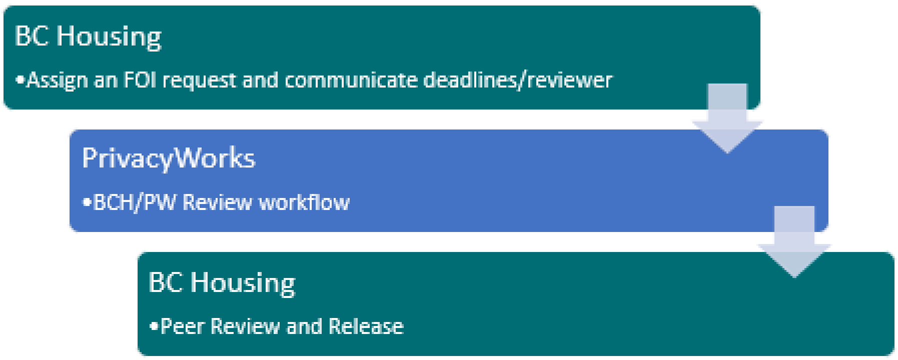
PrivacyWorks Consultation Flow and Expectations

Please note: this workflow reflects some proprietary information from PrivacyWorks in how they intake and process FOI requests. It is not for distribution.



When assigning a FOI request, BC Housing will:

- Provide collected records
- Provide a deadline by which we would like to have the records package available for review
- Identify a preliminary expectation of potential harms in the records, if applicable, informed by BC Housing context
- Indicate who will be the main point of contact and who will be the reviewer

In receipt of an FOI request, PrivacyWorks consultant to provide:

1. Review all basic information about the request
    a. Request description (original and any narrowing/clarification), including the time frame
    b. Applicant name/type (this information may be pertinent to right-of-access under sections 21, 22, etc.)
    c. Page volume, start date, legislated due date and extension history - Note whether additional time extensions may be needed/available.
    d. Any search/gathering notes provided by the client
2. Create a redline (not using Intella)
    e. Convert documents to PDF to create a combined, sorted PDF copy of the original records submitted by BC Housing
    f. Convert email attachments into Redline package alongside the email. If there are embedded links to which you do not have access, flag BC Housing contact to notify
    g. In the Redline, insert page numbers in the footer using the "page 1 of n" format (see Adobe – General Tips for instructions)
3. Initial Review
    h. Scan through the records received and flag/remove any that appear not-responsive to the request (wording, date range, etc.) as well as duplicate records and/or email threads. PrivacyWorks standard is to remove 100% of any duplicate records (this is a requirement of some clients)

        i. Not Responsive records should be extracted/removed from the redline and saved in the Review folder as a separate PDF called “NR Records.”
        ii. Duplicate records should be extracted/removed from the redline and saved in the Review folder as a separate PDF called “Duplicate Records.”
    i. Ensure records appear in chronological order, oldest to newest (some clients require this).
    j. Ensure all attachments have been received and follow after the parent email. If any attachments appear to be missing:
        iii. Check the original raw records sent by the client
    k. Contact the client and notify them of missing records/attachments.
    l. Flag all records authored by another public body that may require consultation (see Consultations) and/or records of a third party that may meet the 3-part test for s.21 and require third-party notification (see 3rd-Party Notice).
4. Line-by-Line Review
    m. Begin line-by-line review and apply redline using the Adobe Redact tool (if this is your first time using Redact, review the linked page to ensure its set up properly).
    n. Use Adobe annotations such as sticky notes and highlighting to flag potentially sensitive information or areas of concern that may require client input in order to arrive at a disclosure recommendation. Revisit during peer review and/or with the client to ensure they are aware of any concerns
5. Preparation of records package
    o. For records packages of 1000 pages or more, consider breaking up into ~500 page portions for review as-and-when available

Peer Review and Release – BC Housing:

6. Peer Review
    p. BC Housing will conduct peer review and communicate with the Consultant if any changes are required
7. Quality Assurance and Release
    q. BC Housing will conduct QA check and release records to the requestor

BC Housing severing standards and guidelines

- s.22 severing of signatures
- s.22 severing of third parties for whom we do not have consent