#### Ministry of Indigenous Relations and Reconciliation Litigation Process

#### LAN location:

G:\Executive Office\Deputy Ministers Office\100-499 Administration\352 - Legal Request for Records

#### Process Flow:

STEP	ACTION
Step 1	Official letter notifying of litigation from Ministry of Attorney General is received by MIRR Deputy Minister (DM)  1. Senior Executive Assistant forwards to Manager, Executive Services (MES)  a. MES works with program areas to identify key contacts and drafts response for DM signature  b. MES advises Information Management Coordinator (IMC) of litigation  2. IMC emails the identified key contacts, Central Records (CR), and Correspondence Unit (CU) to request list of applicable documents. CU is responsible for running a report in CLIFF to submit along with key contact and CR findings
Step 2	IMC is the main point of contact for all parties involved going forward
Sept 3	Lists are due from staff to IMC by noon one week prior to date provided by AG
Step 4	IMC compiles all lists from key contacts, CR, and CU into one report.
Sept 5	IMC emails AG contact compiled lists and requests information on when actual records need to be gathered
Step 6	IMC notifies key contacts, CR (& cc Roberta Henry), and CU that they need to submit the required records and complete a Litigation Document Search Form - Part I (Sign-Off)
Step 7	IMC sends documents and completed Litigation Document Search Forms to AG *If sending physical files, boxes are sent as a Legal Custody Transfer

#### **Email Templates**

(1) Initial E-mail

Hi [Key Contacts], Central Records Team, and Correspondence Unit,

As you're aware, IRR has received a request for a list of applicable documents to assist AG in the following litigation:

#### **Litigation Name**

AG's search direction:

\*\*Insert text from email regarding Litigation and what AG would like us search - bold this text \*\*

At this stage AG is requesting <u>list</u> of applicable records that would be responsive to this request in the format of a file list. We are not asking for records at this time. Please ensure your file list contains, at minimum, (1) file name, (2) file type, and (3) a description or associated search term to give some context on the file.

#### Ministry of Indigenous Relations and Reconciliation Litigation Process

Please return this list to me by [DUE DATE] at noon.

If your team has no applicable records, please let me know.

Once received, I will compile all information into one document to submit to AG on behalf of the Ministry.

Central Records is responsible for searching:

- Physical records, in their control, both on site and off site
- Portable databases in their control
- Unclassified records in their control

Correspondence Unit is responsible for searching:

CLIFF

They will not search division LANs or file areas as these items are not in their control.

Please reach out if you have any questions.

Thank you,

[Information Management Coordinator Signature Block]

(2) Response E-mail to AG

Hi [AG paralegal],

Please see the attached file list(s) for your review. Please let me know when you would like us to pull the required records and applicable the due date.

If you have any questions or need anything else, please do not hesitate to get in touch.

Thank you,

[Information Management Coordinator Signature Block]

(3) E-mail to Request Applicable Records

Hi [all staff who responded to file list request regardless of whether they had records or not], Central Records Team, and Correspondence Unit,

It is now time to gather records for the following litigation:

#### Litigation Name

AG has reviewed our file lists and they are requesting specific records as noted on the attached file list.

#### Ministry of Indigenous Relations and Reconciliation Litigation Process

---OR----

AG has reviewed our file lists and they are requesting all records.

Please upload your records to [insert LAN hyperlink] by [due date].

Each team is also required to fill out the attached Litigation Document Search Form - Part I (Sign-Off) regardless of whether you had records or not.

Please reach out if you have any questions.

Thank you,

[Information Management Coordinator Signature Block]

#### Roles and Responsibilities

MIRR	Roles and Responsibilities
Deputy Minister / Senior Executive Assistant	Advise Manager, Executive Services of Litigation
Manager, Executive Services	<ul> <li>Advise Information Management Coordinator (IMC) of Litigation</li> <li>Consult with IMC/staff when necessary</li> <li>Report to Executive on issues arising with Litigation/AG</li> </ul>
Information Management Coordinator	<ul> <li>Primary point of contact for AG/staff</li> <li>Assign/track request</li> <li>Combine file lists</li> <li>Request, coordinate, and compile applicable records</li> <li>Transfer applicable records to AG</li> <li>Track deadlines and report issues to Manager, Executive Services</li> </ul>
Key File Contact(s)	<ul> <li>Coordinate team response and identify lead</li> <li>Approve teams' records and ensure records are applicable</li> <li>Ensure teams manage timelines and upload applicable records to the correct location</li> </ul>

From: Fea, Gabriella IRR:EX(Gabriella.Fea@gov.bc.ca)

Fernyhough, Emily IRR:EX (Emily.Fernyhough@gov.bc.ca) To:

MIRR FOI Process Guide - March 2022 Subject:

11/23/2023 22:13:12 Sent:

Attachments: MIRR FOI Process Guide - March 2022.docx

Ok I think I covered everything for my side....but have a look just in case I missed anything and I'll fix it 😊

#### Ministry of Indigenous Relations and Reconciliation

# Guide to FOI Process

Timelines, Roles, and Responsibilities

**Updated November 2023** 

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#### Introduction

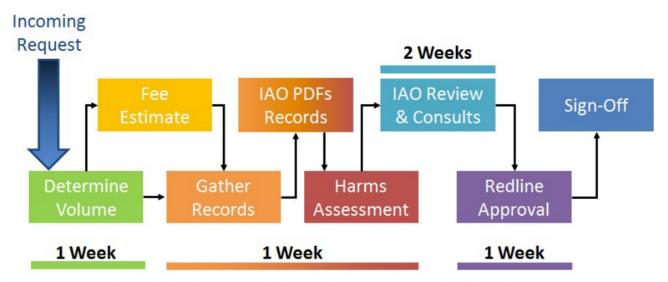
Freedom of Information and Protection of Privacy Act (FOIPPA) Legislation provides the public with the right of access to all government records, with certain exceptions as outlined in the legislation. FOI plays a key role in assuring the accountability, transparency, and legitimacy of the provincial Government and its ministries, employees, and contractors.

#### The purpose of this guide is to provide:

- 1) MIRR FOI process and timelines
- 2) Roles and Responsibilities
- 3) Links and useful FOI information

#### Section 1: The MIRR FOI Process

Our goal is that with good communication and a clear process all FOI requests can be managed to ensure the legislated 30 business day deadline is met.



All documents sent to the FOI Inbox and created by the FOI Team are saved on the LAN: G:\ATN\_Public\_Shr\EXECUTIVE SERVICES

#### 1.1. Standard FOI Process

Step	Action
Step 1	Information Access Operations (IAO) sends request to MIRR via IRR FOI inbox.
Step 2	The Information Management Coordinator (IMC) directs the request to the three division Senior Leadership Teams, the Information Management Team, DMO-SPCI ED, DMO-SPCI Director, DMO-EO ED, DMO-ES Manager, and DMO Submissions Director. If applicable, also include the Correspondence Unit and Minister's Office staff (Chief of Staff, MA(s), and EAA).
	At this time, the request is for staff to provide details around volume and time it will take to collect the records not to provide the actual records.
	Weekly reminders will be sent until those initially canvassed provide a fee estimate or confirm they hold no responsive records.
Step 3	The Senior Leadership Teams work within their teams to determine if there are records held by their team and respond as a team to the MIRR FOI inbox.
	*If NRR (No Responsive Records), IMC sends NRR approval request to Manager,
	Executive Services, and upon approval, submits approved NRR to IAO via Intake Team email.
Step 4	IMC prepares Call for Records form and submits to the IAO via FOI Modernization
	system (FOI MOD). IMC changes the status to "fee estimate" if there is a fee for the
	request, if there is no fee for the request and notes if we suggest a fee (3+ hours of

search time or 200+ pages). Note: if the search time is 3 hours or less, or the page count is 200 or less the FOI team will request records immediately. Step 5 IAO reviews the Call for Records form and determines if a fee is required or if the Ministry should proceed with collecting records. Note: if a fee is indicated, the request goes on hold while the applicant determines if they will pay to receive the records or cancel their request. Once the fee is paid, or if there is no fee, IMC sends the request to gather records to Step 6 teams who identified they have records. If records are going to exceed 1000 pages, a working group will be established by the Manager, Executive Services with the expectation that team members supplying records will participate in working group to ensure records have been given a consistent approach to severing and interpretation of request. Step 7 Teams receive gather request and coordinate responsive records as a team. The teams will provide the FOI Team with their records in the original format via email or the MIRR FOI SharePoint site. The Senior Lead is responsible for ensuring the records submitted are in fact responsive to the request. IMC submits the original records to IAO for deduplication and conversion to a PDF. Step 8 IAO sends a PDF version of the records via the MIRR folder on the IAO File share. IMC sends the records PDF back to the Senior Leadership Teams for harms (if harms are not already supplied). Senior Leadership Teams send the records PDF marked with harms back. If the Correspondence Unit or the Information Management Team produces records, IMC sends to the subject matter expert senior lead(s) to review and apply harms. Note: marked copies of records should be completed using Adobe's highlight and sticky note functions, including a justification on why the harm is being recommended. Do not mark with red boxes or any other format. Step 9 The FOI Analyst reviews marked package to ensure that harms applied are consistent and adds additional harms if necessary. FOI Analyst will also review records to ensure they are responsive to the request. FOI Analyst will return to Senior Lead for re-review if necessary. Step 10 If FOI Analyst deems necessary, Manager, Executive Services reviews the records for: Issues from both a political lens and ministry lens Potential for any consults (3<sup>rd</sup> party and internal) If further EEC member review is required, FOI Analyst emails EEC member indicating issues, concerns, and outline of records/request for review and response. Step 11 FOI Analyst sends harms package to IAO via FOI MOD in the attachments tab. Note: if records were provided to the FOI Team at Step 3, IMC sends the clean version of

records to IAO then.

Step 12	IAO reviews records, coordinates any consults, and redlines the records.
Step 13	IAO sends the redlined records back to the FOI Team via FOI MOD for executive sign off.
Step 14	FOI Analyst reviews the incoming package (including Sign-Off form) and compares the
	ministry's recommendations (marked package) to the redline version from IAO.
	Note: if needed, FOI Analyst will work with staff and IAO to determine why redactions
	were missed/added and determine if the redline package needs to be re-worked.
	FINAL Approval Route
Step 15	FOI Analyst sends redline to the Assistant Deputy Minister, copying their support staff, requesting approval.
Step 16	Once approved, FOI Analyst sends redline to Kimberley Hudson, copying the GCPE
	Manager, for review and recommendations.
Step 17	Once approved, FOI Analyst sends redline to the Deputy Minister, copying their support
	staff, for review and approval.
	Note: DM has full delegated sign off approval from MO.
Step 18	FOI Analyst returns approved package to IAO via FOI MOD. The analyst will then change the status to "response", complete the approver information in the pop up window (approver name, title, date approved) with the following copied into the comment tab "Sign Off Approved by Executive. IAO can proceed with release."
	Note: If coverage is being provided by IMC or Analyst they will need to *watch* the assigned files of the person that they are covering for in MOD. This is to make sure that they will get the notifications the file has moved on to the next stage or a comment has been made in the request that they will need to follow up on.

## 1.2 FOI Process for Routinely Requested MO Records (Monthly calendars, emails, notebooks, texts etc.)

Step	Action
Step 1 Step 2	Information Access Operations (IAO) sends request to MIRR via IRR FOI inbox.  The Information Management Coordinator (IMC) directs the request to the MO.  At this time, the request is for staff to provide details around volume and time it will take to collect the records, not the actual records.
	Weekly reminders will be sent until the MO provides a fee estimate or confirms they hold no responsive records.
Step 3	The MO team works within their office to determine if there are records and responds to the MIRR FOI inbox.
	*If NRR (No Responsive Records), IMC sends NRR approval request to Manager, Executive Services, and upon approval, submits approved NRR to IAO via Intake Team email.
Step 4	IMC prepares Call for Records form and submits to IAO Intake Team via the MIRR folder on the IAO File Share. IMC sends IAO Intake Team an email advising that the form has

been uploaded and notes if we suggest a fee (3+ hours of search time or 200+ pages). Note: if the search time is 3 hours or less, or the page count is 200 or less the FOI team will request records immediately. Step 5 IAO reviews the Call for Records form and determines if a fee is required or if the Ministry should proceed with collecting records. Note: if a fee is indicated, the request goes on hold while the applicant determines if they will pay to receive the records or cancel their request. Step 6 IMC sends the request to gather records to MO. If records are going to exceed 1000 pages, a working group will be established by the Manager, Executive Services with the expectation that subject matter experts will participate in the working group to ensure records have been given a consistent approach to severing and interpretation of request. Step 7 The MO provides the FOI Team with their records in the original format via email or the MIRR FOI SharePoint site. IMC submits the original records to IAO for deduplication and conversion to a PDF. Step 8 IAO sends a PDF version of the records via the MIRR folder on the IAO File share. IMC sends the records PDF to subject matter expert(s) for harms (if harms are not already supplied). Harms reviewer(s) send the records PDF marked with harms back. Note: marked copies of records should be completed using Adobe's highlight and sticky note functions, including a justification on why the harm is being recommended. Do not mark with red boxes or any other format. Step 9 The FOI Analyst will review marked package to ensure that harms applied are consistent and adds additional harms if necessary. Step 10 If FOI Analyst deems necessary, Manager, Executive Services reviews the records for: Issues from both a political lens and ministry lens Potential for any consults (3<sup>rd</sup> party and internal) If further EEC member review is required, FOI Analyst emails EEC member indicating issues, concerns, and outline of records/request for review and response. Step 11 FOI Analyst sends harms package to IAO via the MIRR folder on the IAO file share for redlining. The IAO file share should now contain 2 versions of the records PDFs: Clean copy of records; and Marked copy of records. Note: if records were provided to the FOI Team at Step 3, IMC sends the clean version of records to IAO then. Step 12 IAO reviews records, coordinates any consults, and redlines the records. IAO sends the redlined records back to the FOI Team via the MIRR folder on the IAO file

	share for executive sign off.
Step 13	FOI Analyst reviews the incoming package (including Sign-Off form) and compares the ministry's recommendations (marked package) to the redline version from IAO.  Note: if needed, FOI Analyst will work with staff and IAO to determine why redactions were missed/added and determine if the redline package needs to be re-worked.
	FINAL Approval Route
Step 14	FOI Analyst sends redline to the Manager, Executive Services for review and recommendations.
Step 15	Once approved, FOI Analyst sends redline to Kimberley Hudson, copying the GCPE Manager, for review and recommendations.
Step 16	Once approved, FOI Analyst sends redline to the Executive Director, Executive Operations for review and approval with a note that unless noted otherwise, there will not be further approval of this package.
Step 17	FOI Analyst returns approved package to IAO via the MIRR folder on the IAO file share.

#### 1.3. Proactive Disclosure Procedure for Calendars and Direct Awards

A proactive disclosure is an initiative that enables the release of certain information proactively so that the applicant no longer is required to submit a request through the formal FOI Process.

#### **CALENDARS:**

Under <u>Ministerial Directive 02-2016</u>, monthly calendars are due to the Open Information team no later than 10 calendar days from after the end of the month, with publication not later than 45 calendar days after the end of the month to which they relate.

Step	Action
Step 1	On the first day of every month, the CITZ Open Info sends an email request to MIRR via the IRR FOI inbox for Minister and Deputy Minister Calendars. IMC sends reminder email to SEA and MO AC that calendars are due soon.
Step 2	The SEA is responsible for submitting a PDF version of the DM's calendars via IRR FOI inbox by the first Friday of every month. They must:  • Complete a harms assessment;
	<ul> <li>Obtain DMO Executive Director, Executive Operations approval; and</li> <li>Provide a clean and marked copy of the calendar.</li> </ul>
	Once IMC receives the Minister's calendar from the MO AC, IMC sends it to the SEA for the same process as the DM's calendar.
Step 3	IMC prepares and sends a marked and clean version of the records to CITZ Open Info for redlining by the 10 <sup>th</sup> of each month:
Step 4	CITZ Open Info reviews records and redlines the records.
Step 5	CITZ Open Info returns redlined package to the FOI team.
	FINAL Approval Route
Step 6	IMC sends redline to GCPE Director, copying the GCPE Manager, for review and recommendations.
	If GCPE or CITZ Open Info provides any changes from package Executive Director, Executive Operations reviewed in step 2, IMC sends redline back to Executive Director,

Step 7	Executive Operations for re-review. IMC sends Minister's calendar to MO for approval
	simultaneously.
	Note: MO is final sign off for Minister's calendar.
Step 8	IMC returns approved package to CITZ Open Info.

#### **DIRECT AWARD CONTRACTS – STOB 80**

Under Ministerial Directive 03-2016, monthly direct award summaries are due to the Open Information team no later than 15 calendar days from after the end of the month, with publication not later than 60 calendar days after the end of the month to which they relate.

Step	Action
Step 1	Within the first week of every month, CSNR sends a table of Direct Awards from the previous month or quarter to the IRR FOI inbox.
Step 2	FOI Analyst reviews list and determines which ones require staff review (for e.g. is the information available online and easily accessible). FOI Analyst sends out request on unclear lines to staff for review.
Step 3	Staff review and make recommended changes to Description and Contractor lines within the report, justifying changes for the approval process.
Step 4	FOI Analyst tracks changes and provides to ADMs, GCPE, and Executive Director, Executive Operations for review and approval.
Step 5	Once approved, FOI Analyst sends back to CSNR for changes and submitting to CITZ Open Info.
Step 6	CITZ Open Info prepares final document and sends to the Ministry for approval via the IRR FOI inbox.
Step 7	FOI Analyst reviews to ensure changes were captured. If concerns, changes are required, or if final approval didn't happen occur before being sent to CSNR, FOI Analyst works with staff to review and coordinates approvals.
Step 8	FOI Analyst returns approved document back to CITZ Open Info for posting.

#### 1.4. Consultation and Process

In addition to a normal FOI request, the Ministry is frequently asked to consult with other public bodies on records that they are processing as part of an FOI request. A consultation occurs when a request is made of a public body and that body has records which originated elsewhere. The main difference between a consultation and a MIRR specific request is the timelines are shorter for approval and we are not being asked to supply records. Failure to respond quickly to a consultation may mean that the ministry's advice regarding harm is not included with the severing.

Step	Action
Step 1	FOI Analyst receives request and identifies senior level MIRR staff responsible and sends for their review and harms assessment.
Step 2	MIRR staff works with their subject matter experts, makes any recommendations, and notifies the FOI inbox that harms are applied.
	FINAL Approval Route

Step 3	FOI Analyst sends the consultation harms package to the Assistant Deputy Minister, copying their support staff, requesting approval.
Step 4	Once approved, FOI Analyst sends to Kimberley Hudson, CC Manager, for review and recommendations.
Step 5	Once approved, FOI Analyst sends to the Deputy Minister, copying their support staff, for review and approval.
	Note: DM has delegated authority from MO to approve records.
Step 6	FOI Analyst returns approved package to IAO.

#### Section 2: Roles and Responsibilities

Within MIRR each staff person has accountability when it comes to FOI. Some positions are more accountable and in the below table you will see where and how you fit into the MIRR FOI picture.

MIRR	Roles and Responsibilities
All Staff	<ul> <li>Conduct the search for records and identify length of time to retrieve documents for fee estimates</li> <li>Ensures records provided are in fact responsive to the request</li> <li>Identify harms on own records</li> </ul>
FOI Analyst	<ul> <li>Reviews all packages</li> <li>Forwards final sign-off package through executive for final approval review and signature</li> <li>Tracks deadlines and reports to Manager of Executive Services on potential issues</li> <li>Identifies potential issues from a timing and research perspective</li> <li>Liaises with Manager Executive Services</li> <li>Creates FOI final package email cover sheet</li> <li>Primary point of contact for IAO</li> </ul>
Information Management Coordinator	<ul> <li>Assigns/tracks/combines records/fee estimates to IAO</li> <li>Forwards request to staff for record gathering and harms assessment completion</li> <li>Tracks deadlines and reports to Manager of Executive Services on potential issues</li> <li>Liaises with Manager Executive Services</li> </ul>
Manager Executive Services	<ul> <li>Reviews packages for emerging issues on a required basis</li> <li>Consults with staff when necessary</li> <li>Reports to executive on issues arising with FOI</li> <li>Reviews all consultations</li> <li>Lead FOI Working Groups</li> </ul>

Senior Leadership Team Member	<ul> <li>Coordinates team responses and identifies lead per request</li> <li>Approve team's records and ensuring records are responsive and harms are appropriate</li> <li>Ensure teams manage timelines</li> <li>Flags any issues for the FOI team, EEC Members, and Executive staff</li> </ul>
Expanded Executive Member	<ul> <li>Accountable for reviewing and approving recommended harms from their branch before going to IAO</li> <li>Works with Manager Executive Services on redlines and consultations when required</li> </ul>
GCPE Communication Director/Manager	<ul> <li>Reviews all records packages for possible sensitivities to the Ministry</li> <li>Drafts issues notes as required</li> </ul>
ADM	<ul> <li>Approves all program area specific records packages</li> </ul>
Deputy Minister	- Final sign-off on the records package
Minister's Office	- CCd on DM final sign off package for MO records only

#### **Section 3: FOI Legislation**

#### 3.1 Exceptions under FOIPPA

In terms of limiting the content of disseminated records, the Act provides 11 sections that ensure personal privacy, corporate confidentiality, and discussions regarding policy remain confidential. It is IAO's responsibility to ensue sections of the act is applied appropriately. MIRR staff is responsible for identifying areas of concern within their records and provide a justification as to why they are sensitive. The following sections are intended to limit dissemination of harmful information:

Section	High Level Definition	Things to consider
s. 3 – Scope of this Act	Illustrates records that FIOPPA does not apply to	This section (3(a)) is often applied to court records that are purchasable through Court Services Online
s. 12. – Cabinet and Local Public Body Confidences	Is intended to prevent harm to the government that is presumed to occur if the substance of deliberations is revealed before or too soon after the issues were considered or before the issues are ready for public review. Premature disclosure of Cabinet deliberations inhibits the ability of Cabinet members to debate issues openly and freely, thereby reducing the effectiveness of Cabinet's decision-making role.	Do the records contain information that was submitted or prepared for submission to Cabinet or any Cabinet Committee or Treasury Board? If yes, when (or when did it go) is it scheduled to go before Cabinet or TB? Has it been made public? Is it draft or final submission?  Do the records contain

s.13 – Policy Advice or Recommendati ons	Serves to protect the open and frank discussion of policy issues within the Public Service and may be applied to information that was developed by or for a Ministry or Minister	information that is policy advice prepared for a public body or minister?  Are any of the records created by or for, or in the custody or control of, an officer of the Legislature and that relate to the exercise of that officer's functions under an Act?
s.14 – Legal Advice Section 14	Prevents the disclosure of records that contain communications between a legal advisor and their client. The right to lawyer/client confidentiality may only be waived by the client.	Do any of the records relate to a prosecution that has not been completed?  Do the records contain information that is subject to solicitor client privilege and or used in litigation? If yes, do you recommend consultation with the Ministry of Justice.
s.15 – Disclosure Harmful to Law Enforcement	Prevents the dissemination of records that could reasonably be expected to harm law enforcement. This section is not applicable to routine inspection reports, statistical prosecution information, or reports on the effectiveness of a law enforcement program.	Are any of the records going to jeopardize law enforcement and their integrity?
s.16 – Disclosure Harmful to Intergovernmen tal Relations or Negotiations	Gives the head of the public body the right to refuse to disclose information that could reasonably be expected to harm intergovernmental negotiations.	Do the records contain information that could harm BC's relationship with the Canadian government, another province, municipality, or regional district, an aboriginal government or international state or states? If yes, are the records authored by that other party?
s.17 – Disclosure Harmful to the Financial or Economic Interests of a	Public bodies hold significant amounts of sensitive financial and economic data that are critical to operations, negotiations, and management of the provincial economy. This section ensures such information is not revealed. This section, however, does not	Do the records contain information that could harm the financial or economic interests of the BC government?

Public Body	apply to the results of product or environmental testing carried out by or for the public body unless carried out as a fee for service or for the purpose of developing methods of testing.	
s.18 – Disclosure Harmful to the Conservation of Heritage Sites	Is intended to prevent damage to conservation of fossil sites, natural sites, valuable anthropological or heritage sites, or endangered, rare, threatened, or vulnerable living resources.	Do the records contain information that could harm heritage sites, endangered or vulnerable species or other resources?
s.18.1 - Disclosure harmful to interests of an Indigenous people	Is intended to protect the rights of an Indigenous people to maintain, control, protect, or develop  - Cultural heritage - Traditional knowledge - Traditional cultural expressions - Manifestations of sciences, technologies, or cultures	Do the records contain information that could harm the rights of Indigenous people?  Does not apply if the Indigenous people has consented in writing to the disclosure.
s.19 – Disclosure Harmful to Individual or Public Safety	Gives a public body the discretion to withhold information if its release could threaten another person's safety, mental or physical health, or interfere with public safety. This exception can apply to an individual's own records.	Do the records contain information that could harm a law enforcement matter or the security of a system/property/individu al?
		Do the records contain information that could threaten anyone else's safety or mental or physical health, or interfere with public safety?
s.20 – Information that will be Published or Released within 60 Days	Applies to information that will be publicly available within 60 days of the date of the request or for information which is available for purchase.	Are the records going to be published or released to the public in the next 60 days? If yes, what is the date of publication?
oo Days		Are any of the records available for purchase? If yes, where are these records available?

Are any of the records manuals, instructions or guidelines issued to the officers or employees of the public body, or substantive rules or policy statements adopted by the public body? If yes, where are these records available?

# s.21 – Disclosure Harmful to Business Interests of a Third Party

Ministries conduct business with a variety of contractors and service providers. Release of such information may harm the business interests of those parties.

This section is meant to prevent the release of information that could reveal trade secrets or the commercial, financial, labour relations, scientific or technical information of a third party. This section involves a three-part test (1) reveal trade secrets, or commercial/financial/labour relations/scientific/technical information of or about a third party; (2) supplied implicitly or explicitly in confidence; and (3) disclosure could reasonably be expected to harm the competitive position or interfere with negotiating position of the third party.

Do the records contain information that could harm BC's relationship with the Canadian government, another province, municipality, or regional district, an aboriginal government or international state or states? If yes, are the records authored by that other party?

Do the records contain information that could harm the business interests of a third party? If yes, do you recommend consultation with that third party?

Do the records contain information that if released would be an unreasonable invasion of a third party's personal privacy?

# s.22 – Disclosure Harmful to Personal Privacy

Protects the personal privacy of individuals whose personal information resides with a public body. Section 22 requires the ministry refuse to disclose information that constitutes an unreasonable invasion of a third party's personal privacy.

Do the records contain information that if released would be an unreasonable invasion of a third party's personal privacy?

#### **Introduction to FOI Legislation & Key Points**

The purposes of the Freedom of Information and Protection of Privacy Act (FOIPPA) is to make public

bodies more accountable to the public and to protect personal privacy by:

- giving the public a right of access to records;
- giving individuals a right of access to, and a right to request correction of personal information about themselves;
- specifying limited exceptions to the rights of access;
- preventing the unauthorized collection, use or disclosure of personal information by public bodies; and
- providing for an independent review of decisions made under this Act.

FOI legislation mandates that records be released within 30 business days of an FOI request being received. While extensions can be made, (based on volume of records, consultations etc.) the bulk of requests are processed within the 30-day timeframe. The 30-day countdown begins as soon as a request is made to a ministry. If a request is made at 11:59 pm on June 4<sup>th</sup> then June 4<sup>th</sup> is considered day 1 of 30. A request is submitted to the ministry via IAO to the FOI Team at IRRFOI@gov.bc.ca.

It is important for ministry employees to be cognizant of this mandated timeframe. The clock starts the moment a request is received – whether it was received by the ministry and redirected to IAO for processing or whether it was received by the FOI Office.

#### 3.3. FOI related links and Glossary

- 1. MIRR FOI SharePoint: https://spc-MIRR.gov.bc.ca/MIRRfoi/default.aspx
- 2. MIRR FOI Team Email: IRRFOI@gov.bc.ca
- 3. Information Access Operations homepage: <a href="http://www.gov.bc.ca/citz/iao/">http://www.gov.bc.ca/citz/iao/</a>
- A copy of the FOI Act: http://www.bclaws.ca/EPLibraries/bclaws\_new/document/ID/freeside/96165\_00
- 5. FOIPPA Policy and Procedures Manual: http://www.cio.gov.bc.ca/cio/priv\_leg/manual/index.page
- 6. IAO Records Management: http://www.gov.bc.ca/citz/iao/records\_mgmt/index.html
- 7. Open Information: <a href="http://www.openinfo.gov.bc.ca/ibc/index.page">http://www.openinfo.gov.bc.ca/ibc/index.page</a>?
- 8. Office of the Information & Privacy Commissioner: <a href="http://www.oipc.bc.ca/">http://www.oipc.bc.ca/</a>

Term	Definition
Applicant	Any person, business, or entity that submits an FOI request. The identity of the applicant is protected by FOIPPA legislation and cannot be released to the ministry.
Call for Records (CFR)	The initial notification to the Ministry that an FOI request has been made. The Call for Records includes the request, due dates, and other pertinent information.
Consultation	The process by which a Ministry seeks advice on records in its holdings that originated with another public body.
Custody or Control	Custody or Control refers to the legal ownership of records.
Fee Estimate	An estimate of the cost of the FOI request that is borne by the applicant.
Harms	The mechanism by which any potentially sensitive record that may negatively impact the Ministry can be brought to the attention of IAO.

Head of Public Body  In relation to a public body means, (1) if the public body is a ministry office of the government of British Columbia, the member of the Executive Council who presides over it, (2) if the public body is	or
designated in, or added by regulation to, Schedule 2, the person designated as the head of that public body in that Schedule or by regulation, and (3) in any other case, the person or group of persons designated under section 77 as the head of the public body.	
Local Public Body  Means a local government body, a health care body, a social services body, an educational body, or governing body of a professional occupation if the governing body is designated in Schedule 3.	
Means a (1) municipality, (2) regional district, (3) an improvement district as defined in the Local Government Act, (4) a local area as defined in the Local Services Act, (5) a greater board as defined in the Community Charter or any incorporated board that provides similar services and is incorporated by letters of patent, (6) a board of varian established under section 899 of the Local Government Act or section 572 of the Vancouver Charter, (7) the trust council, the executive committee, a local trust committee and the trust fund board as defin by Islands Trust Act, (8) the Okanagan Water Basin Board, (9) a water users' committee as defined by the Water Act, (10) the Okanagan-Kootenay Sterile Insect Release Board, (11) municipal police board established under section 23 of the Police Act, (12) a library board as defined in the Library Act, (13) any board, committee, commission, panel, agency or corporation that is created or owned by a body referred to in sections (1) to (12) and all the members or officers of which are appointed or chosen by under the authority of that body, (14) a board of trustees established under section 37 of the Cremation, Interment and Funeral Services Action (15) the South Coast British Columbia Transportation Authority, and (16) the Park Board referred to in section 485 of the Vancouver Chart	ed or et,
On-Hold  Refers to stopping the countdown of legislated days before the recor are due to the applicant.	ds
<b>Personal Information</b> Means recorded information about an identifiable individual other the contact information.	an
Public Body  Means either a ministry of the government of British Columbia, an agency, board, commission, corporation, office or other designated ir or added by regulation to Schedule 2, or a local public body. Not applicable, however, is the office of a person who is a member or office of the legislative assembly, or the Court of Appeal, Supreme Court, or Provincial Court.	cer
Record  Includes books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is record or stored by graphic, electronic, mechanical or other means, but does not include a computer program or other mechanism that produces records.	
Schedule 2 Is <u>a list</u> of institutions and/or entities that are subject to FOIPPA legislation?	
	ons

	subject to FOIPPA legislation?
Service Provider	Means a person retained under a contract to perform services for a public body. A service provider's records are subject to FOI.
Sign-Off	Is the process by which the ministry approves the release of records to the applicant?
Third Party	In relation to a request for access to a record or for correction of personal information, means any person, group, or organization other than the person who made the request or a public body.
Transitory	Transitory records are records of temporary usefulness that are not an integral part of an administrative or operational record series, that are not regularly filed with standard records or filing systems, and that are only required for a limited period of time for the completion of a routine action or the preparation of an ongoing record.  Transitory records are not required to meet statutory obligations or to sustain administrative or operational functions. Originals or copies required for statutory, legal, fiscal, administrative or operational purposes will be retained in a regular filing system and disposed of separately in accord with the Document Disposal Act. This schedule covers the following types of transitory records.

To: IRR FOI IRR:EX (IRRFOI@gov.bc.ca)

Subject: FW: Sign Off Process - Please Review and Advise

**Sent:** 09/26/2023 23:30:23

Can one of you please update the FOI manual to reflect this?

#### Kim Ponchet

she/her | hear my name Manager, Executive Services | Deputy Minister's Office Ministry of Indigenous Relations & Reconciliation 250 812-2459

I acknowledge with gratitude that I am privileged to live, work, and play on many unceded territories, particularly the lands of the  $lak^w > 0$  and  $lak^w > 0$  and  $lak^w > 0$  and  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  are the  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$  and  $lak^w > 0$  are the  $lak^w > 0$ 

From: IRR FOI IRR:EX < IRRFOI@gov.bc.ca>

**Sent:** Wednesday, September 13, 2023 11:31 AM **To:** Boyd, Melissa CITZ:EX <Melissa.Boyd@gov.bc.ca>

Cc: Heinrich, Tara CITZ:EX <Tara.Heinrich@gov.bc.ca>; Hughes, Merissa CITZ:EX <Merissa.Hughes@gov.bc.ca>;

Champion, Meaghan CITZ:EX < Meaghan.Champion@gov.bc.ca>; Fea, Gabriella IRR:EX

<Gabriella.Fea@gov.bc.ca>; Ponchet, Kim IRR:EX <Kim.Ponchet@gov.bc.ca>

Subject: RE: Sign Off Process - Please Review and Advise

Hi Melissa,

Looks good to us – we will use the proposed standard wording going forward.

Thanks,

#### **Emily**

FOI Team

Deputy Minister's Office

Ministry of Indigenous Relations & Reconciliation

I acknowledge with gratitude that I am privileged to live, work, and play on many unceded territories, particularly the lands of the  $lak^w$ -and and a

From: Boyd, Melissa CITZ:EX < Melissa.Boyd@gov.bc.ca >

Sent: Wednesday, September 13, 2023 11:28 AM

To: IRR FOI IRR:EX < IRRFOI@gov.bc.ca>

**Cc:** Heinrich, Tara CITZ:EX < <a href="mailto:Tara.Heinrich@gov.bc.ca">Tara.Heinrich@gov.bc.ca</a>; Hughes, Merissa CITZ:EX < <a href="mailto:Merissa.Hughes@gov.bc.ca">Merissa.Hughes@gov.bc.ca</a>;

Champion, Meaghan CITZ:EX < Meaghan.Champion@gov.bc.ca >

Subject: Sign Off Process - Please Review and Advise

Good morning,

With the new FOI Modernization system (FOI Mod) being rolled out and FOI processes evolving, IAO wants to confirm a sign off process with the Ministry going forward. Previously, I believe IRR was using an email approval to indicate that a file was approved by executive for release. With FOI Mod, this approval has been indicated as a comment with the state of the request being changed to 'Response'. In some occurrences a signed approval form has also been added to the attachments tab.

IAO wants to ensure a consistent approach going forward so we can confidently proceed with release of FOI requests. We are proposing the follow standard wording is added as a comment of a request to confirm approval:

Sign Off Approved by Executive. IAO can proceed with release.

A signed approval form can also be loaded but IAO will accept approval if this wording in a comment is used and the state of the request has been updated to 'Response'. Please review and confirm at your earliest convenience that this updated process works for your Ministry. If you have any questions or concerns, please let us know.

Thank you,

**Melissa Boyd** | Team Lead | Community and Health Team | Information Access Operations | Ministry of Citizens' Services

**Ph:** 778 698-2867 | **e:** Melissa.Boyd@gov.bc.ca | **m:** PO Box 9569, Stn Prov Gov, Victoria BC V8W 9K1

**To:** IRR Deputy Minister's Office (ABRDMOFF@Victorial.gov.bc.ca)

**To:** IRR Information Management IRR:EX (IRRInformationManagement@gov.bc.ca)

**Subject:** \*NEW\* IRR Records Destruction Process

**Sent:** 08/17/2023 00:49:54

Attachments: RECORDS DESTRUCTION AUTHORIZATION PROCESS.docx

Hi all,

Do you know what your responsibility as a public servant entails when it comes to deleting or destroying records?

Did you inherit a space with paper files crammed in the drawers, or were you tasked with cleaning out a long-forgotten file cabinet?

Have you been told you're not allowed to delete or destroy records, but you feel they're past their useful stage?

Does your LAN make your head spin with never ending folders, duplicates, and multiple versions of records?

Are you thinking, "Yes, but also... what's a record?" As per the *Interpretation Act*, a record includes books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is recorded or stored by any means whether graphic, electronic, mechanical, or otherwise.

MIRR has simplified our records destruction process – see attached. This means, if you have records that have reached their government shelf-life, or you're unsure if they have or not, there is a one-stop process to follow to request information, and, if appropriate, their destruction.

Please reach out to me or the <u>Information Management Branch</u> for more information.

#### **Kim Ponchet**

she/her | hear my name Manager, Executive Services | Deputy Minister's Office Ministry of Indigenous Relations & Reconciliation 250 812-2459

I acknowledge with gratitude that I am privileged to live, work, and play on many unceded territories, particularly the lands of the  $lak^{\prime\prime}$ 

Parry, Carly PSSG:EX (Carly.Parry@gov.bc.ca); Munro, Asia IRR:EX

(Asia.Munro@gov.bc.ca); Waters, Leah IRR:EX (Leah.Waters@gov.bc.ca)

**Subject:** Please circulate to your divisions

**Sent:** 08/17/2023 00:56:39

Attachments: \*NEW\* IRR Records Destruction Process.msg

Hi all,

Please discuss with your ADM, and determine whether you or they send the attached email to your division. I have circulated to the DMO.

Thanks!

#### **Kim Ponchet**

she/her | hear my name Manager, Executive Services | Deputy Minister's Office Ministry of Indigenous Relations & Reconciliation 250 812-2459

I acknowledge with gratitude that I am privileged to live, work, and play on many unceded territories, particularly the lands of the  $lak^w$ -aŋan and  $\underline{W}$ SÁNEĆ peoples.

IRR Correspondence Unit IRR:EX (IRRCorrespondenceUnit@gov.bc.ca); IRR Information

To: Management IRR:EX (IRRInformationManagement@gov.bc.ca); IRR FOI IRR:EX

(IRRFOI@gov.bc.ca)

Peters, Stephanie X IRR:EX (Stephanie.X.Peters@gov.bc.ca); Henry, Roberta IRR:EX

**To:** (Roberta.Henry@gov.bc.ca); French, Shawna IRR:EX (Shawna.French@gov.bc.ca);

Fernyhough, Emily IRR:EX (Emily.Fernyhough@gov.bc.ca)

Subject: Process change - CLIFF & FOI & Litigation searches

**Sent:** 07/29/2023 00:33:19

Hi all,

Effective Aug 1, 2023, the Information Management Branch/Central Records Team will be responsible for searching CLIFF for all FOI and litigation searches. The CU will no longer be responsible for this task. Can you all please update any relevant manuals/process documents to reflect this change.

This <u>does not</u> change the BN report that Rowan is responsible for.

If you have any questions, please reach out to me.

Thank you!

#### Kim Ponchet

she/her | hear my name Manager, Executive Services | Deputy Minister's Office Ministry of Indigenous Relations & Reconciliation 250 812-2459

I acknowledge with gratitude that I am privileged to live, work, and play on many unceded territories, particularly the lands of the  $lak^w \ni \eta \ni n$  and WSANEC peoples.

To: Kennedy, Kimberly IRR:EX (Kimberly.Kennedy@gov.bc.ca); Fea, Gabriella IRR:EX

(Gabriella.Fea@gov.bc.ca)

**To:** French, Shawna IRR:EX (Shawna.French@gov.bc.ca)

Subject: RE: MO FOI process change

**Sent:** 03/05/2021 17:45:34

Hi again,

To elaborate on the new part of the weekly FOI Report, please:

- Please add a second table with all current FOI requests/proactive disclosures that MO has not provided
  approval direction on (the first report will be large to incorporate all current requests, but future tables
  should, in theory, be smaller and only include requests that came in over the week before
  - This table will have two columns: (1) Request and (2) MO Approving (Yes/No)
- I will go over this table with the MO during my weekly check in call
- Once I have direction on whether they wish to approve an FOI request or not, I will advise the FOI Inbox
- Gabby, please populate the new column on the FOI SharePoint with this direction
- Gabby and Kim, please ensure you're checking this column when doing final approvals for FOI requests

#### Example:

Request	MO Approving (Yes/No)
A summary document showing the cliff number, date and	DMO suggested answer: No
title/issue of all briefing notes, issues note and advice to	MO direction:
the Deputy Minister and the Minister/Minister of	
State/Premier (Date Range for Record Search: From	
1/1/2021 To 1/31/2021)	
Description: Copy of any documents, including interim or	DMO suggested answer: Yes
final reporting and internal government communications,	MO direction:
regarding agreement #TP17LNG155 between then-	
Minister of Aboriginal Relations and Reconciliation and the	
Wet'suwet'en Matrilineal Coalition, titled 'Practicing Unity	
in Oral Traditions and Decisions Regarding Lands and	
Resource' and signed Feb. 3, 2017. In particular, please	
provide information about the deliverable to 'establish	
website for ease of information sharing,' including website	
URL, content and any contractors hired to establish the	
site. If any subsequent contracts have been signed between	
the Province of B.C. and the Wet'suwet'en Matrilineal	
Coalition, please include those documents in any search	
results (Date Range for Record Search: From 5/15/2017 To	
1/31/2021) Description: Copy of any documents, including	
interim or final reporting and internal government	
communications, regarding agreement #TP17LNG155	
between then-Minister of Aboriginal Relations and	
Reconciliation and the Wet'suwet'en Matrilineal Coalition,	
titled 'Practicing Unity in Oral Traditions and Decisions	
Regarding Lands and Resource' and signed Feb. 3, 2017. In	
particular, please provide information about the	
deliverable to 'establish website for ease of information	
sharing,' including website URL, content and any	
contractors hired to establish the site. If any subsequent	
contracts have been signed between the Province of B.C.	
and the Wet'suwet'en Matrilineal Coalition, please include	
those documents in any search results (Date Range for	
Record Search: From 5/15/2017 To 1/31/2021)	
,	

#### Kim Ponchet

(she/her)
Manager, Executive Services
Deputy Minister's Office
Ministry of Indigenous Relations & Reconciliation
250 812-2459

From: Ponchet, Kim IRR:EX Sent: March 3, 2021 12:06 PM

To: Kennedy, Kimberly IRR:EX < Kimberly. Kennedy@gov.bc.ca>; Fea, Gabriella IRR:EX

<Gabriella.Fea@gov.bc.ca>

Cc: French, Shawna IRR:EX <Shawna.French@gov.bc.ca>

Subject: MO FOI process change

Hi FOI Team,

The MO would like to be more involved in the FOI approval process. They are aware of the importance of deadlines.

This change does **not** apply to consults. Doug will continue to be the last stop of approvals for consults. (Shawna – I checked with Leslie on this as we didn't cover it in our call and this is <sub>+</sub>MO direction)

MO would like to <u>always</u> be final approver on the following items. I will rely upon you two to use your judgement (happy to talk it through if you have any questions!) of LDD timing as to whether they are sent after DM review or simultaneously. Please ensure this is indicated when you send them the redline.

- MO emails
- MO calendars
- MO documents
- Current / hot topics
- High profile proactive disclosures (transition, estimates binders NOT DM calendars)

For the weekly FOI report, please add a second table with all current FOI requests and whether MO will be approving. Please see below for an example.

Request	MO Approving (Yes/No)
A summary document showing the cliff number, date and	DMO suggested answer: No
title/issue of all briefing notes, issues note and advice to	MO direction:
the Deputy Minister and the Minister/Minister of	
State/Premier (Date Range for Record Search: From	
1/1/2021 To 1/31/2021)	
Description: Copy of any documents, including interim or	DMO suggested answer: Yes
final reporting and internal government communications,	MO direction:
regarding agreement #TP17LNG155 between then-	
Minister of Aboriginal Relations and Reconciliation and the	
Wet'suwet'en Matrilineal Coalition, titled 'Practicing Unity	
in Oral Traditions and Decisions Regarding Lands and	
Resource' and signed Feb. 3, 2017. In particular, please	
provide information about the deliverable to 'establish	
website for ease of information sharing,' including website	
URL, content and any contractors hired to establish the	
site. If any subsequent contracts have been signed between	
the Province of B.C. and the Wet'suwet'en Matrilineal	
Coalition, please include those documents in any search	
results (Date Range for Record Search: From 5/15/2017 To	

1/31/2021) Description: Copy of any documents, including interim or final reporting and internal government communications, regarding agreement #TP17LNG155 between then-Minister of Aboriginal Relations and Reconciliation and the Wet'suwet'en Matrilineal Coalition, titled 'Practicing Unity in Oral Traditions and Decisions Regarding Lands and Resource' and signed Feb. 3, 2017. In particular, please provide information about the deliverable to 'establish website for ease of information sharing,' including website URL, content and any contractors hired to establish the site. If any subsequent contracts have been signed between the Province of B.C. and the Wet'suwet'en Matrilineal Coalition, please include those documents in any search results (Date Range for Record Search: From 5/15/2017 To 1/31/2021)

Please add another column to the tracker on the SharePoint indicating a Yes or No option for if MO is approving.

**Gabby**, can you please update the FOI Manual to reflect these changes using track changes and send to me for review.

Please let me know if you have any questions!

Thank you,

#### Kim Ponchet

(she/her)
Manager, Executive Services
Deputy Minister's Office
Ministry of Indigenous Relations & Reconciliation
250 812-2459

Bank-Jaffe, Max IRR:EX (Max.Bank-Jaffe@gov.bc.ca); Bergevin, Niomi EMLI:EX (Niomi.Bergevin@gov.bc.ca); Hynds, Rowan IRR:EX (Rowan.Hynds@gov.bc.ca); Johnson, Sheila V IRR:EX (Sheila.V.Johnson@gov.bc.ca); Laycock, Christine EMLI:EX (Christine.Laycock@gov.bc.ca); Logue, Kelley IRR:EX (Kelley.Logue@gov.bc.ca); McDonald, Alana G IRR:EX (Alana.McDonald@gov.bc.ca); McIntyre, Trenton DAS:EX (Trenton.McIntyre@gov.bc.ca); Norman, Katie IRR:EX

(Katie.Norman@gov.bc.ca); Semenko, Michelle IRR:EX (Michelle.Semenko@gov.bc.ca); West, Kiera IRR:EX (Kiera.West@gov.bc.ca); Howie, Matthew IRR:EX (Matthew.Howie@gov.bc.ca); Baxter, Breanne IRR:EX (Breanne.Baxter@gov.bc.ca); Hold - 230529 - Clark, Alicia IRR:EX (Alicia.Clark@gov.bc.ca); Queen, Stephanie IRR:EX (Stephanie.Queen@gov.bc.ca)

IRR FOI IRR:EX (IRRFOI@gov.bc.ca); IRR Correspondence Unit IRR:EX (IRRCorrespondenceUnit@gov.bc.ca); French,
Shawna IRR:EX (Shawna.French@gov.bc.ca); Vanduyvenvoorde, Emma IRR:EX (Emma.Vanduyvenvoorde@gov.bc.ca);
Waters, Leah IRR:EX (Leah.Waters@gov.bc.ca); Gilmour, Lori TACS:EX (Lori.Gilmour@gov.bc.ca)

Subject: Tips for CLIFFing Briefing Notes / Bullets / Correspondence

Sent: 04/14/2023 21:37:16

Hi everyone,

#### Please forward this to anyone else who should be aware.

Under section 71.1 (1) of the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. 165 (FOIPPA), we are required to submit a monthly summary of briefing notes (and bullets) provided to Minister which are published on the <a href="Open Information">Open Information</a> website according to the schedule as defined within the <a href="Ministerial Directive">Ministerial Directive</a>.

To provide this summary, the FOI Team and subject matter staff conduct a harms assessment of the records to identify any content that could be harmful to the ministry if released to the public. Through this process, we are seeing an increase in unnecessary detail within CLIFF subject lines. Please keep CLIFF subject lines as short as possible. Details like dollar amounts for funding and dates are unnecessary and are subject to change, so their inclusion can cause inaccurate records. Words like "regarding" are unnecessary as that's what the subject field is pertaining to. I have gone through some of February's subjects and provided feedback below. Please take the time to review this and put these tips into practice when creating new CLIFF logs.

This advice can also be applied to correspondence.

Subject or Title of Briefing Note		
Existing CLIFF Subject	Suggested Alternative	

s. 16

February FCRSA batch: Witset First Nation, Snaw-Naw-As First Nation,	None - this is good
Malahat Nation, Xatsull First Nation, Hesquiaht First Nation, Haisla	
Nation, Lil'wat Nation	
Chief Roberts MMR Response - 27-02-23	Should be a short topic description of the letter - the other fields within
	CLIFF note who the letter is going to, who signed it, and when it was
	dated.
Regarding economic reconciliation, and equitable funding for	Economic reconciliation, and equitable funding for Indigenous British
Indigenous British Columbians and communities.	Columbians and communities.
MMR Briefing re: Treaty Amendments	None - this is good
Child and Family Services Protocol with Modern Treaty Nations and	None - this is good
Canada	
s. 16 Incremental Treaty and Reconciliation	None - this is good
Agreement	
Sts'ailes G2G Forum	None - this is good
s. 16	None - this is good
s. 16 :XEL SQ'EQ'Ó Agreement.	
Draft letter regarding Métis government and s35 rights from Province to	Métis government and s35 rights
MNBC	
Provincial Agricultural Land Reserve designation in S. 16	None - this is good
s. 16	
Policy to address Provincial Agricultural Land Reserve (ALR) designation	None - this is good
on First Nation Treaty and other self-governance Lands	
s. 16 LOU signing	None - this is good

Meeting with Haisla None - this is good

Please reach out if you have any questions.

#### Kim Ponchet

(she/her)
Manager, Executive Services
Deputy Minister's Office
Ministry of Indigenous Relations & Reconciliation
250 812-2459

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### DELEGATION OF THE DUTIES, POWERS AND FUNCTIONS OF A MINISTER AS HEAD OF A PUBLIC BODY UNDER THE FREEDOM OF INFORMATION AND PROTECTION OF PROTECTION ACT

#### **Ministry of Indigenous Relations and Reconciliation**

#### Instructions:

Under the Freedom of Information and Protection of Protection Act, the "head" of a public body (in the case of a ministry, a minister) is assigned a number of duties, powers and functions. FOIPPA permits the head to delegate any of these duties, powers or functions to any person. It stipulates that this delegation must be in writing and may contain any conditions or restrictions the head of the public body considers appropriate.

This template is provided for use by ministers in making these delegations. A minister may modify the template as appropriate to set additional conditions or restrictions on any duty, power or function.

Where a person is delegated in Column 2 of the table below, that delegation does not limit the authority of individuals in positions directly above the listed positions to exercise any of the delegated powers, duties, or functions in their area of responsibility. Notwithstanding the delegations, the minister may exercise at any time any of the powers, duties, or functions conferred on them under FOIPPA.

A minister may delegate a duty, power or function to **any person**; Column 3 of the table below provides guidance on the position title to which ministries have historically delegated each duty, power or function.

Ministries may contact the Privacy Helpline at 250 356-1851 or <a href="mailto:Privacy.Helpline@gov.bc.ca">Privacy.Helpline@gov.bc.ca</a> if they have any questions about how to use this template.

DUTY, POWER OR FUNCTION OF THE MINISTER	POSITION TITLE & IF APPLICABLE, NAME OF PUBLIC BODY OR ORGANIZATION	SUGGESTED LEVEL OF DELEGATION			
FREEDOM OF INFORMATION (FOI)	FREEDOM OF INFORMATION (FOI)				
Section 6 – Duty to assist applicants  The head of a public body must make every reasonable effort to assist FOI applicants and to respond openly, accurately, and without delay. The head also must create a record in limited, specified circumstances.  Note: While fulfilling this duty is the responsibility of all employees, this person is accountable.	Assistant Deputy Minister	Assistant Deputy Minister			
Section 7 – Time limit for responding  The head of a public body must respond to an FOI applicant within 30 business days of receiving a request unless;  a) A valid extension is taken (see s. 10);  b) The request is transferred to another public body (see s. 11);  c) The head has requested the Commissioner authorize the public body to disregard a request that is frivolous or vexatious (see s. 43);  d) The applicant has been issued a fee estimate; or  e) The Commissioner has been requested to review any of the matters set out in 7(5) and (6)  Note: While all persons involved in responding to a request must exercise diligence in this regard, this person is accountable.	Assistant Deputy Minister	Assistant Deputy Minister			
Section 8 – Contents of response  The head of a public body must inform the applicant whether they are entitled to access a record, and provide details about how access will be given. If access is refused, the head of the public body must inform the applicant why, and provide contact information of an officer or employee of the public body who can answer the applicant's questions about the refusal. The head of a public body may refuse to confirm or deny the existence of a record if specified conditions are met (see s. 8(2)).  Note: Information Access Operations staff will issue the response to the applicant that meets the legislated obligations. However, this person is accountable for making the decision to provide or refuse access, or to refuse to confirm or deny the existence of a record.	*except for No Records Response – Manager, Executive Services  *except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister			

DUTY, POWER OR FUNCTION OF THE MINISTER	POSITION TITLE & IF APPLICABLE, NAME OF PUBLIC BODY OR ORGANIZATION	SUGGESTED LEVEL OF DELEGATION
Section 9 – How access will be given  If access will be given, the head of a public body must comply with the following:  a) If the record can be reasonably reproduced, either electronically or in hard copy, then it must be provided in the form requested by the applicant.  b) Where the above is not possible, the applicant can also be permitted to examine the record.	FOI Analyst, Corporate Information and Records Management Office (CIRMO)	FOI Analyst, Corporate Information and Records Management Office (CIRMO)
Section 10 – Extending the time limit for responding  The head of a public body may extend the timeline for responding to a request if specified criteria are met. If an extension has been taken, the applicant must be provided the reason and when the response can be expected.	Decision to take an extension: FOI Analyst, CIRMO	Decision to take an extension: FOI Analyst, CIRMO
	Requirement to inform applicant: FOI Analyst, CIRMO	Requirement to inform applicant: FOI Analyst, CIRMO
Section 11 – Transferring a request  If the record was produced, obtained, or is under the control or custody of another public body, then the request can be transferred within the first 20 days. The head of the other public body must respond to the applicant no later than 30 days after the transferred request is received, unless the time limited is extended under section 10.	Decision to transfer: FOI Analyst, CIRMO	Decision to transfer: FOI Analyst, CIRMO
	Requirement to notify applicant: FOI Analyst, CIRMO	Requirement to notify applicant: FOI Analyst, CIRMO
Section 43 – Power to authorize a public body to disregard requests  The head of a public body may ask the Commissioner for authorization to disregard requests that are frivolous or vexatious or would unreasonably interfere with operations of the public body due to their repetitious or systematic nature.	Deputy Minister	Deputy Minister
FOI FEES		
Section 75(1) – Fees for services  The head of a public body may require payment of fees for locating, retrieving, producing, preparing, shipping and handling, and/or providing a copy of the record.	FOI Analyst, CIRMO	FOI Analyst, CIRMO
Section 75 (4) – Fee estimate  If an applicant is required to pay a fee for services, the head of the public body must provide a written fee estimate and may set amount of deposit required.	FOI Analyst, CIRMO	FOI Analyst, CIRMO
Section 75 (5) – Fee waiver  If the head of a public body receives an applicant's written request to be excused from paying all or part of the fees for services, the head may excuse all or part of the fee.	Assistant Deputy Minister	Assistant Deputy Minister
Section 75 (5.1) – Fee waiver response The head of a public body must respond in writing to applicant's fee waiver request within 20 days.	FOI Analyst, CIRMO	FOI Analyst, CIRMO

DUTY, POWER OR FUNCTION OF THE MINISTER	POSITION TITLE & IF APPLICABLE, NAME OF PUBLIC BODY OR ORGANIZATION	SUGGESTED LEVEL OF DELEGATION
EXCEPTIONS TO DISCLOSURE UNDER FOI		
Section 12(1) – Cabinet confidences  The head of a public body must refuse to disclose the substance of deliberations of the Executive council or any of its committees. This includes any advice, recommendations, policy considerations, draft legislation or regulations submitted or prepared for submission.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 13 – Policy advice or recommendations  The head of a public body may refuse to disclose information that would reveal advice or recommendations developed by or for a public body or a minister.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 14 – Legal advice  The head of a public body may refuse to disclose information subject to solicitor client privilege.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 15 – Disclosure harmful to law enforcement  The head of a public body may refuse to disclose information which could reasonably be expected to harm law enforcement.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 16 – Disclosure harmful to intergovernmental relations or negotiations  The head of a public body may refuse to disclose information that could reasonably be expected to harm relations between the government of B.C. and other governments or their agencies.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Sections 17 – Disclosure harmful to the financial or economic interests of a public body  The head of a public body may refuse to disclose information that could reasonably be expected to harm the financial or economic interests of a public body or the government of B.C.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 18 – Disclosure harmful to the conservation of heritage sites, etc.  The head of a public body may refuse to disclose information that could reasonably be expected to damage or interfere with the conservation of fossil sites, heritage sites, or endangered species.	Assistant Deputy Minister*	Assistant Deputy Minister

DUTY, POWER OR FUNCTION OF THE MINISTER	POSITION TITLE & IF APPLICABLE, NAME OF PUBLIC BODY OR ORGANIZATION	SUGGESTED LEVEL OF DELEGATION
	*except for DM Calendar – Executive Director, Executive Operations	
Section 19 – Disclosure harmful to individuals or public safety  The head of a public body may refuse to disclose information which could reasonably be expected to threaten anyone else's safety, mental or physical health; interfere with public safety; or cause the applicant immediate and grave harm.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 20 – Information that will be published or released in 60 days  The head of a public body may refuse to disclose information that will be published or released to the public within 60 days of the receipt of the applicant's request, or that must be published or released to the public under an enactment.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 21 – Disclosure harmful to business interests of a third party The head of a public body must refuse to disclose trade secrets, commercial, financial, labour relations or scientific information of or about a third party; that was supplied in confidence; and disclosure of which could reasonably be expected to cause specified harm.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 22 – Disclosure harmful to personal privacy  The head of a public body must refuse to disclose information that would be an unreasonable invasion of a third party's personal privacy.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
Section 22.1 (2) – Disclosure of information relating to abortion services  The head of a public body must refuse to disclose information that relates to the provision of abortion services.	*except for DM Calendar – Executive Director, Executive Operations	Assistant Deputy Minister
THIRD-PARTY NOTICE UNDER FOI		
Section 23 – Notifying the third party  The head of a public body must give a third party written notice when it intends to give access to a record containing information that it has reason to believe might be excepted from disclosure under s. 21 or 22 and may give a third-party notice when it intends to refuse access to information pursuant to s. 21 or s. 22.	FOI Analyst, CIRMO	FOI Analyst, CIRMO
Section 24 – Time limit and notice of decision	Assistant Deputy Minister	Assistant Deputy Minister

DUTY, POWER OR FUNCTION OF THE MINISTER	POSITION TITLE & IF APPLICABLE, NAME OF PUBLIC BODY OR ORGANIZATION	SUGGESTED LEVEL OF DELEGATION
The head of a public body must decide within 30 days after notice is given under section 23 to give access to all or part of a record, provide the applicant and the third party with written notice of the decision and tell the third party of the right to request a review.		
DISCLOSURE OF INFORMATION IN THE PUBLIC INTEREST		
Section 25 – Information must be disclosed if in the public interest  The head of a public body must disclose information about a risk of significant harm to environment or to health or safety of the public or a group of people, or disclosure of which is clearly in the public interest.	Deputy Minister	Deputy Minister
DISCLOSURE OF INFORMATION WITHOUT AN FOI REQUEST		
Section 70 – Policy manuals available without request  The head of a public body must make available manuals, instructions, guidelines, or substantive rules or policy statements adopted by public body.	Executive Director	Executive Director
Section 71 – Records available without request  The head of a public body must establish categories of records available to the public without a request for access under the Act.	Executive Director	Executive Director
PRIVACY PROTECTION		
Section 29 – Right to request correction of personal information  The head of a public body must correct or annotate applicant's personal information on request.	Executive Director	Executive Director
Section 30.2 (2) – Obligation to report foreign demand for disclosure  The head of a public body must notify the minister responsible for this Act if a foreign demand for disclosure is received or unauthorized disclosure of personal information has occurred in response to a foreign demand for disclosure.	Assistant Deputy Minister	Assistant Deputy Minister
Section 30.5 (2) – Notification of unauthorized disclosure  The head must be notified by an employee, officer, or director of a public body, or an employee or associate of a service provider, if there has been an unauthorized disclosure of personal information that is in the custody or under the control of the public body.	Ministry Chief Information Officer in accordance with the Information Incident Management Policy	Ministry Chief Information Officer in accordance with the Information Incident Management Policy
Section 33.1 (1)(m) – Disclosure inside or outside Canada  For the purposes of authorizing disclosure inside or outside Canada, the head of the public body may determine that there are compelling circumstances affecting anyone's personal health or safety.	Assistant Deputy Minister	Deputy Minister
Section 69 (5) – Privacy Impact Assessments	Where Personal Information is involved:	Where Personal Information is involved:

DUTY, POWER OR FUNCTION OF THE MINISTER	POSITION TITLE & IF APPLICABLE, NAME OF PUBLIC BODY OR ORGANIZATION	SUGGESTED LEVEL OF DELEGATION
The head of a public body must conduct a privacy impact assessment (PIA) in accordance with	Assistant Deputy Minister	Assistant Deputy Minister
directions of the Minister responsible for FOIPPA.	Where no Personal Information is involved: Executive Director	Where no Personal Information is involved:  Executive Director
GENERAL		
Section 44 (4) – Examination of a record by the Commissioner  If a public body is required by the commissioner to produce a record and it is not practicable to make a copy, the head of the public body may require the commissioner to examine the original at its site.	Assistant Deputy Minister	Assistant Deputy Minister
Section 69 (4) – Correcting errors in Personal Information Directory  The head of a public body must correct any errors or omissions in personal information directory that relates to ministry and provide corrected information to Minister responsible for this Act.	Assistant Deputy Minister	Assistant Deputy Minister
Section 69 (5.5) – Notifying Commissioner of data-linking initiatives or common or integrated programs or activities  The head of a public body must notify commissioner of data-linking initiative or common or integrated program or activity.	Assistant Deputy Minister	*Note: CIRMO staff should liaise on communications with the Office of the Information and Privacy  Commissioner
Section 69.1 (4) – Health information banks  The head of a public body that is a healthcare body must (a) provide to the minister responsible for this Act information about health information banks of health care bodies and (b) correct as soon as possible any errors or omissions in the portion of the personal information directory that relates to the health care body, and provide the corrected information to the minister responsible for this Act.	N/A	Executive Director, Health Information Privacy, Security and Legislation
RECOVERY AND RETURN OF PERSONAL INFORMATION		
Section 73.1 – Recovery of personal information  The head of a public body may issue written notice demanding that a person or entity return personal information, securely destroy the information or respond in writing to declare they are authorized by law to possess this information.	Assistant Deputy Minister	Deputy Minister  With advice from Legal Services  Branch and CIRMO staff
Section 73.2 – Court order for return of personal information  The head of a public body may ask the Attorney General to petition the superior court for an order requiring return of personal information.	Assistant Deputy Minister	Deputy Minister
INFORMATION SHARING AGREEMENTS		

DUTY, POWER OR FUNCTION OF THE MINISTER	POSITION TITLE & IF APPLICABLE, NAME OF PUBLIC BODY OR ORGANIZATION	SUGGESTED LEVEL OF DELEGATION
Section 69 (5.7) – Information-sharing agreements  The head of a public body must prepare an information-sharing agreement in accordance with directions of Minister responsible for this Act.	Executive Director	Executive Director
FOIPPA REGULATION	•	
Section 7 (1) – Disclosure of information relating to mental or physical heath to a medical professional  The head of a public body may disclose information relating to the mental or physical health of an individual to a health professional for an opinion on whether disclosure of the information could reasonably be expected to result in grave and immediate harm to the individual's safety or mental or physical health.	Executive Director	Executive Director
Section 7 (3) – Requiring a health professional to enter into a confidentiality agreement or examine records on public body's premises  The head of a public body may require a health professional to whom information is disclosed under this section to do either or both of the following:  a) enter into a confidentiality agreement; b) examine the record containing the information on the public body's premises.	Executive Director	Executive Director
Section 7 (5) – Recommendation for accompaniment while viewing a record containing mental or physical health information  The head of a public body may recommend that an applicant who makes a request for access to a record containing information relating to the applicant's mental or physical health should not examine the record until a health professional or a member of the applicant's family is present to assist the applicant in understanding the information in the record.	Executive Director	Executive Director
12 (a)(i) Signing written agreement that confirms a common or integrated program or activity The head of each public body or agency must sign the written agreement that meets the requirements of section 12 of the regulation.	Assistant Deputy Minister	Assistant Deputy Minister

Pursuant to section 66 of the *Freedom of Information and Protection of Privacy Act* (the Act), I hereby delegate my powers, duties and functions as head of the public body to the persons who hold the positions, and to the extent, set out in the Schedule above, subject to the following conditions:

- (a) that the persons to whom my powers, duties or functions are delegated are bound in the exercise of those powers, duties or functions by the jurisdictional, legislative and administrative limitations to which I am subject;
- (b) that the powers, duties or functions delegated to any person may also be exercised by another person who holds the person's position in an acting capacity to which he or she has been duly appointed;
- (c) that, notwithstanding the delegation of my powers, duties or functions, I may exercise at any time any of the powers, duties or functions delegated.

This delegation is effective on and from the date shown below and shall remain in effect until revoked. This delegation may be revoked or amended.

	1 Chin	
Doug Caul, Deputy Minister		April 12, 2021
Name and position title of the head of the	Signature	Date

public body

### RECORDS DESTRUCTION AUTHORIZATION PROCESS

### MINISTRY OF INDIGENOUS RELATIONS & RECONCILIATION



Do you know what your responsibility as a public servant entails when it comes to deleting or destroying records?

Did you inherit a space with paper files crammed in the drawers, or were you tasked with cleaning out a long-forgotten file cabinet?

Have you been told you're not allowed to delete or destroy records, but you feel they're past their useful stage?

Does your LAN make your head spin with never ending folders, duplicates, and multiple versions of records?

Are you thinking, "Yes, but also... what's a record?" As per the *Interpretation Act*, a record includes books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is recorded or stored by any means whether graphic, electronic, mechanical, or otherwise.

MIRR has simplified our records destruction process. This means, if you have records that have reached their government shelf-life, or you're unsure if they have or not, there is a one-stop process to follow to request information, and, if appropriate, their destruction.

#### **PURPOSE**

MIRR's Records Destruction Authorization process meets Government Record Service's requirements to carry out the defensible destruction of information effectively, as set by the <u>Appropriate Information Destruction Guide</u>. Requirements are met by the establishment and of a defensible process which includes established roles and responsibilities, authorizations, and documentation managed in appropriate records management systems.

### **IN SCOPE**

Onsite disposal of physical and electronic information that have reached their scheduled final disposition for destruction according to ARCS/ORCS.

### **OUT OF SCOPE**

- Physical records in offsite storage facilities, managed by Government Record Service.
- Onsite destructions that do not require formal authorization:
  - Transitory Information, <u>Schedule 102901</u>.
  - o Category 1 and 2 of Redundant Source Information, Schedule 206175.
- Onsite record destructions, which require authorization from Government Records Service.
  - Category 3 and 4 of Redundant Source Information Schedule 206175, that either - do not have an approved information schedule - or have an approved disposition for archival appraisal.

### **ROLES AND RESPONSIBILITIES**

Within the process, there are two main roles held by division program areas and three main roles held by staff in the Information Management Branch – Central Records. These roles have defined responsibilities and training requirements – see Appendix A.

#### **PROCESS**

The Appropriate Information Destruction Guide identifies two types of destruction: Records Destruction Authorizations and Redundant Source Information Destructions. MIRR merged these into a simplified, single process containing one request form and one log of destruction number series – see Appendix B.

### REVIEW COMMITMENT

Each fiscal year-end, Information Management Branch – Central Records will evaluate the process's effectiveness and efficiency and adjust as necessary.

# APPENDIX A ROLES AND RESPONSIBILITIES

Location - Title	Role	Responsibility
Program Area Staff	Initiator	Advises IMB CR of request for destruction or removal of non-transitory physical or electronic records.
Program Area Senior Lead	Approver	Approves request for destruction or removal of records.
IMB CR Records Technician	Preparer	Prepares RDA package. Documents actions.
IMB CR Records Technician *Must be different from Preparer	Reviewer	Reviews RDA package for accuracy.
IMB CR Team Lead	Approver	Approves RDA package.

# APPENDIX B PROCESS

Role	Steps & Responsibilities
Program Area Staff Initiator	a) Advises IMB CR of request for destruction or removal of non-transitory physical or electronic records via email.
IMB CR Team Lead	<ul> <li>a) Contacts Initiator and gathers information on what needs are.</li> <li>b) Initiator sends files to Team Lead</li> <li>c) Team Lead forwards request to Preparer with instructions.</li> </ul>
IMB CR Records Technician Preparer	<ul> <li>a) Assigns request a destruction number in tracking log.</li> <li>b) Opens OPR ARCS 432-30 case file.</li> <li>c) Completes RDA form up to Section 3.</li> <li>d) Completes file list.</li> <li>e) Forwards RDA package to Program Area Manager for review and signed authorization using RDA email template.</li> </ul>
Program Area Senior Lead	a) Completes Section 3 and returns the package to IMB CR via email.
IMB CR Records Technician Preparer	a) Completes the log. b) Forwards to Reviewer.
IMB CR Records Technician Reviewer	<ul> <li>a) Reviews entire package.</li> <li>b) Ensures that all records have met their final disposition and all paperwork is correct and complete.</li> <li>c) Updates the log and forwards package to Team Lead for approval.</li> </ul>

IMB CR Team Lead	<ul> <li>a) Ensures all paperwork is correct and matches applicable retention schedule.</li> <li>b) If needed, follows-up with Reviewer or the Program Area Approver for more information.</li> <li>c) Once satisfied that everything is correct, grants approval.</li> <li>d) Sends package Preparer.</li> </ul>
IMB CR Records Technician Preparer	a) Destroys records.     b) Completes log and ensures all information has been recorded and case file is updated.

### Appendix C Naming Conventions

ARCS 00432-30	DE(CY)-###-(ministry acronym)
	e.g. DE23-001-IRR
	The DE# issued by Preparer, IMB CR.
RDA request form	RDA request DE(CY)-###
File list, ARSS661	File list DE(CY)-###

### RECORDS DESTRUCTION AUTHORIZATION PROCESS

### MINISTRY OF INDIGENOUS RELATIONS & RECONCILIATION



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MIRR's Records Destruction Authorization process meets Government Record Service's requirements to carry out the defensible destruction of information effectively, as set by the <u>Appropriate Information Destruction Guide</u>. Requirements are met by the establishment and of a defensible process which includes established roles and responsibilities, authorizations, and documentation managed in appropriate records management systems.

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From: (IRRFOI@gov.bc.ca)

To: Ponchet, Kim IRR:EX (Kim.Ponchet@gov.bc.ca); IRR Information Management

IRR:EX (IRRInformationManagement@gov.bc.ca)

**Subject:** \*NEW\* IRR Records Destruction Process

Sent:

Attachments: RECORDS DESTRUCTION AUTHORIZATION PROCESS.docx

Good morning/afternoon,

Do you know what your responsibility as a public servant entails when it comes to deleting or destroying records?

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Please reach out to Kim Ponchet or the Information Management Branch for more information.

[inset sig block]