



BC FREEDOM OF  
INFORMATION  
AND PRIVACY  
ASSOCIATION

February 11, 2010

The Hon. Gordon Campbell  
Premier of British Columbia  
PO Box 9041, Stn. Prov. Govt.  
Victoria, BC V8W 9E1

Dear Premier Campbell:

**Re: Speech From the Throne announcement of \$180 million  
for an Integrated Case Management System**

I am writing to you on behalf of the BC Freedom of Information and Privacy Association (FIPA) regarding the announcement this week in the Speech From the Throne of \$180 million to be spent on creating an Integrated Case Management system (ICM).

The ICM system will have a severe negative effect on both the privacy rights of British Columbians and the public purse. It will involve massive and unprecedented matching of personal information by the provincial government, which as last week's report by the acting Information and Privacy Commissioner clearly shows, has not demonstrated adequate policies, care or even competence at protecting privacy. Spending \$180 million to create a new system for using and disclosing personal information on this scale does not seem prudent, especially in tough economic times where we all must do more with less.

The ICM system and similar projects being planned across government raise concern about data mining, data matching and the creation of electronic profiles of individuals. It will create what are in effect massive dossiers of sensitive personal information about citizens without the consent of the individuals whose personal information will be shared. This is not only a wholesale invasion of privacy, it can also lead to 'social sorting' where individuals are put into categories based on their 'digital persona', which may bear little resemblance to the real person. This is alarming even without considering the probability that some of the information forming that digital persona will be incorrect. We are not yet talking about the almost inevitable and possibly catastrophic leaks or theft of information.

...2

In his last annual report, the former Information and Privacy Commissioner called on your government to hold off on any expansion of these programs until the risks to privacy can be assessed and dealt with. I have included a quote below in case you do not remember the former Commissioner's words.

It is certainly important that government not move forward with any legislated changes in this area unless and until there has been a full public consultation in the form of a position paper published by the government, followed by meaningful, extensive stakeholder consultations. Something in the order of a White Paper process would be appropriate.

I have not seen anything in the Speech from the Throne or elsewhere that your government will be introducing a position paper, or undertaking a "meaningful, extensive stakeholder consultation." Given the large amount of money involved, the serious risk to personal privacy rights and your government's record to date, we urge you to follow his sage advice before proceeding any further down this road.

Please feel free to contact us at any time if you have any questions or concerns.

Yours Truly,

A handwritten signature in cursive script, appearing to read "Darrell Evans".

Darrell Evans  
Executive Director

cc. Paul Fraser, Acting Information and Privacy Commissioner  
John Doyle, Auditor General for British Columbia