

Patriarche, Kerry FIN:EX

From: Brouwer, Deborah FIN:EX
Sent: February 4, 2019 2:14 PM
To: Goss, Jordan T FIN:EX
Cc: Emery, Steven B FIN:EX; Demianchuk, Janette FIN:EX
Subject: RE: PIA's used by Service BC
Attachments: FIN 16034 Tier One Calls for PTB.pdf; FIN18070 - Call Centre PIA Update Spec Tax v.3.doc; FIN18049 - PIA_PTB Tier 1 FINAL_5SEPT2018.pdf

Hi Jordan – Janette was able to find these. Please let us know if we need an update to 16034.

FIN 16034 – Tier One PIA for ESIT – Sept 2016
FIN 18049 – Tier One PIA for Maximus – Sept 2018
FIN 18070 – Tier One PIA for Maximum SVT – current

From: Goss, Jordan T FIN:EX
Sent: February 4, 2019 1:46 PM
To: Brouwer, Deborah FIN:EX
Cc: Emery, Steven B FIN:EX
Subject: FW: PIA's used by Service BC
Importance: High

Deb

I am hoping that you are able to provide me a copy of the PIAs that we have in place for SVT as well as the PIA referenced below – 16034 so that I can look and see what more we may need to add to cover off ESIT-AS to support us in taking SVT calls. Thanks.

Jordan Goss
250 387-0665

From: Bell, Russell CITZ:EX
Sent: Monday, February 4, 2019 1:27 PM
To: Goss, Jordan T FIN:EX <Jordan.Goss@gov.bc.ca>
Cc: Eason, Jeannette CITZ:EX <Jeannette.Eason@gov.bc.ca>; Mousseau, Jeff CITZ:EX <Jeff.Mousseau@gov.bc.ca>
Subject: PIA's used by Service BC

Jordan,
SBC uses PIA MTIC 16066 and CITZ 18043 to support this process.
CITZ 18043 describes - Ownership of tier One Call centre for Property Tax is with Maximus

MTIC 16066 – describes - SBC Contact Centre agents would provide citizens Tier 1 support for the PayBC's applications.
"The SBC Contact centre already collected person information as necessary to assist callers with queries and it is not necessary to collect further detailed information about the citizen's PAYBC usage needs."

Both PIA's for SBC are light on detail as they reference FIN #16034 as the overriding authority for action.

Please use this PIA as the basis for further action.

Cheers

RB

Russell Bell

A/Director, Contact Centres

Service BC

Ministry of Citizens' Services

T: 250 952 6854 | M: 250-507-9572 | Web: <http://www.servicebc.gov.bc.ca>

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Privacy Impact Assessment for Property Taxation Branch – Operation HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

Part 1 – General

Name of Ministry:	Ministry of Finance		
PIA Drafter:	Roger Tailleux, Policy and Legislative Analyst, Property Taxation Branch		
Email:	Roger.Tailleux@gov.bc.ca	Phone:	(250) 356-8853
Program Manager:	Louise Ford, Manager, Systems, Operations, Planning and Support, Property Taxation Branch		
Email:	Louise.Ford@gov.bc.ca	Phone:	205 387-5469

1. Description of the Initiative

The primary function of the Property Taxation Branch (PTB) of the Ministry of Finance (FIN) is the administration of the following four programs, each of which are enabled by program-specific legislation:

Program	Function	Enabling Legislation
Rural Property Taxes	Levied and collected by PTB in areas of the province outside of municipalities, regional districts and other minor taxing jurisdictions	<i>Taxation Rural Area Act</i> (TRAA)
Home Owner Grant	Available to homeowners that pay property taxes to a municipality, or to the province if they live in a rural area	<i>Home Owner Grant Act</i> (HOGA)
Property Tax Deferment	Low interest loan available to qualifying homeowners allowing deferment of a portion or all of their residential and farm class property taxes	<i>Land Tax Deferment Act</i> (LTDA)
Property Transfer Tax	Registration tax payable upon the purchase or gain of an interest in property that is registered at the Land Title Office	<i>Property Transfer Tax Act</i> (PTTA)

Each of the four program areas receives a very high volume of contact from PTB's clients (rural taxpayers, municipalities, lawyers and accountants, etc). Contact is made by the following interaction channel types: telephone calls; emails; mail; fax and, Service BC and Government Agent offices.

Contact volumes vary throughout the year, ranging from clearly-defined peak periods (by program or work area) in which very high volumes are received, to periods in which contact volume is lower.



Privacy Impact Assessment for

Property Taxation Branch – Operation

HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

The year-round management of communication with clients by PTB staff represents a very significant workload that requires efficient and accurate responses to questions or requests for information that are sometimes simple to answer. Conversely, some questions are complex and therefore require significant expertise and time to respond to appropriately.

As part of its initiative to improve customer service, PTB has contracted HP Advanced Solutions (HPAS), FIN's service provider, to act as a call centre for a six month pilot project. During this initiative calls received on PTB's phone system will be sorted (based on the caller's selection in the phone tree) into two streams: Property Transfer Tax (PTT), and all other calls. PTT calls will stay within PTB for response, while all other calls will be automatically re-routed to the HPAS call centre. HPAS will manage all non-PTT calls by:

- responding directly to Tier 1 calls (i.e. information that is publicly available, and basic information on account status)
- adding memos to accounts describing the action taken on the client's file (i.e. contact information updates, forms sent out, replacement notices with updated address sent).
- forwarding all Tier 2 calls (i.e. questions that require a judgment or decision) to PTB
- providing callers (if requested) with information by email. This will include personal information such as account balances, if requested by client. This will be sent via a government generic email box with a no reply message on the bottom. HPAS will be using BC Government IDIR accounts and will therefore not be storing the emails. Emails will be stored on BC Government systems.

The main purpose of this new initiative is to significantly improve customer service by reducing overall phone call wait times. The key expectation is that by diverting the information-seeking calls to HPAS, PTB staff will be better able to promptly respond to complex and/or more time-consuming questions and information requests.

In addition, PTB staff will therefore be better able to focus on the multiple administrative and processing functions of the branch more promptly and efficiently. This is expected to result in not only fewer phone calls in future, but hopefully fewer contacts on other client interaction channel types. By promptly providing consistent, accurate and complete information to clients during phone interactions, it is expected there will be fewer 'secondary calls'.



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PIA# FIN16034

HPAS is an agent that acts on behalf of the Province, providing numerous revenue management services, including assisting in the administration of the acts cited in the above table. As part of the administration of the four programs listed above, HPAS currently performs various tasks which require their staff to view, process, and store the personal information of clients on behalf of PTB and other branches of FIN.

In addition to the services currently being provided to PTB by HPAS, the Tier 1 Call Centre Pilot Project will include data entry that is limited to HPAS staff updating contact information and making memo entries documenting the specific service provided to the client. HPAS staff will use the following FIN systems: Rural Property Tax Information System (RP2K), Revenue Management System (RMS-CRM), Tax Deferment Application (TDA), and Content Manager.

PTB uses the Computer Talk Technology Inc. (ComputerTalk) Ice Control Centre to channel calls, provide voice messaging and scripting, and recording of voice messages for client calls. HPAS will track the status of PTB phone lines in real time using the Avaya phone system, which will display the number of calls under way, the number of calls on hold in the queue, and the staff that are available to respond to those calls. The six month call centre initiative is expected to begin on May 16, 2016, at HPAS's Victoria call centre.

2. Scope of this PIA

This PIA is specific to the HPAS Tier 1 Call Centre Pilot Project. It covers the limited access, by HPAS, required to collect, use and disclose clients' personal information stored in the following FIN data systems: RP2K, RMS-CRM, TDA, and Content Manager.

As part of the service provided, HPAS agents will: view account data in order to verify a client's identity; provide answers to basic questions once identity of caller has been verified; inform the client where to find information online; and, if requested by the client, email or mail documents to the address provided by the client. Phone calls with questions that are more account specific or that require the use and disclosure of personal information that is beyond the scope of Tier 1 questions will be transferred to PTB staff.

This PIA is in place for HPAS staff working on the Tier 1 Call Centre Pilot Project for the six month duration of the initiative.



Privacy Impact Assessment for Property Taxation Branch – Operation HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

3. Related Privacy Impact Assessments

Systems Previously Assessed by PIAs

<u>Software Name</u>	<u>PIA</u>
Rural Property Tax Information System (RP2K)	PIBS_FIN_293; (no PIA FIN# found)
Revenue Management System (RMS-CRM)	RMS Overarching PIA FIN15033
Tax Deferment Application (TDA)	Land TDA PIA FIN16016, and PIBS FIN_295
Content Manager	RMS Content Manager SBR06002
PTB ICE Control Centre	ICEAnywhere Phone System FIN15032
HPAS Call Centre as a Service	FIN16045 (currently under review)

4. Elements of Information or Data

HPAS staff will view, use and disclose those elements of information/data that are required to provide service to clients within the following programs: rural property taxes, home owner grants, (mainly rural taxpayers that have accounts with the Ministry), and property tax deferment.

The data that will be viewed by HPAS includes the following:

Name
Age (in some cases)¹
Address
Work/home email address
Work/home phone number,
Financial institution (in some cases)
Financial information relating to their accounts.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

The information will be stored in BC Government and HPAS data centres in Canada, and will only be accessible within Canada.

¹ There are age requirements for some of our programs, such as: an additional home owner grant for seniors; tax deferment available for 55+ years of age.



Privacy Impact Assessment for Property Taxation Branch – Operation HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

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. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.

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;	no
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.	no

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. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

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;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no



Privacy Impact Assessment for Property Taxation Branch – Operation HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	PTB phone system redirects calls to HPAS call centre.		
2.	Callers hear the following greeting: <i>"You have reached Revenue Services of British Columbia. This call could be monitored for quality and training purposes, please have your account number ready so we may assist you more efficiently."</i>	Out-of-scope (another PIA will cover this step)	
3.	Callers select an option on the phone tree: PTT related calls are routed to PTB, and all other calls go to HPAS.	Out-of-scope (PIA# FIN16045 will cover this step)	
4.	HPAS agents respond to caller's questions/requests for information and make an initial determination on whether a call is Tier 1 or Tier 2. No personal information is involved at this point.		
5.	HPAS agents respond to Tier 1 calls (i.e., direct callers to information on website, provide general public information). No personal information is involved at this point.		
6.	As part of Tier 1 call management HPAS agents also update contact information, and respond to basic questions on account details (if requested). HPAS enters memos in client files that record the issues discussed and the action/follow up required.	Collection;Use;Disclosure	26(c) 32(a) 33.1(1)(i.1) 33.2(a)
7.	As part of Tier 1 call management HPAS agents will send requested information (i.e.,	Use;Disclosure	32(a) 33.1(1)(i.1)



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PIA# FIN16034

	forms, account balances) to clients by email.		33.2(a)
8.	If, at any point in the course of responding to Tier 1 calls, HPAS agents determine that the call is actually (or has become) a Tier 2 call, they will forward the call to PTB staff for response. HPAS agents transfer calls to PTB without disclosing personal information.		

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	HPAS employees collect or view personal information and use or disclose the information for personal purposes.	Contractual Agreement and/or Workplace Ethics procedures	Low	High
2.	HPAS emails are sent to wrong recipient (s).	HPAS employees are instructed to read back the email address to the client before sending, to ensure it is going to the correct recipient(s).	Low	High
3.	Individual calling for information on an account may not be the actual holder of that account.	HPAS uses a defined process to verify caller's identity.	Low	Medium

10. Collection Notice

PIA# FIN16045 covers the initial collection notice when clients connect with the call centre.



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HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

Part 3 – Security of Personal Information

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

- The HPAS Call Center has strong physical controls in place, such as cameras; all access points require a user badge, and all visitors and vendors are escorted .
- User access profiles have been assigned on a need-to-know basis.
- Controls, procedures, and training are in place to protect the integrity of personal information.
- An ongoing audit process tracks the use of: RP2K, RMS, -CRM, TDA, and Content Manager.

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

All information is stored in secure data centers in geographically separate locations within Canada. (Victoria, Kamloops, Calgary). HPAS agents will use BC Government IDIR email accounts.

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

PTB policies and procedures manuals regarding the use, collection and disclosure of private information are kept by supervisors in PTB. HPAS has its own policies modeled after the Province's.

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.

User access is role-based. Roles and related permissions are reviewed by HPAS to confirm they are correct and that errors are detected and corrected promptly. The authorization model and consistent use of these processes are reviewed regularly. Logging and monitoring of access and any unusual or irregular access is investigated.

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

The HPAS Call Center has an extensive audit trail to ensure all access is adequately tracked.

All databases have audit logging and access restrictions.

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



Privacy Impact Assessment for

Property Taxation Branch – Operation

HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

personal information will be disclosed to others, how will the ministry notify them of the update, correction or annotation?

The phone process itself is meant to promote accuracy and correctness by obtaining the information directly from the individual involved.

HPAS agents will make annotations to client files regarding contact information updates only. Personal information will not be disclosed beyond the owner of the information.

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

No, HPAS agents respond to Tier1 calls only. No judgments or decisions on client accounts are made at the Tier 1 level.

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.

N/A

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?

N/A

Part 5 – Further Information

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

No.

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?

No.



Privacy Impact Assessment for Property Taxation Branch – Operation HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

Part 6 – PCTB Comments and Signatures

Alan Arslan

September 09, 2016

Privacy Advisor
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Finance

Signature

Date

Holly Romanow

September 12, 2016

A/Senior Privacy Advisor
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Finance

Signature

Date



Privacy Impact Assessment for Property Taxation Branch – Operation HPAS Tier 1 Call Centre for PTB

PIA# FIN16034

Part 7 – Program Area Comments and Signatures

Louise Ford

Louise Ford
Manager System Operations and
Planning
Property Taxation Branch
Ministry of Finance

Louise Ford
Signature

SEPT. 23/16
Date

Richard Barlow

Richard Barlow
Ministry Privacy and Information
Security Officer
Ministry of Finance

Richard Barlow
Signature

Sept 29/16
Date

Elan Symes
Assistant Deputy Minister or
Designate

Elan Symes
Signature

Oct 5/16
Date

PRIVACY IMPACT ASSESSMENT

Initiative Update

This document is used for a change to an initiative involving the collection, use, disclosure, security, storage, accuracy, correction, or retention of personal information where a PIA has already been completed. If a change does not involve one of these elements, then an updated PIA is not needed. If the change involves many of these elements, you may need to prepare a new PIA instead of using this document. For any questions regarding this document, please contact the Legislation, Privacy, and Policy Branch at (250) 356-1851 or privacy.helpline@gov.bc.ca.

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

Ministry of Finance – SBC/Maximus Tier 1 Call Centre
PIA# FIN18049

2. Ministry/Public Body and Program Area.

Ministry	Finance
Division	Revenue
Branch/Section	Property Taxation Branch
Initiative Title	SBC/Maximus Tier 1 Call Centre Update for Speculation and Vacancy Tax

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

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

Name, Title	Kally Khaira
Branch/Section	Property Taxation Branch
Phone Number	778 698-9536
E-Mail	Kally.Khaira@gov.bc.ca

4. 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

5. Description of the revision.

This PIA update is to update FIN18049 with the following new program:

Program	Function	Enabling Legislation
Speculation and Vacancy Tax (SVT)	An annual tax paid by owners of residential properties in designated taxable regions of B.C. The tax is designed to discourage housing speculation and people from leaving homes vacant in B.C.'s major urban centres.	<i>Budget Measures Implementation (Speculation and Vacancy Tax) Act</i>

Change	Brief Description	FOIPP Authority / Rationale in Brief
Collection and use of personal information	SBC/Maximus agents answer all SVT calls that are routed to them. Agents will validate the caller by requesting details such as first name, last name, property address, mailing address, folio number. Other personal identifiers will not be viewable by the agents.	26(c) and 26(a) per <i>Budget Measures Implementation (Speculation and Vacancy Tax) Act</i> Section 120(5)(h) 27(1)(b) per 33.2(d)
Collection and use of personal information	SBC/Maximus agents may enter or amend declaration information if requested by caller. This process will require collection of Social Insurance Number, Date of Birth, Name, Address, Residency and their use of the residence (principal residence or rented to another individual). See PIA 18061 for details on declaration process.	26(c) and 26(a) per <i>Budget Measures Implementation (Speculation and Vacancy Tax) Act</i> Section 64 and 120(5)(h) 27(1)(b) per 33.2(d)
Collection and use of personal information	Agents may update a mailing address to resend the declaration letter. Agents are unable to make a permanent address update. The caller would be directed to contact the BC Assessment Office for address updates. Agents can provide confirmation that the owner's declaration was received and provide account balance information. Agents will not be able to view details of the declaration or any payment details.	26(c), 27(1)(b) per 33.2(d) 32(a)

6. Purpose/Objectives of the revision (if statutory, provide citation).

The speculation and vacancy tax (SVT) is designed to prevent housing speculation and help turn vacant and underutilized properties into homes for people who live and work in B.C. The tax is a part of the B.C. government's *Homes for BC: A 30-Point Plan for Housing Affordability in British Columbia* to address the housing crisis and help make life more affordable for people. The *Budget Measures Implementation (Speculation and Vacancy Tax) Act*, which would enact SVT, was introduced on October 16, 2018. This annual tax is payable by owners of residential property in designated taxable regions of B.C. The administration of the new tax will be the responsibility of the Revenue Division with the Tier 1 call centre support provided by Service BC/Maximus.

7. What are the potential impacts of this proposal?

No additional impacts have been identified as a result of this initiative that have not already been addressed under the original PIA.

Ministry Comments:

Privacy, Compliance and Training Branch Review and Comments:

Jessica Bouchard

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

Signature

Date

X SIGNATURES

PUBLIC BODY APPROVAL:

_____ Program Manager	_____ Signature	_____ Date
_____ Ministry Contact Responsible for Systems Maintenance and Security [for changes to security, an upgrade to an existing system or change from face- to-face to online services]	_____ Signature	_____ Date
_____ Assistant Deputy Minister or Equivalent	_____ Signature	_____ Date

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

Patriarche, Kerry FIN:EX

From: Demianchuk, Janette FIN:EX
Sent: February 5, 2019 4:37 PM
To: Goss, Jordan T FIN:EX; Brouwer, Deborah FIN:EX; Emery, Steven B FIN:EX
Subject: RE: PIA's used by Service BC

Hi,

The PIA that will cover ESIT-AS (and their sub-contractor) assisting with the Tier 1 calls for Speculation Tax has been submitted to the Privacy Compliance and Training Branch and they have confirmed they should be able to complete their review by end of day tomorrow.

Thanks,
Janette

From: Goss, Jordan T FIN:EX
Sent: February 5, 2019 3:09 PM
To: Brouwer, Deborah FIN:EX
Cc: Emery, Steven B FIN:EX ; Demianchuk, Janette FIN:EX
Subject: RE: PIA's used by Service BC

Thanks. I am going to set up some time for us to discuss 18049 as I want to better understand that one and the issues.

Jordan Goss
250 387-0665

From: Brouwer, Deborah FIN:EX
Sent: Tuesday, February 5, 2019 9:02 AM
To: Goss, Jordan T FIN:EX <Jordan.Goss@gov.bc.ca>
Cc: Emery, Steven B FIN:EX <Steven.Emery@gov.bc.ca>; Demianchuk, Janette FIN:EX <Janette.Demianchuk@gov.bc.ca>
Subject: FW: PIA's used by Service BC
Importance: High

Hi Jordan – Janette's answered your questions below.

From: Demianchuk, Janette FIN:EX
Sent: February 5, 2019 8:19 AM
To: Brouwer, Deborah FIN:EX <Deborah.Brouwer@gov.bc.ca>; Emery, Steven B FIN:EX <Steven.Emery@gov.bc.ca>
Subject: FW: PIA's used by Service BC
Importance: High

I'll start on the PIA.

18049 has not been signed as it's waiting for the CIPA that ITB is completing. As 18049 had not yet been signed, PCTB agreed for us to amend it to include SVT. This means 18070 (the initiative update) will not be used.

18049 is almost complete other than I'm trying to get the collection notice that is provided to people when they call in as it needs to be included. I'm a bit worried there isn't a collection notice right now. Let me know if you want more information on that. I emailed Kally and Rick about it yesterday. Once I get that information I will resubmit to PCTB for their review and it will get signed once the CIPA is approved.

All PIA's are saved here:

O:\PTB R Administration\293 Information and Privacy - Protection of Privacy\60 Privacy Impact Assessments

From: Goss, Jordan T FIN:EX
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To: Brouwer, Deborah FIN:EX <Deborah.Brouwer@gov.bc.ca>
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Subject: RE: PIA's used by Service BC
Importance: High

Thanks

Just a few questions – where do you keep the final versions of the signed PIAs? Is there a completed version of 18049?

We do need a PIA – similar to 18070 for ESIT (and potentially their subcontractor) to support our SVT calls and we need to have it done immediately so that it isn't holding us up and getting them up and running to answer our calls with us. Thanks.

Jordan Goss
250 387-0665

From: Brouwer, Deborah FIN:EX
Sent: Monday, February 4, 2019 2:14 PM
To: Goss, Jordan T FIN:EX <Jordan.Goss@gov.bc.ca>
Cc: Emery, Steven B FIN:EX <Steven.Emery@gov.bc.ca>; Demianchuk, Janette FIN:EX <Janette.Demianchuk@gov.bc.ca>
Subject: RE: PIA's used by Service BC

Hi Jordan – Janette was able to find these. Please let us know if we need an update to 16034.

FIN 16034 – Tier One PIA for ESIT – Sept 2016
FIN 18049 – Tier One PIA for Maximus – Sept 2018
FIN 18070 – Tier One PIA for Maximum SVT – current

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Deb

I am hoping that you are able to provide me a copy of the PIAs that we have in place for SVT as well as the PIA referenced below – 16034 so that I can look and see what more we may need to add to cover off ESIT-AS to support us in taking SVT calls. Thanks.

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Cc: Eason, Jeannette CITZ:EX <Jeannette.Eason@gov.bc.ca>; Mousseau, Jeff CITZ:EX <Jeff.Mousseau@gov.bc.ca>
Subject: PIA's used by Service BC

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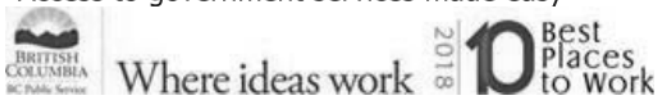
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Please use this PIA as the basis for further action.

Cheers
RB

Russell Bell
A/Director, Contact Centres
Service BC
Ministry of Citizens' Services
T: 250 952 6854 | M: 250-507-9572 | Web: <http://www.servicebc.gov.bc.ca>
"Access to government services made easy"



Patriarche, Kerry FIN:EX

From: Demianchuk, Janette FIN:EX
Sent: February 6, 2019 4:12 PM
To: Lance, Cole CITZ:EX
Cc: Tailleur, Roger FIN:EX; Dewar, Pia FIN:EX; Barlow, Richard O FIN:EX; Bouchard, Jessica CITZ:EX; Brouwer, Deborah FIN:EX
Subject: RE: PIA FIN18070 and PIA FIN18049
Attachments: FIN18049 - PIA_PTB Tier 1 - Feb 1.doc

Hi Cole,

Attached is the updated, with tracked changes, FIN18049.

Please let me know of any questions.

Thanks!

Janette

From: Lance, Cole CITZ:EX
Sent: January 28, 2019 11:16 AM
To: Demianchuk, Janette FIN:EX ; Bouchard, Jessica CITZ:EX
Cc: Tailleur, Roger FIN:EX ; Dewar, Pia FIN:EX ; Barlow, Richard O FIN:EX
Subject: RE: PIA FIN18070 and PIA FIN18049

Hello Janette,

Thank you for reaching out about updating FIN18049. I'm on-board and I'll keep an eye out for an updated version of FIN18049 with track changes to be coming my way. Please let me know if you have any other questions,

Cheers,
Cole

Cole Lance (he/him)
Privacy Advisor
Privacy, Compliance and Training Branch
(778) 698-5837

From: Demianchuk, Janette FIN:EX
Sent: January 25, 2019 3:26 PM
To: Bouchard, Jessica CITZ:EX <Jessica.Bouchard@gov.bc.ca>; Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>
Cc: Tailleur, Roger FIN:EX <Roger.Tailleur@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>
Subject: PIA FIN18070 and PIA FIN18049

Hi Jessica and Cole,

As you are probably aware, there is a lot of scrutiny being put on the new speculation and vacancy tax. FIN18070 and FIN18049 have both been reviewed by PCTB, however have not been signed off yet as we are waiting for the CIPA to be completed. I am wondering if we could please update FIN18049 with the information that is in FIN18070 (the initiative update) and expand on the TACS system access that is already in FIN18049? This will help us close some gaps we recently identified when finalizing the CIPA. Can you please let me know at your earliest convenience if you agree to this process, and I will update the FIN18049 with tracked changes.

Feel free to call me with any questions.

Thanks very much,

Janette Demianchuk
Legislative and Policy Analyst
Property Taxation Branch
Ministry of Finance
☎ 778-698-9164



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

Part 1 – General

Name of Ministry:	Ministry of Finance		
PIA Drafter:	Roger Tailleir, Policy and Legislative Analyst, Property Taxation Branch		
Email:	Roger.Tailleir@gov.bc.ca	Phone:	(778) 698-3878
Program Manager:	Louise Ford, Manager, Systems Operations & Policy, Property Taxation Branch Kally Khaira, Director, Annual Property Tax		
Email:	Louise.Ford@gov.bc.ca	Kally.Khaira@gov.bc.ca	Phone: (778) 698-3962/9536

1. Description of the Initiative

The Ministry of Finance (FIN) administers the following four programs:

Program	Function	Enabling Legislation
Rural Property Tax (RPT)	Levied and collected by PTB in areas of the province outside of municipalities, regional districts and other minor taxing jurisdictions.	<i>Taxation Rural Area Act (TRAA)</i>
Home Owner Grant (HOG)	Grant program to reduce property taxes available to homeowners that pay property taxes to a municipality or to the province if they live in a rural area.	<i>Home Owner Grant Act (HOGA)</i>
Property Tax Deferment (PTD)	Low interest loan available to qualifying homeowners allowing deferment of a portion or all of their residential and farm class property taxes.	<i>Land Tax Deferment Act (LTDA)</i>
Property Transfer Tax (PTT)	Registration tax payable upon the purchase or gain of an interest in property that is registered at the Land Title Office.	<i>Property Transfer Tax Act (PTTA)</i>
<u>Speculation and Vacancy Tax (SVT)</u>	<u>An annual tax paid by owners of residential properties in designated taxable regions of B.C. The tax is designed to discourage housing speculation and people from leaving homes vacant in B.C.'s major urban centres.</u>	<u><i>Speculation and Vacancy Tax Act (SVTA)</i></u>

FIN receives a very high volume of contact from its clients (rural taxpayers, municipalities, lawyers, notaries and accountants, etc). Contact is made by the following interaction channel types: telephone calls; emails; mail; fax; online applications; and Service BC (SBC) Centres. Contact volumes vary throughout the year - ranging from extremely high during peak tax season to moderate the remainder of the year. A high proportion of the total contact made by clients is by telephone.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

As part of an initiative to improve customer service and streamline branch processes, FIN has entered into a service arrangement with SBC ~~and for~~ its service provider, currently Maximus Canada (Maximus), to operate a Tier 1-level call centre for the following ~~three-four~~ FIN program areas: RPT, HOG, ~~and~~ PTD and SVT.

FIN uses the Computer Talk Technology Inc. (ComputerTalk) Ice Control Centre to channel calls, provide voice messaging and scripting, and to record voice messages received from clients. Incoming calls received by FIN's phone system will be routed to one of two streams, based on the option the caller selects in the phone tree:

- PTT
- All other calls (RPT, HOG, PTD, SVT).

PTT calls will continue to be actioned by FIN staff. FIN's phone system will automatically re-route all RPT, HOG, ~~and~~ PTD and SVT calls to Maximus, who will:

- respond directly to Tier 1-level calls by providing publicly available information as requested, and also personal information, such as account balances;
- add memos to accounts describing the action taken on the client's file (i.e. contact information updates, forms sent out, replacement notices with updated address sent, etc);
- transfer all Tier 2-level calls (i.e. questions that require a judgment/decision or expertise at a level higher than basic level) to the appropriate FIN program area;
- for SVT, enter or amend declaration information if requested by caller. This process will require collection of Social Insurance Number, Date of Birth, Name, Address, Residency and their use of the residence (principal residence or rented to another individual). See PIA 18061 for details on declaration process.
- For SVT, update a mailing address to resend the declaration letter for SVT. Agents are unable to make a permanent address update. The caller would be directed to contact the BC Assessment Office for address updates. Agents can provide confirmation that the owner's declaration was received and provide account balance information. Agents will not be able to view details of the declaration or any payment details.
- email information to callers, including personal information such as account balances, if requested by taxpayer.

Maximus will use BC Government IDIR accounts and emails will be stored on BC Government systems. Emails will be sent from a government generic email account and will include a 'no reply' message.

By diverting calls for basic questions or for account balances to Maximus, FIN will be able to more effectively and promptly respond to complex and/or more time-consuming questions and



Privacy Impact Assessment for *Ministry of Finance – SBC/Maximus Tier 1 Call Centre*

PIA# FIN18049

information requests. The Tier 1 call centre will thereby enable FIN staff to better focus on their core program administration and processing duties.

As part of their duties, Maximus will need to collect, use and disclose the personal information of FIN clients. They will use the following FIN systems: Gentax (TACS); Revenue Management System (RMS-CRM); Tax Deferment Application (TDA); and the public off-line version of the eTaxBC portal.

As part of the service provided, Maximus will:

- view account data in order to verify a client's identity;
- provide answers to basic questions once the identity of the caller has been verified;
- inform the client where to find information online; and,
- email documents to the address provided by the client, as requested.

In some cases, they will provide account-specific information to callers, once they have verified the caller's identity and ensured the caller is authorized to receive the information. Questions requiring the use and disclosure of personal information that is beyond the scope of Tier 1 questions, will be transferred to PTB staff.

While the initial roll out of the SBC/Maximus call centre will include the RPT, HOG, ~~and~~ PTD, and SVT it is envisioned that other FIN programs will onboard in future phases. The collection, use, disclosure, storage and security of personal information for these additional FIN programs would be consistent with those authorities documented here.

When personal information is involved:

- agents follow a strict caller verification process to ensure the caller is authorized to receive the information requested
- knowledge base scripts identify the verification criteria specific to each of the following:
 - account holder (homeowner)
 - third party (i.e., bank, power of attorney, executor, etc.)
- once/if it is determined that the caller is authorized to receive the information, the agent provides it verbally, or by email, if the citizen requests it.
- if the agent determines the caller is not authorized to receive the information, the agent transfers the call to the appropriate Tier 2 program area.

2. Scope of this PIA



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

This PIA specifically covers the services provided to FIN by the SBC/Maximus Tier 1 call centre. It includes the limited access to FIN systems (stated above) required by Maximus to collect, use and disclose clients' personal information, which is stored in FIN systems.

3. Related Privacy Impact Assessments

Existing PIAs for FIN Systems and for Previous Tier 1 Call Centre

<u>Software Name</u>	<u>PIA</u>
Gentax (TACS)	FIN13029-TACS V9 Upgrade and FIN18067 Initiative Update
Revenue Management System (RMS-CRM)	RMS Overarching PIA FIN15033
Tax Deferment Application (TDA)	Land TDA PIA FIN16016, and PIBS FIN_295
PTB ICE Control Centre	ICEAnywhere Phone System FIN15032
eTaxBC	FIN13029-TACS V9 Upgrade
HPAS Tier 1 Call Centre for PTB	FIN16034



Privacy Impact Assessment for *Ministry of Finance – SBC/Maximus Tier 1 Call Centre*

PIA# FIN18049

4. Elements of Information or Data

Maximus will collect, use and disclose those elements of information/data that are required to provide services to clients within the following programs: rural property taxes, home owner grants, ~~and~~ property tax deferment, and speculation and vacancy tax.

This includes the following types of personal information:

- Name
- Age (in some cases)¹
- Social Insurance Number - for SVT
- Address
- Residency (Canadian citizen or permanent resident and BC residency) – for SVT
- Work/home email address
- Work/home phone number
- Financial institution (in some cases)
- Financial information relating to client accounts.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

The information will be stored in BC Government data centres in Canada and will only be accessible within Canada.

¹ There are age requirements for some of our programs, such as: additional home owner grant for seniors; tax deferment available for 55+ years of age.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

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. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.

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;	no
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.	no

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. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

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. The documentation is in progress at this time.	yes



Privacy Impact Assessment for **Ministry of Finance – SBC/Maximus Tier 1** **Call Centre** PIA# FIN18049

8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Inbound caller selects on option from the call tree menu. All PTT-related calls are routed to the PTT program area, while all other options route the call to the SBC/Maximus call centre phone system.	No PI	N/A
2.	SBC/Maximus agents answer all non-PTT calls that are routed to them. Agents determine whether the call is at the Tier 1 or Tier 2 level. Agents transfer Tier 2 level calls to the appropriate PTB program area.	Collection; use; disclosure	26(c) 27(1)(b) [33.2(d)], 27(1)(e) 32(a) 33.2(a) 33.2(d) For SVT: 26(c) and 26(a) per <i>Speculation and Vacancy Tax Act</i> Section 120(5)(h)
3.	SBC/Maximus agents respond to Tier 1-level questions/requests that involve publicly-available (non-personal) information, and also personal information. <u>For SVT Only: Agents may enter or amend declaration information if requested by caller and update an address to resend a declaration letter. Declaration information is entered directly into the system and requires the agent to complete a section of the application confirming they have entered it on behalf of the individual.</u>	Collection; use; disclosure	26(c) 27(1)(b) [33.2(d)], 27(1)(e) 32(a) 33.2(a) 33.2(d) For SVT: 26(c) and 26(a) per <i>Speculation and Vacancy Tax Act</i> Section 120(5)(h)
4.	SBC/Maximus agents send requested	Use; Disclosure	32(a)

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Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

information (i.e., forms, account balances, etc) to clients by email.	33.2(a) 33.2(d)
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9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	SBC/Maximus agents access and use personal information for unauthorized purposes.	Contractual Agreement and/or Workplace Ethics Procedures	Low	High
2.	Individual calling for information on an account may not be the holder of that account.	SBC/Maximus agents follow a strict caller verification process prior to disclosing information to ensure the caller is authorized to receive the information requested.	Low	High
3.	SBC/Maximus agents send emails to the wrong recipient(s).	SBC/Maximus agents are instructed to read back the email address to the client before sending, to ensure it is going to the correct recipient(s).	Low	High

10. Collection Notice

The following collection notice is provided to callers for HOG, PTT, RPT and PTD.

Your personal information may be collected for the purpose of administering the Home Owner Grant Act, Property Transfer Tax Act, Land Tax Deferment Act and the Taxation Rural Area Act under section 26(a) and (c) of the Freedom Of Information and Protection of Privacy Act. Further questions or concerns about the collection, use, or disclosure of this information can be directed to Property Taxation Branch Administration at PO BOX 9991 Stn Prov Govt, Victoria BC V8W 9R7 or by phone at 778-698-3903.

The following collection notice will be provided to callers for SVT.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

Your personal information may be collected for the purpose of administering the Speculation and Vacancy Tax Act under the authority of 26(a) and 26(c) of the Freedom of Information and Protection of Privacy Act. Questions about the collection of this information can be directed to the Director, Annual Property Tax, Ministry of Finance, PO Box 9472 Stn Prov Govt, Victoria BC V8W 9W6 or by phone at 778-698-9536.

PIA# FIN16045 covers the collection notice recording that is played to callers when they initially connect with the PTB phone system.

Part 3 – Security of Personal Information

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

Maximus Canada's security measures are out of scope. PIA# MTICS16066 – Service BC Contact Centre Services speaks to the physical and technical security measures of this service provider.

FIN data is stored at Canadian data centres, which maintain several levels of physical security. The data centre has 24-hour security and access to the building and floors is protected by a door access system.

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

Taxpayer information, including personal information, is stored electronically in FIN systems and will be accessed by SBC/Maximus agents through password-protected computers. System access for Maximus agents is obtained through the following process: an SBC manager forwards the names of the new hires (with IDIR accounts) to the appropriate designated FIN systems operations employee; the request is forwarded to FIN Information Management Branch (IMB); IMB provides access for TACS, and requests access to RMS-CRM, from ESIT Advanced Solutions. When employees leave Maximus, their access is revoked by the same process.

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

FIN's security policies are consistent with the BC Government's information security policy.

An electronic monitoring process will continually track the use of Gentax (TACS), RMS-CRM, and TDA by SBC/Maximus agents to ensure there is no unauthorized access and use. This is addressed by PIA #####.

Commented [DJF1]: Removed as this is covered under #15.

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.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

FIN has provided SBC/Maximus with knowledge base scripts that identify strict procedures and circumstances whereby changes to personal information can be made. An electronic monitoring process will continually track the use of Gentax (TACS), RMS-CRM, TDA, and eTax by SBC/Maximus agents to ensure unauthorized changes to personal information are not made.

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

Only agents requiring the use of FIN systems as part of their duties have password-protected access. Systems have audit logging and access restrictions that will record who accessed the system, at the account level, and when.

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?

FIN has provided SBC/Maximus with knowledge base scripts that identify strict procedures for the updating of clients' personal information. Maximus will update contact information in FIN data systems during or immediately after the call. Maximus also enter summary notes about the information provided, action taken, etc into the system. Through FIN systems, this information is accessible by FIN staff.

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

No. Maximus will use personal information (such as age) to provide guidance as to whether a taxpayer is eligible for a particular program and will provide a response based on that information. However, Maximus will not make a judgment or decision based on the personal information received. FIN remains the decision maker under the FIN programs.

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.

N/A

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?

N/A



Privacy Impact Assessment for
Ministry of Finance – SBC/Maximus Tier 1
Call Centre
PIA# FIN18049

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.
No.
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?
No.



Privacy Impact Assessment for *Ministry of Finance – SBC/Maximus Tier 1 Call Centre* PIA# FIN18049

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.

Alan Arslan
Privacy Advisor
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Finance

Signature

Date

Holly Romanow
Senior Privacy Advisor
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Finance

Signature

Date



Privacy Impact Assessment for
Ministry of Finance – SBC/Maximus Tier 1
Call Centre
PIA# FIN18049

Part 7 – Program Area Comments and Signatures

Commented [DJF2]: I need to fix the signature page.

Kally Khaira

~~Louise Ford~~

~~Manager, System Operations and Policy~~ Director, Annual Property Tax
Property Taxation Branch
Ministry of Finance

Signature

Date

Richard Barlow

~~Richard Barlow~~

Director of Information Security and Privacy
Corporate and Ministry Support Services
Information Management Branch
Ministry of Finance

Signature

Date

Steven Emery

Executive Director

Property Taxation Branch

Ministry of Finance

Signature

Date

Jordan Goss

Jordan Goss

Assistant Deputy Minister or Designate

Revenue Division

Ministry of Finance

Signature

Date

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13

Patriarche, Kerry FIN:EX

From: Lance, Cole CITZ:EX
Sent: March 6, 2019 3:25 PM
To: Lovell, Claire FIN:EX
Cc: Dewar, Pia FIN:EX; Clarke, Treana FIN:EX; Demianchuk, Janette FIN:EX
Subject: RE: PIA FIN18049

Hi Claire,

Once the CIPA is ready I will assist in getting the PIA and CIPA submitted to the OIPC for review. This requirement for the OIPC review is a result of the CIPA being required and stems from section 69 (5.2) of FOIPPA. Please keep me informed and we will move forward from there, and let me know if you have any questions in the meantime,

Thank you,
Cole

From: Lovell, Claire FIN:EX
Sent: March 6, 2019 10:30 AM
To: Demianchuk, Janette FIN:EX
Cc: Lance, Cole CITZ:EX ; Dewar, Pia FIN:EX ; Clarke, Treana FIN:EX
Subject: RE: PIA FIN18049

Hi Janette,

Treana and I have a meeting with Jordan this afternoon to discuss the CIPA. I will provide a follow-up later today. In regards to notifying OIPC, we were under the impression that if a PIA needed to be reviewed by OIPC, that PCT would elevate the PIA. This is our first CIPA, so if this is not the practice, please advise.

Thanks,

Claire Lovell

Project Officer, Intergovernmental Relations
Income Tax Advisory and Intergovernmental Relations

From: Demianchuk, Janette FIN:EX
Sent: March 6, 2019 9:09 AM
To: Lovell, Claire FIN:EX <Claire.Lovell@gov.bc.ca>
Cc: Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Clarke, Treana FIN:EX <Treana.Clarke@gov.bc.ca>
Subject: FW: PIA FIN18049

Hi Claire,

Are you able to provide Cole an update on the CIPA? – and any updates related to the OIPC?

Thanks!
Janette

From: Lance, Cole CITZ:EX
Sent: March 6, 2019 9:00 AM
To: Demianchuk, Janette FIN:EX <Janette.Demianchuk@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>
Subject: RE: PIA FIN18049

Hi Janette and Pia,

I just wanted to check in to see how the CIPA was coming along. In reviewing PIA# FIN19013 I noticed it referenced FIN18049 and the CIPA. I also noticed that there hasn't been any discussion about the CIPA going through the OIPC for review. Pia, are you aware of progress made with the OIPC reviewing this CIPA? My apologies if I'm missing something, I just wanted to check in and see if we should be taking steps in that direction now in addition to reviewing FIN19013 and signing FIN18049.

Please let me know your thoughts and we can go from there,
Thank you,
Cole

Cole Lance (he/him)
Privacy Advisor
Privacy, Compliance and Training Branch
(778) 698-5837

From: Demianchuk, Janette FIN:EX
Sent: February 22, 2019 12:09 PM
To: Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>
Cc: Lovell, Claire FIN:EX <Claire.Lovell@gov.bc.ca>
Subject: RE: PIA FIN18049

Thanks very much Cole.

I'm attaching the version I have now saved with the fixed signature page at the end. I'll let you know as soon as the CIPA is signed.

Thanks for your support on this one!

Janette

From: Lance, Cole CITZ:EX
Sent: February 22, 2019 10:34 AM
To: Demianchuk, Janette FIN:EX <Janette.Demianchuk@gov.bc.ca>
Subject: RE: PIA FIN18049

Hi Janette,

These changes look good to me! I see you left a comment noting that you are going to update the signature page, I've attached a clean version here. Please let me know when the CIPA is signed and we will get this PIA signed off after that.

Cheers,
Cole

Cole Lance (he/him)

From: Demianchuk, Janette FIN:EX
Sent: February 15, 2019 11:02 AM
To: Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>
Cc: Lovell, Claire FIN:EX <Claire.Lovell@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>; Brouwer, Deborah FIN:EX <Deborah.Brouwer@gov.bc.ca>
Subject: PIA FIN18049

Hi Cole,

Updated version for your review please.

Thanks!
Janette

From: Demianchuk, Janette FIN:EX
Sent: February 11, 2019 12:05 PM
To: Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>
Subject: RE: PIA FIN18070 and PIA FIN18049
Importance: High

Hi Cole,

As you may know, we are currently working on a PIA for ESIT-AS to answer spec tax calls as well, so it is similar to the 18049 PIA. Some things came up on the weekend that will also need to be reflected on the 18049 PIA that is with you for review. Can you please hold off on reviewing and I'll send you an updated version. Sorry!

From: Demianchuk, Janette FIN:EX
Sent: February 6, 2019 4:12 PM
To: Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>
Cc: Tailleir, Roger FIN:EX <Roger.Tailleir@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>; Bouchard, Jessica CITZ:EX <Jessica.Bouchard@gov.bc.ca>; Brouwer, Deborah FIN:EX <Deborah.Brouwer@gov.bc.ca>
Subject: RE: PIA FIN18070 and PIA FIN18049

Hi Cole,

Attached is the updated, with tracked changes, FIN18049.

Please let me know of any questions.

Thanks!

Janette

From: Lance, Cole CITZ:EX
Sent: January 28, 2019 11:16 AM
To: Demianchuk, Janette FIN:EX <Janette.Demianchuk@gov.bc.ca>; Bouchard, Jessica CITZ:EX

<Jessica.Bouchard@gov.bc.ca>

Cc: Tailleux, Roger FIN:EX <Roger.Tailleux@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>

Subject: RE: PIA FIN18070 and PIA FIN18049

Hello Janette,

Thank you for reaching out about updating FIN18049. I'm on-board and I'll keep an eye out for an updated version of FIN18049 with track changes to be coming my way. Please let me know if you have any other questions,

Cheers,
Cole

Cole Lance (he/him)
Privacy Advisor
Privacy, Compliance and Training Branch
(778) 698-5837

From: Demianchuk, Janette FIN:EX

Sent: January 25, 2019 3:26 PM

To: Bouchard, Jessica CITZ:EX <Jessica.Bouchard@gov.bc.ca>; Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>

Cc: Tailleux, Roger FIN:EX <Roger.Tailleux@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>

Subject: PIA FIN18070 and PIA FIN18049

Hi Jessica and Cole,

As you are probably aware, there is a lot of scrutiny being put on the new speculation and vacancy tax. FIN18070 and FIN18049 have both been reviewed by PCTB, however have not been signed off yet as we are waiting for the CIPA to be completed. I am wondering if we could please update FIN18049 with the information that is in FIN18070 (the initiative update) and expand on the TACS system access that is already in FIN18049? This will help us close some gaps we recently identified when finalizing the CIPA. Can you please let me know at your earliest convenience if you agree to this process, and I will update the FIN18049 with tracked changes.

Feel free to call me with any questions.

Thanks very much,

Janette Demianchuk
Legislative and Policy Analyst
Property Taxation Branch
Ministry of Finance
☎ 778-698-9164

Patriarche, Kerry FIN:EX

From: Khaira, Kally FIN:EX
Sent: May 7, 2019 4:13 PM
To: Dewar, Pia FIN:EX
Subject: RE: FIN18070 Query
Attachments: RE: Question FIN18070 Query

Hi Pia, we cancelled the above PIA according to Janette. See attached email.

Kally Khaira
Director, Annual Property Tax
t: 778.698.9536 | c: 250.893.7102

From: Dewar, Pia FIN:EX
Sent: May 7, 2019 3:21 PM
To: Khaira, Kally FIN:EX
Subject: FIN18070 Query

Good afternoon Kally,

I'm in the process of following up on open PIAs in Finance, and I'm just wondering about the status of FIN18070 (Update to FIN18049). The last communication I have is dated March 6th 2019, and you are listed as the point of contact at that time. The last email seemed to indicate that it was pending sign-off when FIN18049 was approved and signed and there has been some movement in this area recently. If this PIA is completed (as a result of that), may I please have a copy for our records? Alternatively, any information on the current status of this PIA would be appreciated.

Thank you,

Pia Dewar, MLIS – Privacy & Security Analyst
Ministry of Finance, Corporate Services, Information Management Branch
Supporting Finance, Office of the Premier, various agencies, boards, & commissions
Cell: 778-678-1921

Pia Dewar, MLIS – Privacy & Security Analyst
Ministry of Finance, Corporate Services, Information Management Branch
Supporting Finance, Office of the Premier, various agencies, boards, & commissions
Cell: 778-678-1921

Patriarche, Kerry FIN:EX

From: Demianchuk, Janette FIN:EX
Sent: May 7, 2019 4:09 PM
To: Khaira, Kally FIN:EX
Subject: RE: Question FIN18070 Query

Hi, Yes. 18070 never moved forward. Instead we updated 18049 (which is the one you signed last week). So 18070 is cancelled.

From: Khaira, Kally FIN:EX
Sent: May 7, 2019 4:07 PM
To: Demianchuk, Janette FIN:EX
Subject: Question FIN18070 Query

Hi, would you happen to know what PIA, Pia is referring to?

Kally Khaira
Director, Annual Property Tax
t: 778.698.9536 | c: 250.893.7102

From: Dewar, Pia FIN:EX
Sent: May 7, 2019 3:21 PM
To: Khaira, Kally FIN:EX <Kally.Khaira@gov.bc.ca>
Subject: FIN18070 Query

Good afternoon Kally,

I'm in the process of following up on open PIAs in Finance, and I'm just wondering about the status of FIN18070 (Update to FIN18049). The last communication I have is dated March 6th 2019, and you are listed as the point of contact at that time. The last email seemed to indicate that it was pending sign-off when FIN18049 was approved and signed and there has been some movement in this area recently. If this PIA is completed (as a result of that), may I please have a copy for our records? Alternatively, any information on the current status of this PIA would be appreciated.

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Ministry of Finance, Corporate Services, Information Management Branch
Supporting Finance, Office of the Premier, various agencies, boards, & commissions
Cell: 778-678-1921

Patriarche, Kerry FIN:EX

From: Dewar, Pia FIN:EX
Sent: May 8, 2019 1:25 PM
To: Khaira, Kally FIN:EX
Subject: RE: FIN18070 Query

Hi Kally,

Thank you for clearing that up for me!

Pia Dewar, MLIS – Privacy & Security Analyst
Ministry of Finance, Corporate Services, Information Management Branch
Supporting Finance, Office of the Premier, various agencies, boards, & commissions
Cell: 778-678-1921

From: Khaira, Kally FIN:EX
Sent: May 7, 2019 4:13 PM
To: Dewar, Pia FIN:EX
Subject: RE: FIN18070 Query

Hi Pia, we cancelled the above PIA according to Janette. See attached email.

Kally Khaira
Director, Annual Property Tax
t: 778.698.9536 | c: 250.893.7102

From: Dewar, Pia FIN:EX
Sent: May 7, 2019 3:21 PM
To: Khaira, Kally FIN:EX <Kally.Khaira@gov.bc.ca>
Subject: FIN18070 Query

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I'm in the process of following up on open PIAs in Finance, and I'm just wondering about the status of FIN18070 (Update to FIN18049). The last communication I have is dated March 6th 2019, and you are listed as the point of contact at that time. The last email seemed to indicate that it was pending sign-off when FIN18049 was approved and signed and there has been some movement in this area recently. If this PIA is completed (as a result of that), may I please have a copy for our records? Alternatively, any information on the current status of this PIA would be appreciated.

Thank you,

Pia Dewar, MLIS – Privacy & Security Analyst
Ministry of Finance, Corporate Services, Information Management Branch
Supporting Finance, Office of the Premier, various agencies, boards, & commissions
Cell: 778-678-1921

FIN FOI CSD FIN:EX

From: Demianchuk, Janette FIN:EX
Sent: February 15, 2019 11:02 AM
To: Lance, Cole CITZ:EX
Cc: Lovell, Claire FIN:EX; Dewar, Pia FIN:EX; Barlow, Richard O FIN:EX; Brouwer, Deborah FIN:EX
Subject: PIA FIN18049
Attachments: FIN18049 - PIA_PTB Tier 1 - Feb 14.doc

Hi Cole,

Updated version for your review please.

Thanks!
Janette

From: Demianchuk, Janette FIN:EX
Sent: February 11, 2019 12:05 PM
To: Lance, Cole CITZ:EX
Subject: RE: PIA FIN18070 and PIA FIN18049
Importance: High

Hi Cole,

As you may know, we are currently working on a PIA for ESIT-AS to answer spec tax calls as well, so it is similar to the 18049 PIA. Some things came up on the weekend that will also need to be reflected on the 18049 PIA that is with you for review. Can you please hold off on reviewing and I'll send you an updated version. Sorry!

From: Demianchuk, Janette FIN:EX
Sent: February 6, 2019 4:12 PM
To: Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>
Cc: Tailleir, Roger FIN:EX <Roger.Tailleir@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>; Bouchard, Jessica CITZ:EX <Jessica.Bouchard@gov.bc.ca>; Brouwer, Deborah FIN:EX <Deborah.Brouwer@gov.bc.ca>
Subject: RE: PIA FIN18070 and PIA FIN18049

Hi Cole,

Attached is the updated, with tracked changes, FIN18049.

Please let me know of any questions.

Thanks!

Janette

From: Lance, Cole CITZ:EX
Sent: January 28, 2019 11:16 AM
To: Demianchuk, Janette FIN:EX <Janette.Demianchuk@gov.bc.ca>; Bouchard, Jessica CITZ:EX

<Jessica.Bouchard@gov.bc.ca>

Cc: Tailleux, Roger FIN:EX <Roger.Tailleux@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>

Subject: RE: PIA FIN18070 and PIA FIN18049

Hello Janette,

Thank you for reaching out about updating FIN18049. I'm on-board and I'll keep an eye out for an updated version of FIN18049 with track changes to be coming my way. Please let me know if you have any other questions,

Cheers,
Cole

Cole Lance (he/him)
Privacy Advisor
Privacy, Compliance and Training Branch
(778) 698-5837

From: Demianchuk, Janette FIN:EX

Sent: January 25, 2019 3:26 PM

To: Bouchard, Jessica CITZ:EX <Jessica.Bouchard@gov.bc.ca>; Lance, Cole CITZ:EX <Cole.Lance@gov.bc.ca>

Cc: Tailleux, Roger FIN:EX <Roger.Tailleux@gov.bc.ca>; Dewar, Pia FIN:EX <Pia.Dewar@gov.bc.ca>; Barlow, Richard O FIN:EX <Richard.Barlow@gov.bc.ca>

Subject: PIA FIN18070 and PIA FIN18049

Hi Jessica and Cole,

As you are probably aware, there is a lot of scrutiny being put on the new speculation and vacancy tax. FIN18070 and FIN18049 have both been reviewed by PCTB, however have not been signed off yet as we are waiting for the CIPA to be completed. I am wondering if we could please update FIN18049 with the information that is in FIN18070 (the initiative update) and expand on the TACS system access that is already in FIN18049? This will help us close some gaps we recently identified when finalizing the CIPA. Can you please let me know at your earliest convenience if you agree to this process, and I will update the FIN18049 with tracked changes.

Feel free to call me with any questions.

Thanks very much,

Janette Demianchuk
Legislative and Policy Analyst
Property Taxation Branch
Ministry of Finance
☎ 778-698-9164



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

Part 1 – General

Name of Ministry:	Ministry of Finance		
PIA Drafter:	Roger Tailleux, Policy and Legislative Analyst, Property Taxation Branch		
Email:	Roger.Tailleux@gov.bc.ca	Phone:	(778) 698-3878
Program Manager:	Louise Ford, Manager, Systems Operations & Policy, Property Taxation Branch Kally Khaira, Director, Annual Property Tax		
Email:	Louise.Ford@gov.bc.ca Kally.Khaira@gov.bc.ca	Phone:	(778) 698-3962/9536

1. Description of the Initiative

The Ministry of Finance (FIN) administers the following four programs:

Program	Function	Enabling Legislation
Rural Property Tax (RPT)	Levied and collected by PTB in areas of the province outside of municipalities, regional districts and other minor taxing jurisdictions.	<i>Taxation Rural Area Act (TRAA)</i>
Home Owner Grant (HOG)	Grant program to reduce property taxes available to homeowners that pay property taxes to a municipality or to the province if they live in a rural area.	<i>Home Owner Grant Act (HOGA)</i>
Property Tax Deferment (PTD)	Low interest loan available to qualifying homeowners allowing deferment of a portion or all of their residential and farm class property taxes.	<i>Land Tax Deferment Act (LTDA)</i>
Property Transfer Tax (PTT)	Registration tax payable upon the purchase or gain of an interest in property that is registered at the Land Title Office.	<i>Property Transfer Tax Act (PTTA)</i>
<u>Speculation and Vacancy Tax (SVT)</u>	<u>An annual tax paid by owners of residential properties in designated taxable regions of B.C. The tax is designed to discourage housing speculation and people from leaving homes vacant in B.C.'s major urban centres.</u>	<u><i>Speculation and Vacancy Tax Act (SVTA)</i></u>

FIN receives a very high volume of contact from its clients (rural taxpayers, municipalities, lawyers, notaries and accountants, etc). Contact is made by the following interaction channel types: telephone calls; emails; mail; fax; online applications; and Service BC (SBC) Centres. Contact volumes vary throughout the year - ranging from extremely high during peak tax season to moderate the remainder of the year. A high proportion of the total contact made by clients is by telephone.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

As part of an initiative to improve customer service and streamline branch processes, FIN has entered into a service arrangement with SBC ~~and for~~ its service provider, currently Maximus Canada (Maximus), to operate a Tier 1-level call centre for the following ~~three~~ four FIN program areas: RPT, HOG, ~~and~~ PTD and SVT.

FIN uses the Computer Talk Technology Inc. (ComputerTalk) Ice Control Centre to channel calls, provide voice messaging and scripting, and to record voice messages received from clients. ComputerTalk has been previously assessed under PIA FIN15032. Incoming calls received by FIN's phone system will be routed to one of two streams, based on the option the caller selects in the phone tree:

- PTT
- All other calls (RPT, HOG, PTD)

A separate, dedicated phone line has been created specific to SVT calls. The phone line that is specific to SVT calls goes directly to Service BC (Maximus).

PTT calls will continue to be actioned by FIN staff. FIN's phone system will automatically re-route all RPT, HOG, and PTD calls to Maximus. SVT calls go directly to Maximus. For all in scope programs, Maximus, who will:

- respond directly to Tier 1-level calls by providing publicly available information as requested, and also personal information, such as account balances;
- add memos to accounts describing the action taken on the client's file (i.e. contact information updates, forms sent out, replacement notices with updated address sent, etc);
- transfer all Tier 2-level calls (i.e. questions that require a judgment/decision or expertise at a level higher than basic level) to the appropriate FIN program area;
- for SVT, enter or amend declaration information if requested by registered property owner. This process will require collection of Social Insurance Number, Date of Birth, Name, Address, Residency and their use of the residence (e.g., principal residence or rented to another individual). See PIA FIN18061 for details on declaration process.
- For SVT, update a mailing address to resend the declaration letter for SVT. Agents are unable to make a permanent address update. The residential property owner would be directed to contact the BC Assessment Office for address updates.
- For SVT, Agents can provide confirmation that the residential property owner's declaration was received and provide SVT account balance information. If a registered property owner requests details on their declaration beyond if it has been received, they will be transferred to Tier 2. Agents will not be able to view details of the declaration, such as which exemption was selected. Payment details can also not be viewed by agents and if required, will be transferred to Tier 2.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

- email information to callers after validation has been completed, including personal information such as account balances, if requested by taxpayer. Personal information such as SIN and date of birth will never be sent by email.

Maximus will use BC Government IDIR accounts and emails will be stored on BC Government systems. Emails will be sent from a government generic email account and will include a 'no reply' message. Emails will only be used if requested.

By diverting calls for basic questions or for account balances to Maximus, FIN will be able to more effectively and promptly respond to complex and/or more time-consuming questions and information requests. The Tier 1 call centre will thereby enable FIN staff to better focus on their core program administration and processing duties.

As part of their duties, Maximus will need to collect, use and disclose the personal information of FIN clients. They will use the following FIN systems: Gentax (TACS); Revenue Management System (RMS-CRM); Tax Deferment Application (TDA); and the public off-line version of the eTaxBC portal.

As part of the service provided, Maximus will:

- view account data in order to verify a client's identity;
- provide answers to basic questions once the identity of the caller has been verified;
- inform the client where to find information online; and,
- email documents to the address provided by the client, as requested.

In some cases, they will provide account-specific information to callers, once they have verified the caller's identity and ensured the caller is authorized to receive the information. Questions requiring the use and disclosure of personal information that is beyond the scope of Tier 1 questions, will be transferred to PTB staff.

While the initial roll out of the SBC/Maximus call centre will include the RPT, HOG, ~~and~~ PTD, and SVT it is envisioned that other FIN programs will onboard in future phases. The collection, use, disclosure, storage and security of personal information for these additional FIN programs would be consistent with those authorities documented here.

When personal information is involved:

- agents follow a strict caller verification process to ensure the caller is authorized before any information is provided to the caller to receive the information requested such as balance information, or before a declaration is entered (for SVT) or an address update is made.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

- knowledge base scripts identify the verification criteria specific to each of the following:
 - account holder (homeowner)
 - third party (i.e., bank, power of attorney, executor, etc.)
- once/if it is determined that the caller is authorized to receive the information, the agent will provide information verbally, or by email, if the citizen requests it, or enter the declaration (SVT). Personal information such as SIN and date of birth will never be sent by email.
- if the agent determines the caller is not authorized to receive the information, the agent transfers the call to the appropriate Tier 2 program area.

2. Scope of this PIA

This PIA specifically covers the services provided to FIN by the SBC/Maximus Tier 1 call centre. It includes the limited access to FIN systems (stated above) required by Maximus to collect, use and disclose clients' personal information, which is stored in FIN systems.

3. Related Privacy Impact Assessments

Existing PIAs for FIN Systems and for Previous Tier 1 Call Centre

Software Name	PIA
Gentax (TACS)	FIN13029-TACS V9 Upgrade and FIN18067 Initiative Update
Revenue Management System (RMS-CRM)	RMS Overarching PIA FIN15033
Tax Deferment Application (TDA)	Land TDA PIA FIN16016, and PIBS FIN_295
PTB ICE Control Centre	ICEAnywhere Phone System FIN15032
eTaxBC	FIN13029-TACS V9 Upgrade
HPAS Tier 1 Call Centre for PTB	FIN16034



Privacy Impact Assessment for *Ministry of Finance – SBC/Maximus Tier 1 Call Centre*

PIA# FIN18049

4. Elements of Information or Data

Maximus will collect, use and disclose those elements of information/data that are required to provide services to clients within the following programs: rural property taxes, home owner grants, ~~and property tax deferment~~, and speculation and vacancy tax.

This includes the following types of personal information:

- Name
- Age (in some cases)¹/Date of Birth (SVT)
- Social Insurance Number - for SVT
- Address
- Residency (Canadian citizen or permanent resident and BC residency) – for SVT
- Work/home email address
- Work/home phone number
- Financial institution (in some cases)
- Financial information relating to client accounts.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

The information will be stored in BC Government data centres in Canada and will only be accessible within Canada.

¹ There are age requirements for some of our programs, such as: additional home owner grant for seniors; tax deferment available for 55+ years of age.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

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. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.

- | | |
|---|----|
| 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; | no |
| 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. | no |

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. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

- | | |
|--|-----|
| 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. The documentation is in progress at this time. | yes |



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Inbound caller selects an option from the call tree menu. All PTT-related calls are routed to the PTT program area, while all other options route the call to the SBC/Maximus call centre phone system. <u>SVT calls are routed directly to SBC/Maximus.</u>	No PI	N/A
2.	SBC/Maximus agents answer all non-PTT calls that are routed to them. Agents determine whether the call is at the Tier 1 or Tier 2 level. Agents transfer Tier 2 level calls to the appropriate PTB program area.	Collection; use; disclosure	26(c) 27(1)(b) [33.2(d)], 27(1)(e) 32(a) 33.2(a) 33.2(d) <u>For SVT:</u> <u>26(c) and 26(a) per</u> <u>Speculation and</u> <u>Vacancy Tax Act</u> <u>Section 120(5)(h)</u>
3.	SBC/Maximus agents respond to Tier 1-level questions/requests that involve publicly-available (non-personal) information, and also personal information. <u>For SVT Only: Agents may enter or amend declaration information if requested by residential property owner and update an address to resend a declaration letter. This process will require collection of Social</u>	Collection; use; disclosure	26(c) 27(1)(b) [33.2(d)], 27(1)(e) 32(a) 33.2(a) 33.2(d) <u>For SVT:</u> <u>26(c) and 26(a) per</u> <u>Speculation and</u> <u>Vacancy Tax Act</u> <u>Section 120(5)(h)</u>

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Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

	<p>Insurance Number, Date of Birth, Name, Address, Residency and their use of the residence (e.g. their principal residence or rented to another individual.) See PIA 18061 for details on declaration process.</p> <p>Declaration information is entered directly into the system and requires the agent to complete a section of the application confirming they have entered it on behalf of the individual.</p>		
4.	SBC/Maximus agents send requested information (i.e., forms, account balances, etc) to clients by email. Personal information such as SIN and date of birth are never sent by email.	Use; Disclosure	32(a) 33.2(a) 33.2(d)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	SBC/Maximus agents access and use personal information for unauthorized purposes.	Contractual Agreement and/or Workplace Ethics Procedures <u>Role-based security function within TACS restricts access to viewing information once it has been entered and the declaration is complete (SVT).</u>	Low	High
2.	Individual calling for information on an account may not be the holder of that account.	SBC/Maximus agents follow a strict caller verification process prior to disclosing information to ensure the caller is authorized to receive the information requested.	Low	High
3.	SBC/Maximus agents send emails to the wrong recipient(s).	SBC/Maximus agents are instructed to read back the email address to the client before	Low	High

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Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

		sending, to ensure it is going to the correct recipient(s).		
--	--	---	--	--

10. Collection Notice

The following collection notice is provided to callers for HOG, PTT, RPT and PTB.

Your personal information may be collected for the purpose of administering the Home Owner Grant Act, Property Transfer Tax Act, Land Tax Deferment Act and the Taxation Rural Area Act under section 26(a) and (c) of the Freedom Of Information and Protection of Privacy Act. Further questions or concerns about the collection, use, or disclosure of this information can be directed to Property Taxation Branch Administration at PO BOX 9991 Stn Prov Govt, Victoria BC V8W 9R7 or by phone at 778-698-3903.

The following collection notice will be provided to callers for SVT.

Personal information may be collected on this call for the purpose of administering the Speculation and Vacancy Tax Act under the authority of 26(a) and 26(c) of the Freedom of Information and Protection of Privacy Act. Questions about the collection of this information can be directed to the Director, Annual Property Tax, Ministry of Finance, PO Box 9472 Stn Prov Govt, Victoria BC V8W 9W6 or by phone at 778-698-9536.

PIA# FIN16045 covers the collection notice recording that is played to callers when they initially connect with the PTB phone system.

Part 3 – Security of Personal Information

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

Maximus Canada's security measures are out of scope. PIA# MTICS16066 – Service BC Contact Centre Services speaks to the physical and technical security measures of this service provider.

FIN data is stored at Canadian data centres, which maintain several levels of physical security. The data centre has 24-hour security and access to the building and floors is protected by a door access system.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

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

Taxpayer information, including personal information, is stored electronically in FIN systems and will be accessed by SBC/Maximus agents through password-protected computers. System access for Maximus agents is obtained through the following process: an SBC manager forwards the names of the new hires (with IDIR accounts) to the appropriate designated FIN systems operations employee; the request is forwarded to FIN Information Management Branch (IMB); IMB provides access for TACS, and requests access to RMS-CRM, from ESIT Advanced Solutions. When employees leave Maximus, their access is revoked by the same process.

TACS technical security measure are detailed in PIA FIN13029.

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

FIN's security policies are consistent with the BC Government's information security policy.

~~An electronic monitoring process will continually track the use of Gentax (TACS), RMS-CRM, and TDA by SBC/Maximus agents to ensure there is no unauthorized access and use. This is addressed by PIA #####.~~

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.

FIN has provided SBC/Maximus with knowledge base scripts that identify strict procedures and circumstances whereby changes to personal information can be made. An electronic monitoring process will continually track the use of Gentax (TACS), RMS-CRM, ~~TDA~~, and eTax by SBC/Maximus agents to ensure unauthorized changes to personal information are not made.

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

Only agents requiring the use of FIN systems as part of their duties have password-protected access. ~~TACS and RMS Systems~~ have audit logging and access restrictions that will record who accessed the system, at the account level, and when.

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?



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

FIN has provided SBC/Maximus with knowledge base scripts that identify strict procedures for the updating of clients' personal information. Maximus will update contact information in FIN data systems during or immediately after the call. Maximus also enter summary notes about the information provided, action taken, etc into the system. Through FIN systems, this information is accessible by FIN staff.

SVT – residential property owners have the option to amend information they have submitted through eTaxBC by choosing the option to change their previously submitted declaration. They can also contact SBC/Maximus agent to make any update.

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

No. Maximus will use personal information (such as age) to provide guidance as to whether a taxpayer is eligible for a particular program and will provide a response based on that information. However, Maximus will not make a judgment or decision based on the personal information received. FIN remains the decision maker under the FIN programs.

SVT- personal information collected through the declaration process is used to calculate the tax liability or confirm an exemption as per the *Speculation and Vacancy Tax Act*. As above, Maximus will not make these decisions, FIN remains the decision maker. See PIA #FIN18061 for further details.

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.

N/A

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?

N/A

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.
No.

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.
No.



Privacy Impact Assessment for
Ministry of Finance – SBC/Maximus Tier 1
Call Centre
PIA# FIN18049

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

No.



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

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.

Alan Arslan
Privacy Advisor
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Finance

Signature

Date

Holly Romanow
Senior Privacy Advisor
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Finance

Signature

Date



Privacy Impact Assessment for
Ministry of Finance – SBC/Maximus Tier 1
Call Centre
PIA# FIN18049

Part 7 – Program Area Comments and Signatures

Commented [DJF1]: I need to fix the signature page.

Kally Khaira

~~Louise Ford~~

~~Manager, System Operations and Policy~~ Director, Annual Property Tax
Property Taxation Branch
Ministry of Finance

Signature

Date

Richard Barlow

~~Richard Barlow~~

Director of Information Security and Privacy
Corporate and Ministry Support Services
Information Management Branch
Ministry of Finance

Signature

Date

Steven Emery

Executive Director

Property Taxation Branch

Ministry of Finance

Signature

Date

Jordan Goss

Jordan Goss

Assistant Deputy Minister or Designate
Revenue Division
Ministry of Finance

Signature

Date



Privacy Impact Assessment for Ministry of Finance – SBC/Maximus Tier 1 Call Centre PIA# FIN18049

Part 1 – General

Name of Ministry:	Ministry of Finance		
PIA Drafter:	Roger Tailleux, Policy and Legislative Analyst, Property Taxation Branch		
Email:	Roger.Tailleux@gov.bc.ca	Phone:	(778) 698-3878
Program Manager:	Louise Ford, Manager, Systems Operations & Policy, Property Taxation Branch		
Email:	Louise.Ford@gov.bc.ca	Phone:	(778) 698-3962

1. Description of the Initiative

The Ministry of Finance (FIN) administers the following four programs:

Program	Function	Enabling Legislation
Rural Property Tax (RPT)	Levied and collected by PTB in areas of the province outside of municipalities, regional districts and other minor taxing jurisdictions.	<i>Taxation Rural Area Act</i> (TRAA)
Home Owner Grant (HOG)	Grant program to reduce property taxes available to homeowners that pay property taxes to a municipality or to the province if they live in a rural area.	<i>Home Owner Grant Act</i> (HOGA)
Property Tax Deferment (PTD)	Low interest loan available to qualifying homeowners allowing deferment of a portion or all of their residential and farm class property taxes.	<i>Land Tax Deferment Act</i> (LTDA)
Property Transfer Tax (PTT)	Registration tax payable upon the purchase or gain of an interest in property that is registered at the Land Title Office.	<i>Property Transfer Tax Act</i> (PTTA)

FIN receives a very high volume of contact from its clients (rural taxpayers, municipalities, lawyers, notaries and accountants, etc). Contact is made by the following interaction channel types: telephone calls; emails; mail; fax; online applications; and Service BC (SBC) Centres. Contact volumes vary throughout the year - ranging from extremely high during peak tax season to moderate the remainder of the year. A high proportion of the total contact made by clients is by telephone.

As part of an initiative to improve customer service and streamline branch processes, FIN has entered into a service arrangement with SBC for its service provider, Maximus Canada (Maximus), to operate a Tier 1-level call centre for the following three FIN program areas: RPT, HOG, and PTD.



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FIN uses the Computer Talk Technology Inc. (ComputerTalk) Ice Control Centre to channel calls, provide voice messaging and scripting, and to record voice messages received from clients. Incoming calls received by FIN's phone system will be routed to one of two streams, based on the option the caller selects in the phone tree:

- PTT
- All other calls (RPT, HOG, PTD).

PTT calls will continue to be actioned by FIN staff. FIN's phone system will automatically re-route all RPT, HOG and PTD calls to Maximus, who will:

- respond directly to Tier 1-level calls by providing publicly available information as requested, and also personal information, such as account balances;
- add memos to accounts describing the action taken on the client's file (i.e. contact information updates, forms sent out, replacement notices with updated address sent, etc);
- transfer all Tier 2-level calls (i.e. questions that require a judgment/decision or expertise at a level higher than basic level) to the appropriate FIN program area;
- email information to callers, including personal information such as account balances, if requested by taxpayer.

Maximus will use BC Government IDIR accounts and emails will be stored on BC Government systems. Emails will be sent from a government generic email account and will include a 'no reply' message.

By diverting calls for basic questions or for account balances to Maximus, FIN will be able to more effectively and promptly respond to complex and/or more time-consuming questions and information requests. The Tier 1 call centre will thereby enable FIN staff to better focus on their core program administration and processing duties.

As part of their duties, Maximus will need to collect, use and disclose the personal information of FIN clients. They will use the following FIN systems: Gentax (TACS); Revenue Management System (RMS-CRM); Tax Deferment Application (TDA); and the public off-line version of the eTaxBC portal.

As part of the service provided, Maximus will:

- view account data in order to verify a client's identity;
- provide answers to basic questions once the identity of the caller has been verified;
- inform the client where to find information online; and,
- email documents to the address provided by the client, as requested.



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In some cases, they will provide account-specific information to callers, once they have verified the caller's identity and ensured the caller is authorized to receive the information. Questions requiring the use and disclosure of personal information that is beyond the scope of Tier 1 questions, will be transferred to PTB staff.

While the initial roll out of the SBC/Maximus call centre will include the RPT, HOG, and PTD, it is envisioned that other FIN programs will onboard in future phases. The collection, use, disclosure, storage and security of personal information for these additional FIN programs would be consistent with those authorities documented here.

When personal information is involved:

- agents follow a strict caller verification process to ensure the caller is authorized to receive the information requested
- knowledge base scripts identify the verification criteria specific to each of the following:
 - account holder (homeowner)
 - third party (i.e., bank, power of attorney, executor, etc.)
- once/if it is determined that the caller is authorized to receive the information, the agent provides it verbally, or by email, if the citizen requests it.
- if the agent determines the caller is not authorized to receive the information, the agent transfers the call to the appropriate Tier 2 program area.

2. Scope of this PIA

This PIA specifically covers the services provided to FIN by the SBC/Maximus Tier 1 call centre. It includes the limited access to FIN systems (stated above) required by Maximus to collect, use and disclose clients' personal information, which is stored in FIN systems.

3. Related Privacy Impact Assessments

Existing PIAs for FIN Systems and for Previous Tier 1 Call Centre

<u>Software Name</u>	<u>PIA</u>
Gentax (TACS)	FIN13029-TACS V9 Upgrade
Revenue Management System (RMS-CRM)	RMS Overarching PIA FIN15033
Tax Deferment Application (TDA)	Land TDA PIA FIN16016, and PIBS FIN_295
PTB ICE Control Centre	ICEAnywhere Phone System FIN15032



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eTaxBC	FIN13029-TACS V9 Upgrade
HPAS Tier 1 Call Centre for PTB	FIN16034

4. Elements of Information or Data

Maximus will collect, use and disclose those elements of information/data that are required to provide services to clients within the following programs: rural property taxes, home owner grants, and property tax deferment.

This includes the following types of personal information:

- Name
- Age (in some cases)¹
- Address
- Work/home email address
- Work/home phone number
- Financial institution (in some cases)
- Financial information relating to client accounts.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

The information will be stored in BC Government data centres in Canada and will only be accessible within Canada.

¹ There are age requirements for some of our programs, such as: additional home owner grant for seniors; tax deferment available for 55+ years of age.



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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. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.

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;	no
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.	no

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. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

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. The documentation is in progress at this time.	yes



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8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Inbound caller selects on option from the call tree menu. All PTT-related calls are routed to the PTT program area, while all other options route the call to the SBC/Maximus call centre phone system.	No PI	N/A
2.	SBC/Maximus agents answer all non-PTT calls that are routed to them. Agents determine whether the call is at the Tier 1 or Tier 2 level. Agents transfer Tier 2 level calls to the appropriate PTB program area.	Collection; use; disclosure	26(c) 27(1)(b) [33.2(d)], 27(1)(e) 32(a) 33.2(a) 33.2(d)
3.	SBC/Maximus agents respond to Tier 1-level questions/requests that involve publicly-available (non-personal) information, and also personal information.	Collection; use; disclosure	26(c) 27(1)(b) [33.2(d)], 27(1)(e) 32(a) 33.2(a) 33.2(d)
4.	SBC/Maximus agents send requested information (i.e., forms, account balances, etc) to clients by email.	Use; Disclosure	32(a) 33.2(a) 33.2(d)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	SBC/Maximus agents access and use personal information for	Contractual Agreement and/or	Low	High

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	unauthorized purposes.	Workplace Ethics Procedures		
2.	Individual calling for information on an account may not be the holder of that account.	SBC/Maximus agents follow a strict caller verification process prior to disclosing information to ensure the caller is authorized to receive the information requested.	Low	High
3.	SBC/Maximus agents send emails to the wrong recipient(s).	SBC/Maximus agents are instructed to read back the email address to the client before sending, to ensure it is going to the correct recipient(s).	Low	High

10. Collection Notice

PIA# FIN16045 covers the collection notice recording that is played to callers when they initially connect with the PTB phone system.

Part 3 – Security of Personal Information

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

Maximus Canada's security measures are out of scope. PIA# MTICS16066 – Service BC Contact Centre Services speaks to the physical and technical security measures of this service provider.

FIN data is stored at Canadian data centres, which maintain several levels of physical security. The data centre has 24-hour security and access to the building and floors is protected by a door access system.

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

Taxpayer information, including personal information, is stored electronically in FIN systems and will be accessed by SBC/Maximus agents through password-protected computers. System access for Maximus agents is obtained through the following process: an SBC manager forwards the names of the new hires (with IDIR accounts) to the appropriate designated FIN systems operations employee; the request is forwarded to FIN Information Management Branch (IMB); IMB provides access for TACS, and requests access to RMS-CRM, from ESIT Advanced Solutions. When employees leave Maximus, their access is revoked by the same process.

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

FIN's security policies are consistent with the BC Government's information security policy.



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An electronic monitoring process will continually track the use of Gentax (TACS), RMS-CRM, and TDA by SBC/Maximus agents to ensure there is no unauthorized access and use. This is addressed by PIA #####.

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.

FIN has provided SBC/Maximus with knowledge base scripts that identify strict procedures and circumstances whereby changes to personal information can be made. An electronic monitoring process will continually track the use of Gentax (TACS), RMS-CRM, TDA, and eTax by SBC/Maximus agents to ensure unauthorized changes to personal information are not made.

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

Only agents requiring the use of FIN systems as part of their duties have password-protected access. Systems have audit logging and access restrictions that will record who accessed the system, at the account level, and when.

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?

FIN has provided SBC/Maximus with knowledge base scripts that identify strict procedures for the updating of clients' personal information. Maximus will update contact information in FIN data systems during or immediately after the call. Maximus also enter summary notes about the information provided, action taken, etc into the system. Through FIN systems, this information is accessible by FIN staff.

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

No. Maximus will use personal information (such as age) to provide guidance as to whether a taxpayer is eligible for a particular program and will provide a response based on that information. However, Maximus will not make a judgment or decision based on the personal information received. FIN remains the decision maker under the FIN programs.

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.



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N/A

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?

N/A

Part 5 – Further Information

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

No.

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?

No.

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.

Alan Arslan
Privacy Advisor
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Management Office
Ministry of Finance

Signature

Date



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Part 7 – Program Area Comments and Signatures

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Jordan Goss
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