Info tab to *Publish minus copyright*

**Clarification / Additional Details:**

- Requests closed before October are not impacted as the change is effective October 1, 2016
- Requests exempted for copyright but not in sign-off by October 1<sup>st</sup> will have to be reassessed
- Requests in sign-off on October 1<sup>st</sup> will be handled on an individual basis between Open Info and the analyst/team responsible
- Sign-off forms will have updated wording as of October 3<sup>rd</sup>

**Resources:**

- Analyst Publication Guidelines [[link](#)]
- How to Exempt a file from Publication [[link](#)]
- How to Send a file for Publication [[link](#)]
- Excerpt of updated sign-off form [[link](#)]
- Open Information Policy [[link](#)]
- Ministerial Directive 06-2016 [[link](#)]
- [FOI Releases](#) – Open Information [website](#)

**Contacts:**

For further information or additional support, please connect with any member of the Open Information team:

Cindy Kukucska	250 387-7356
Kara Beach	250 952-0361
Shari Colliness	250 387-6097



From: [Kukucska, Cindy L FIN:EX](#)  
To: [Beach, Kara FIN:EX](#)  
Subject: FW: Change to Generals sign-off form please  
Date: Tuesday, September 27, 2016 3:53:24 PM  
Importance: High

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Make sense?

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From: Kukucska, Cindy L FIN:EX  
Sent: Tuesday, September 27, 2016 3:53 PM  
To: Onciul-Omelus, Jamie FIN:EX  
Cc: Beach, Kara FIN:EX  
Subject: Change to Generals sign-off form please  
Importance: High

Hi Jamie.

For Monday morning, could the AXIS Additional Info tab be updated to add **Publish minus copyright** as an option please?

Could we also have the following two changes made to the IAO sign-off form in place for Monday morning as well?

( I highlighted them just so you knew for sure what they are)

Talk soon.

**Publication Recommendations:**

- Note that all **general FOI request records** that are released to an applicant should be published on the Open Information website unless the exemption criteria apply. The exemption criteria can be found on page 3 of [Ministerial Directive 06-2016](#) and on page 11 of the [Open Information and Open Data Policy](#)

Choose from one of the following

- IAO recommends publishing this general FOI request on the Open Information website.  
**\*Effective October 1, 2016** records (or portions of records) unable to be published due to federal copyright legislation will be redacted prior to publication by the Open Information team.
- IAO recommends NOT publishing this general FOI request on the Open Information website in accordance with the Open Information and Open Data Policy. The records meet the publication exemption criteria; Exemption Reason. This information would be harmful if disclosed to anyone other than the applicant.
- IAO recommends NOT publishing this general FOI request on the Open Information website. The records meet the publication exemption criteria as they contain information that is not suitable for proactive disclosure based on a formal risk assessment that disclosure to the public may threaten the safety of a person or harm the security of any property or system.
- ~~○ Due to federal copyright issues, this general FOI request will NOT be published on the Open Information website.~~
- As this will be Response Type response this general FOI request will NOT be published on the Open Information website.
- As this is a personal FOI request, it will NOT be published on the Open Information website.

**From:** [Colliness, Shari D FIN:EX](#)  
**To:** [Kukucska, Cindy L FIN:EX](#)  
**Subject:** RE: Social Media sites  
**Date:** Thursday, September 29, 2016 3:50:00 PM  
**Attachments:** [image001.png](#)

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Dissecting will be a good thing in this regard 😊! Looking forward to it!

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**From:** Kukucska, Cindy L FIN:EX  
**Sent:** Thursday, September 29, 2016 3:45 PM  
**To:** Beach, Kara FIN:EX; Colliness, Shari D FIN:EX  
**Cc:** Morita, Kelly FIN:EX; Frelick, Neil FIN:EX  
**Subject:** FW: Social Media sites  
FYI from Lori on social media sites.

We can add it to our next week's team meeting (Kara and Shari) for further dissecting 😊

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**From:** Kernaghan, Lori MTIC:EX  
**Sent:** Wednesday, September 28, 2016 3:53 PM  
**To:** Kukucska, Cindy L FIN:EX  
**Subject:** Social Media sites  
Hi Cindy,

It was great to meet with your group today for our conversation regarding copyright. I did a quick read through the [BC government social media guidelines](#). Surprising to see that it has been six years since I was involved with the development of those guidelines! Interestingly, the records management piece of the guidelines talks about creating a government record when social media interactions are not transitory (when they contribute to a decision or policy or are needed to document advice, transactions or operations). It is here where capturing a copy (e.g. screen shot) of the posting is recommended to create the government record. Not sure if the specific record of the tweet I was shown as an example this morning would be considered transitory or not, but I did review the terms of use for both Facebook and Twitter and note that they are silent when it comes to any reproducing and further distributing content of content outside of those social media sites, which leads me to believe that the social media sites are expecting users to abide by the Copyright Act of their respective country. Taking a copy for record keeping purposes would be considered allowable under the Copyright Act. If the tweet is a public facing tweet (I understand that one can also send personal tweets that can only be viewed by the recipient of that tweet), then the level of risk associated with including a screen shot of a third party tweet within a release package published on the Open Information website is probably more on the low end of the risk spectrum. The level of risk may increase if the tweet captured by the screen shot has been removed and is no longer available on the Twitter site. Food for thought.

Regards,

**Lori Kernaghan** | Intellectual Property Manager | Intellectual Property Program | Ministry of Technology, Innovation and Citizens' Services  
**p:** 250 216-6906 | **e:** [Lori.Kernaghan@gov.bc.ca](mailto:Lori.Kernaghan@gov.bc.ca) | **m:** PO Box 9452, STN PROV GOVT, Victoria BC V8W 9V7



Where ideas work

2016  
TOP  
WORK UNIT  
AWARD

## Kukucska, Cindy L FIN:EX

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**From:** Kukucska, Cindy L FIN:EX  
**Sent:** Thursday, September 29, 2016 11:51 AM  
**To:** FIN IAO FOI  
**Subject:** New Process regarding Copyright

**Importance:** High

Hello IAO,

On behalf of the Open Information team I am pleased to let you know of a change in practice relating to how IAO handles records potentially protected by federal copyright legislation.

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**Cindy Kukucska** | Manager, Intake / Open Information / Business Intelligence & Application Services | Information Access Operations

**ph:** 250 387-7356 **m:** 250 589-5073 | **e:** [Cindy.Kukucska@gov.bc.ca](mailto:Cindy.Kukucska@gov.bc.ca) | **m:** PO Box 9569 Stn Prov Gov Victoria BC V8W 9K1



INFORMATION  
ACCESS OPERATIONS  
MINISTRY OF FINANCE

## Kukucska, Cindy L FIN:EX

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**From:** Kukucska, Cindy L FIN:EX  
**Sent:** Thursday, September 29, 2016 12:27 PM  
**To:** Ghag, Kris FIN:EX; Fuller, Russ D FIN:EX; Vanzetta, Maxine FIN:EX; Elbahir, Cindy FIN:EX; Bejcek, Ken FIN:EX  
**Cc:** Hoskins, Chad FIN:EX; Nisbet, Justine FIN:EX  
**Subject:** FW: New Process regarding Copyright

Hi Managers.

A couple of follow-up notes:

- Please feel free to forward this note, or any portion of it, to your client ministries, if/as appropriate;
- If you get any questions or comments, please pass them along to me. I'm also happy to chat directly with anyone who might have questions or comments;
- CE: We might want to chat a bit about how this change will affect the 'copyright' series of files currently in progress;
- Files that are 'open' as of October 1<sup>st</sup> that were previously approved for exemption are no longer exempt. Please ensure your analysts are aware of this. In addition, the OI analyst will be removing the exemption approval and sending the assigned analyst an email advising the file needs to be reassessed.
- Files that were already in 'sign-off' before October 1<sup>st</sup> will be identified by the OI team. We'll be in touch to get your thoughts on best approach for each file.

We can discuss further at our next MM, but please come on down if you want to talk sooner.

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**From:** Kukucska, Cindy L FIN:EX  
**Sent:** Thursday, September 29, 2016 11:51 AM  
**To:** FIN IAO FOI  
**Subject:** New Process regarding Copyright  
**Importance:** High

Hello IAO,

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INFORMATION  
ACCESS OPERATIONS  
MINISTRY OF FINANCE

## Kukucska, Cindy L FIN:EX

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**From:** Kukucska, Cindy L FIN:EX  
**Sent:** Thursday, September 29, 2016 3:28 PM  
**To:** Beach, Kara FIN:EX; Colliness, Shari D FIN:EX; Frelick, Neil FIN:EX; Morita, Kelly FIN:EX  
**Subject:** IPP's copyright presentation  
**Attachments:** Copyright 101 - Open Information (2016-09-28).pptx

See below and attached from Lori/IPP

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**From:** Kernaghan, Lori MTIC:EX  
**Sent:** Thursday, September 29, 2016 2:57 PM  
**To:** Kukucska, Cindy L FIN:EX  
**Subject:** RE:

Hi Cindy,

Happy to share the presentation with you! Also, Industry Canada (one of the two federal departments that have responsibility over the *Copyright Act*), has a good copyright overview on the following website:

<http://www.ic.gc.ca/eic/site/icgc.nsf/eng/07415.html>

# Copyright 101

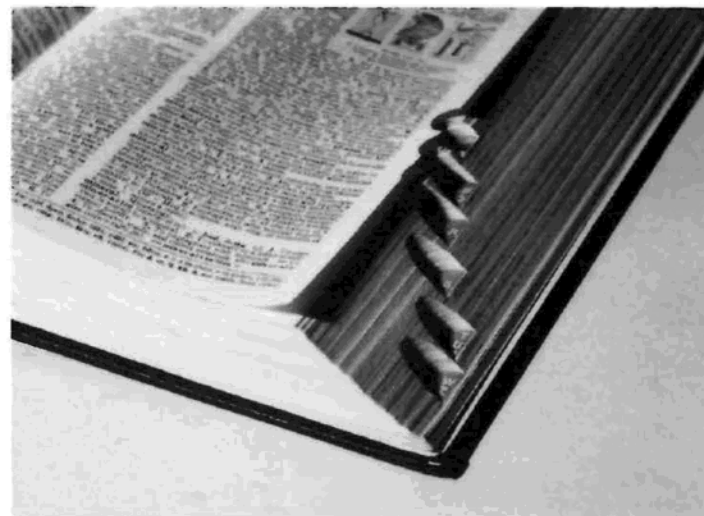
Briefing for Open Information Team  
Ministry of Finance  
September 28, 2016

Lori Kernaghan  
Intellectual Property Manager  
Technology, Innovation and Citizens' Services



# Intellectual Property

*“Legal rights that result from intellectual activity in the industrial, scientific, literary and artistic fields.”*





# INTELLECTUAL PROPERTY

Copyright

Trade-mark

Patent

Industrial Design

Trade Secret

# Categories of Copyright

**Literary** – anything in written format

Dramatic

**Artistic** – maps, drawings, images

Musical

Sound recording

Performer's performance

Communication signals



# What are Moral Rights?



CC BY-SA 2.0 Simon Law

- These are personal, individual rights
- Cannot be sold or transferred
- Can only be waived by the author/creator

# Moral Rights

## 1. Right of ATTRIBUTION

- To be associated with a work as its author:
  - by name;
  - under a pseudonym; or
  - remain anonymous



# Moral Rights

## 2. Right to the INTEGRITY of the work

- The work cannot be distorted, mutilated or otherwise modified if it will prejudice the author's honour or reputation



CC BY-SA 3.0 NY

# Moral Rights

## 3. Right of ASSOCIATION

- Control the use of the work in association with a product, service, cause or institution





Ministry of  
Technology, Innovation  
and Citizens' Services

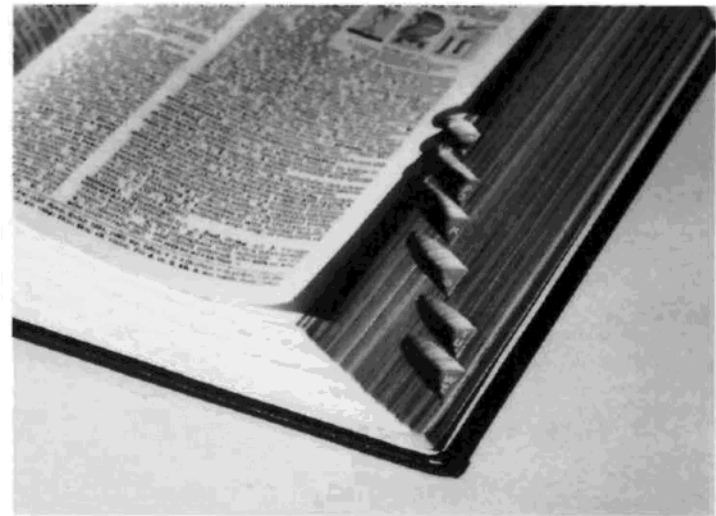


CC BY-SA 2.0 Simon Law



# Infringement

*“The action of  
breaking the terms of  
a law, agreement,  
right or obligation.”*



# Types of Infringement?

## Copyright Infringement

- Reproduction or publication of a work, or any substantial part of a work, without permission of the copyright owner

## Moral Rights Infringement

- Use of an author's materials in a way that affects the author's integrity or their right to attribution and association



# What is NOT Infringement?

Fair Dealing

Public Domain

License





## For Fair Dealings to apply, the use must be “Fair”:

<i>Nature of the Dealing</i>	<b><i>Less fair</i></b>	<b><i>More fair</i></b>
<b><i>Purpose</i></b>	Commercial	Charitable/Educational
<b><i>Character of the dealing</i></b>	Multiple copies; Widely distributed/repetitive	Single copy; Limited distribution/one-off
<b><i>Importance/amount of work copied</i></b>	Entire Work/Significant excerpt	Limited/trivial amount
<b><i>Effect of dealing on the original work</i></b>	Competing with original work	No detriment to original
<b><i>Nature of the work</i></b>	Confidential	Unpublished/in public Interest
<b><i>Available alternatives</i></b>	Non-copyright works available; Not necessary for purpose	No alternative works; Necessary to achieve purpose



Fair Dealing by Giulia Forsythe (CC BY-NC-SA 2.0)

# Public Domain

**A work is considered to be in the public domain if:**

- **Copyright term has expired**
- **Owner has legally forfeited their rights**
- **Not original enough to attract copyright in the first place**



## Have questions when reviewing a package for publishing on the Open Information website?



**Lori Kernaghan – IP Manager**

**[Lori.Kernaghan@gov.bc.ca](mailto:Lori.Kernaghan@gov.bc.ca)**

**Phone: 250 216-6906**



