

First Peoples' Heritage, Language and Culture Council

FIPA Access Assessments

This organization was listed as an independent public body at the start of 2024 under British Columbia's [Freedom of Information and Protection of Privacy Act](#) (FOIPPA) and the [Information Management Act](#) (IMA).

FIPA conducts empirical research as part of its program activities. Its access assessment activities are meant to monitor freedom of information. <https://fipa.bc.ca/research-resources/access-assessments/>

This PDF contains the requests that were sent to this public body, as well as the records that were subsequently released.

These records were originally collected as data for a more in-depth study as part of FIPA's empirical research. That involved submitting focused freedom of information (FOI) requests to determine how this public body, which we classified as part of the broader public sector, was interpreting and applying FOIPPA and IMA legislation.

That project is called *Access Regimes: Social Studies of Recordkeeping, Bureaucracy, and Secrecy under Freedom of Information Law*. Further information about that study can be found on the Open Science Foundation's [registration platform](#).

Distinct from the original study, FIPA has also assessed whether this public body meets expectations identified in an IPSOS poll we commissioned. That poll can be found on the FIPA website here. <https://fipa.bc.ca/first-peoples-heritage-language-and-culture-council/>

About FIPA

The BC Freedom of Information and Privacy Association (FIPA) is a non-partisan, non-profit society that was established in 1991 to promote and defend freedom of information and privacy rights in Canada. While we are based in BC, our membership extends across Canada, and we regularly partner with organizations throughout the country.

Our goal is to empower citizens by increasing their access to information and their control over their own personal information. We serve a wide variety of individuals and organizations through programs of public education, public assistance, research, and law reform. We are one of very few public interest groups in Canada devoted solely to the advancement of freedom of information and privacy rights.

Requests sent to broader public sector organizations

Request item 1

Current organizational charts that indicate freedom of information personnel and information management personnel.

Summary

Charts that outline where freedom of information personnel and information management personnel exist within an organization.

Rational

Organizational charts help identify who is responsible for fulfilling certain obligations.

Request item 2

Delegation of authority charts for the Freedom of Information and Protection of Privacy Act.

Summary

Charts that outline who has certain powers under the Freedom of Information and Protection of Privacy Act.

Rational

Delegation of authority charts are standard instruments across the implementation of any law with delegable and discretionary powers.

Request item 3

Policies or procedures regarding freedom of information (not privacy), including policies and procedures regarding the routine release of information and proactive disclosure.

Summary

Freedom of information policies.

Rational

Policies are the core of implementing any new public initiative.

Request item 4

Final reports regarding the public body's performance reporting, program evaluations, or project implementation plans or proposals with respect to freedom of information.

Summary

Internal reports about freedom of information.

Rational

How public bodies monitor their performance matters.

Request item 5

Delegation of authority charts for the Information Management Act, as applicable.

Summary

Charts that outline who has certain powers under the Information Management Act.

Rational

Delegation of authority charts are standard instruments across the implementation of any law with delegable and discretionary powers.

Request item 6

Interoffice memoranda about freedom of information and records/information management.

Summary

Memos about freedom of information and records/information management.

Rational

Internal communications can structure organizational activity.

Request item 7

Metadata Application Profiles and records disposition models, as well associated policies and procedures and implementation plans and reports.

Summary

Metadata schemas for records management systems.

Rational

Metadata is an essential part of establishing control over records.

Request item 8

Office of primary responsibility designations/matrices.

Summary

Lists of offices responsible for certain organizational records.

Rational

Lists like this are often a reflection of the classification logics used to manage records.

Request item 9

Technical manuals for records management systems.

Summary

User manuals for records management software.

Rational

Manuals contribute to how staff interact with technology.

Request item 10

Acceptable use of technology policy instruments (where “instrument” has the same meaning as in [Treasury Board Directive 1/23](#) and onboarding manuals.

Summary

Acceptable use of technology policies.

Rational

Acceptable Use Policies govern how employees may appropriately interact with technology over the course of their job.

Request item 11

File plans/lists/indexes and/or records management ontologies/thesauri.

Summary

Lists of regularly created files.

Rational

File lists are a prerequisite to an up-to-date file classification plan.

Request item 12

Public body self-assessments and audits/evaluations of records/information management.

Summary

Self-assessments conducted according to an internal government standard.

Rational

Regular reviews of records management is best practice in information governance.

Request item 13

Policy instruments regarding records or information management.

Summary

Records management policies.

Rational

Policies are the core of implementing any new public initiative.

Request item 14

Copies of record retention schedules.

Summary

Record retention schemas.

Rational

Retention schedules are the key instrument in asserting control over records classification and retention.

Request item 15

The public body's information resources/information asset plans/records management plans, as applicable.

Summary

Records management plans.

Rational

Records management is something that must be planned out carefully.

Request item 16

Licenses, contracts, or agreements between the public body and recordkeeping system service providers or contractors.

Summary

Contracts for recordkeeping systems.

Rational

Contracts detail roles and responsibilities with respect to system implementation and maintenance.

Request item 17

Final jobs description files for any employee who regularly performs a role or responsibility (1) in responding to a freedom of information request or (2) fulfilling public body's records/information management needs, including if those job descriptions do not explicitly mention FOI requests or records/information management.

Summary

Job descriptions for records management and freedom of information staff.

Rational

Job descriptions articulate the necessary skills and anticipated responsibilities of people charged with doing FOI or RM work.

Request item 18

Records confirming the appointment and responsibilities of subdivisional freedom of information (not privacy) or records management 'champions,' (i.e. an ambassador for records management or FOI within a particular unit, such as FOI Oversight Liaison Officers or Duty to Document Champions), if any. (If applicable roles exist, kindly include memorandums, plans, or reports issued by those persons).

Summary

Records concerning the appointment of employees responsible for promoting freedom of information and records management.

Rational

Internal promotion of FOI and RM contributes to effective implementation.

Request item 19

Organizational charts that include records/information management personnel (or the relevant organizational charts if your public body does not have dedicated RM/IM personal).

Summary

Charts that outline where freedom of information personnel and information management personnel exist within an organization.

Rational

Organizational charts help identify who is responsible for fulfilling certain obligations.

Request item 20

Final training packages (i.e. presentation slides, etc.) and training implementation history files (e.g. reports of completion, etc.) for freedom of information and records/information management, including initial training specific to FOI analysts/coordinators.

Summary

Training materials for freedom of information and records management.

Rational

Training is necessary for the successful implementation of FOIPPA and IMA.

Request item 21

internal surveys and the results of surveys concerning records/information management of freedom of information.

Summary

Surveys about records management and freedom of information.

Rational

Surveys of staff provide insight into the state of records management and freedom of information.

Request item 22

“Documenting government decisions” policy instruments (where “instrument” has the same meaning as in [Treasury Board Directive 1/23](#)).

Summary

Duty to document policies.

Rational

The Chief Records Officer has developed directives instructing public bodies to develop organization-specific policies for documenting government decisions.

Request item 23

Final Requests for Proposals concerning records management/freedom of information (not privacy).

Summary

Requests for proposals for freedom of information and records management projects.

Rational

RFPs document a public body's needs in order to identify the solutions they are seeking proposals to address.

Request item 24

Copies of checklists, forms, templates, guides and other tools used in relation to processing freedom of information requests.

Summary

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Rational

Workflow materials for freedom of information processing.

Request item 25

Contracts and statements of work for consultant services for freedom of information/records management work.

Summary

Contracts and statements of work for consultants' work related to freedom of information and records management.

Rational

Contracts and statements of work define the boundaries of what work the public body performs and what work it relies on others' to perform.

Request item 26

Case management procedures (i.e. how analysts are assigned, what data is to be logged, how to notify program areas, etc.) for freedom of information requests.

Summary

Procedures for managing request workflows.

Rational

Case management software helps public bodies keep track of requests and organize their responses.

Request item 27

Copies of any plans or assessments done in preparation for the application of the Information Management Act (e.g. Readiness Assessments for the provision relating to document government decisions).

Summary

Reports produced to prepare to implement duty to document.

Rational

These reports established the baseline position from which duty to document was purportedly implemented.

Request item 28

Any previously unrequested/undisclosed records that assist in understanding how (1) records management is practiced in your public body, or (2) how decisions about freedom of information requests are made and how they are processed (e.g. any document, including an intranet file or records of another public body, that an employee references in the course of processing a request or describes how to apply exceptions, search for records, etc.).

Summary

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Rational

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SCHEDULE "A"

DIRECTOR OF INFORMATION TECHNOLOGY (IT)
JOB DESCRIPTION

PURPOSE OF THE POSITION

Reporting to the CEO, as the Director of Information Technology (IT), you will provide leadership and direction on information management and information technology systems ensuring alignment with First Peoples' Cultural Council (FPCC) plans, policies, and standards. In this role you will deliver technology-enabled business transformation, and oversee the design, build and maintenance of all business applications.

You will lead, guide, and support a collaborative, diverse and talented team and collaborate and support senior leaders across FPCC. The Director of IT delivers application strategies and solutions across multiple technologies and clients, leading and contributing to the goals of the FPCC IT blueprint and Service Plan.

RESPONSIBILITIES

Operations Management

- Oversee all IT operations infrastructure
- Provide leadership, direction and motivation to a diverse team to deliver performance excellence and high levels of engagement. Including assignment of work, development and evaluation of performance, and approval of leave
- Ensure the maintenance of current technology systems
- Identify system vulnerabilities, the need for upgrades, and opportunities for improvement
- Propose strategic solutions and recommend new systems and software
- Provide IT infrastructure planning, business process mapping, change and project management support, investment planning including IT security and privacy support
- Lead, develop, implement, and support information management and information technology solutions
- Direct Quality Management Initiatives and Programs for the IT Department
- Define/manage team service levels ensuring the alignment of key IM/IT services with the business strategy by identifying service requirements/levels and monitoring outcomes
- Ensure reported issues are resolved in a timely manner
- Liaise with other departments to determine and address their IT needs and requirements



Project Management and Business Transformation

- Develop, implement, and evaluate IT projects in line with organizational objectives
- Oversee project management ensuring time frames, budget, and quality are met, ensuring stakeholder participation and monitoring of project risks and progress
- Direct the development of IM/IT Application strategy and advise the CEO and Program Managers on strategic direction for IM/IT business system investment and development
- Direct and oversee application development and maintenance projects for the IM/IT service delivery managed by the IT team representing the FPCC on CCEA
- Establish FPCC system lifecycle development standards, from concept to decommissioning, ensuring the application development aligns with the architectures and strategies consistent with Crown Corporation practices and ensures adherence to the standards
- Lead business analysis services for stakeholders/employees, understand FPCC and departmental business needs and priorities, and be a trusted advisor to employees on the successful use of IM/IT business applications and budgets
- Ensure that appropriate system design guidelines are developed and updated, reports are provided, and system designs will achieve business unit and budgetary goals
- Direct business requirements gathering, define impact assessments, support priorities identified by managers and Executive and ensures business requirements are delivered by the solutions

Reporting, Financial and Contract Management

- Work in partnership with central agencies to ensure corporate requirements are met
- Define, negotiate, and manage third-party service agreements to ensure compliance with requirements and adherence to negotiated agreements
- Prepare financial budgets and performance reports
- Build and maintain relationships with external advisors and vendors
- Ensure innovative cost-effective solutions to ensure the organization manages risks
- Performs other duties as required



BASIC QUALIFICATIONS

Education, Training and Experience

- Bachelor's Degree, Master's degree preferred, in computer science and information systems
 - Minimum 5 years of recent, related experience managing a diverse applications development team
 - Previous experience managing a large, global development team is an absolute must with proven success in building and managing the DevOps process by incorporating Agile principles and practices
 - Proven background in managing cloud applications, web services, and integration of a variety of methods; and deep knowledge of system architecture, technical design, and system software development technology
 - Experience leading with best practices in diversity, equity, and inclusion
 - Business consulting experience with the ability to understand the strategic goals and priorities using the right technology to deliver programs/services to stakeholders and businesses
 - Experience achieving innovative, cost-effective solutions that enable employees/stakeholders to manage risk and deliver effective programs
 - Experience with strategic planning and business transformation in a technology dependent business area or information systems branch
 - Experience managing and supervising a diverse group of employees, project teams, and monitoring budgets
 - Experience leading, developing, implementing, and supporting information management and information technology solutions in a complex system environment
- Skills and Abilities Must possess demonstrated ability as outlined below:

SPECIFIC ACCOUNTABILITIES AND DELIVERABLES

Skills and Abilities

- Experience working in a fast-paced environment with an ability to set priorities, plan, organize, and effectively manage a workload with multiple competing priorities
- Proven leadership, interpersonal, and management IT skills in the latest technologies
- A proven leader with excellent communication skills who can rally a diverse team around a technology strategy and business vision
- Excellent written and verbal communication skills with the ability to break down complex technical concepts into 'Business-friendly' terms
- Ability to discuss financial issues in a language suitable to the audience
- Advanced analytical and problem-solving skills including the ability to resolve complex budgeting and financial issues and review and comprehend statistical data and financial reports
- Ability to make decisions, provide strategic advice/ and assistance to stakeholders, CEO, and BODs



- Knowledge of and experience working with First Nations and Indigenous communities in BC and a working knowledge, understanding, and familiarity of First Nations history, communities, cultures, traditions, and practices
- Ideally brings an Indigenous point of view and an **understanding** of the importance of what FPCC does and the value of Indigenous arts, heritage, languages, and cultures

Working Conditions

- May work partially remotely with home office location located within acceptable driving distance
- All work is done in a general office environment
- Travel for meetings may be required
- May be required to work evenings and weekends

FINANCIAL RESPONSIBILITY

- Required to follow policies and procedures as outlined in the FPCC Employee Administration Policy Manual.

DIRECT SUPERVISION

Yes

TOOLS/EQUIPMENT

- Computer for word processing, electronic mail, spreadsheets, presentations, reports
- Proficiency with the MS Office Suite
- Standard office equipment: facsimile, photocopiers, cell phone, audio visual equipment.



SCHEDULE "A"

DIRECTOR OF FINANCE
JOB DESCRIPTION

PURPOSE OF THE POSITION

The Director of Finance (DOF) reports directly to the Chief Executive Officer (CEO) and is a member of the Management Team providing in-house strategic and operational advice, guidance, and direction to finance staff and management. The DOF is expected to operate within the confines of the FPCC vision, mandate, policy, and standard operating procedures, while ensuring the foundational principles as outlined in the Mandate Letter are incorporated into programs and policies.

The DOF maintains a high standard of financial management ensuring accurate and timely financial reporting for the Chief Executive Officer (CEO), the Board of Directors (BOD) for the FPCC and FPCF, and various stakeholders, including government funders and other agencies.

RESPONSIBILITIES

Financial Management

- Provides the CEO and BOD with clear and accurate forecasting, reporting, planning, and analysis based on Board policy and organizations goals.
- Works with the CEO and management, to establish financial and operating benchmarks, budgets, program monitoring, and KPI reporting standards on a bi-weekly, monthly, quarterly, and annual basis.
- Develops and maintains a comprehensive financial plan to ensure the organizations are financially viable and fiscally responsible.
- Coordinates and prepares the annual operating budget including short- and long-term financial planning and analysis.
- Works with the management team overseeing the annual budget process by establishing guidelines for the budget and forecast preparation.
- Monitors overall expenditures and reports on budget vs. actuals.
- Prepares periodic forecasting and tests for reliability of details, reviews, analyzes and recommends solutions to the CEO regarding material variances.
- Supports the CEO and Managers with budget presentations to the BOD.

- Reviews and monitors all contribution agreements to ensure that allocations are accurate, spending is within budget limits, and communicates with project managers regularly to resolve any concerns.
- Provides the CEO, BOD, and Managers with financial information vital to decision making.
- Supervises staff responsible for accounts payable and receivable.
- Prepares bi-weekly payroll, maintains, and reconciles all payroll records including issuing Records of Employment, T4's, and periodic remittances to CRA and WCB.
- Prepares working papers as required, assists the auditors with the annual audit as required and ensures all files are ready for review by auditor.
- Provides recommendations on changes to financial policies or procedures to ensure internal controls meet audit requirements.

Reporting and Contract Management

- Prepares all financial reports for funder contracts, including project financials, crown agencies, Canada Revenue Agency, Central Agencies, and ad-hoc reports as required.
- Oversees the financial accounting systems for cash management, accounts payable, accounts receivable, credit control, deposits, and petty cash.
- Manages and monitors all accounts, ledgers, and reporting systems ensuring compliance with appropriate standards and regulatory requirements including local, provincial/state, and federal government reporting requirements, remittances, and tax filings.
- Manages critical deadlines for numerous contracts.
- Coordinates all external audit activities including the annual financial audit of the FPCC and FPCF.
- Develops the financial portion of the quarterly reports for government and other funders.
- Develops the financial portion of the Annual Report ensuring reporting requirements.
- Develops ad-hoc, monthly and annual financial statements for management, the BOD and Program Managers.
- Responds to enquiries from funding agencies with respect to financial information.

- Works with management and provides guidance to ensure contracts with external parties have clear deliverables, timelines and payment schedules including the negotiation and management of employee insurance and benefit program.
- Reviews all proposed project budgets prior to proposal submission.
- Ensures invoices are in line with the contracts before payment is made, and contracts are standardized and structured appropriately.
- Prepares of year-end financial statements in a timely manner.
- Oversees banking relationships, including negotiating lending and other financial services such as working capital management (i.e., banking, credit cards).
- Reviews funding contracts and performs risk assessment before CEO approval.

SPECIFIC ACCOUNTABILITIES AND DELIVERABLES

Skills and Abilities

- Knowledge of Generally Accepted Accounting Principles (GAAP) and regulations such as CRA, Societies Act, and various tax and procurement related acts.
- Working knowledge of principles and practices in budgeting financial planning, accounting and cost control processes and methods in the non-profit sector.
- Thorough knowledge of Excel and software accounting systems. Specific experience with Adagio, Paydirt and QuickBooks (including departmental and project costing) is considered an asset.
- Thorough knowledge of risk management and implementation of procedures to mitigate risk and liability.
- Excellent written and verbal communication skills with the ability to discuss financial issues in a language suitable to the audience.
- Advanced analytical and problem-solving skills including the ability to resolve complex budgeting and financial issues, review and comprehend statistical data and financial reports and negotiate appropriate solutions.
- Ability to research, analyze and merge complex subject matter to summarize, identify issues and trends, and generate recommendations in a language suitable to the audience.
- Ability to make decisions, provide advice and assistance to stakeholders, CEO, and BOD.

- Ability to set priorities, plan, organize, and effectively manage a workload with multiple priorities.
- Working knowledge, understanding and familiarity of First Nations history, communities, cultures, traditions, practices is desirable.

Education and Training

- Accounting designation (CPA) or a post-secondary degree in Accounting, Commerce, or Business Management.
- Minimum of 5 years in a senior accounting role.
- Minimum 2 years of supervisory experience leading a diverse team of professionals required. A combination of equivalent education, training, or experience in a similar field or in a non-profit or government environment may be considered.
- Coursing with the Aboriginal Financial Officers Association of BC would be considered an asset.
- Demonstrated experience with Profit & Loss management, financial modeling, forecasting, reporting and analysis.

Working Conditions

- Most work is done in a general office environment
- Travel to attend meetings, conferences, seminars may be required
- May be required to work occasional evenings and weekends

FINANCIAL RESPONSIBILITY

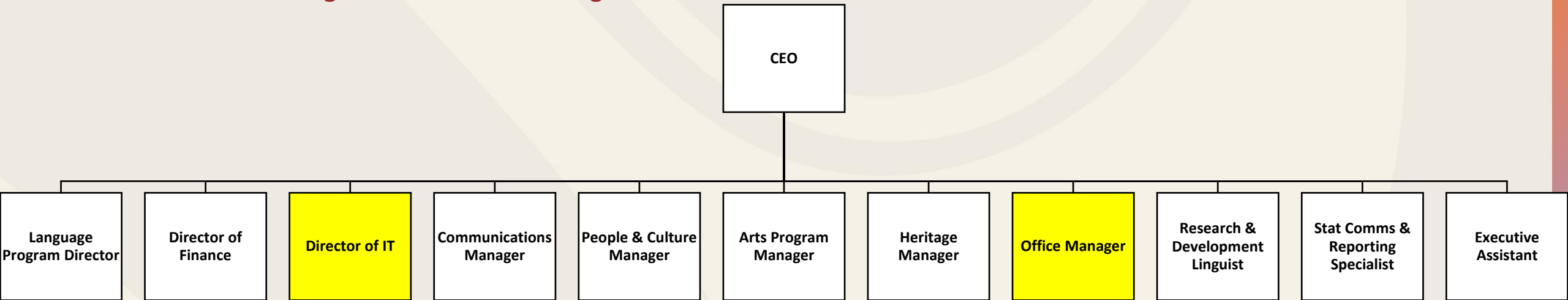
- Required to follow policies and procedures as outlined in the FPCC Employee Administration Policy Manual.

DIRECT SUPERVISION



EXECUTIVE TEAM ORG CHART – FOI

Privacy Officer – Director IMIT
Records Management – Office Manager





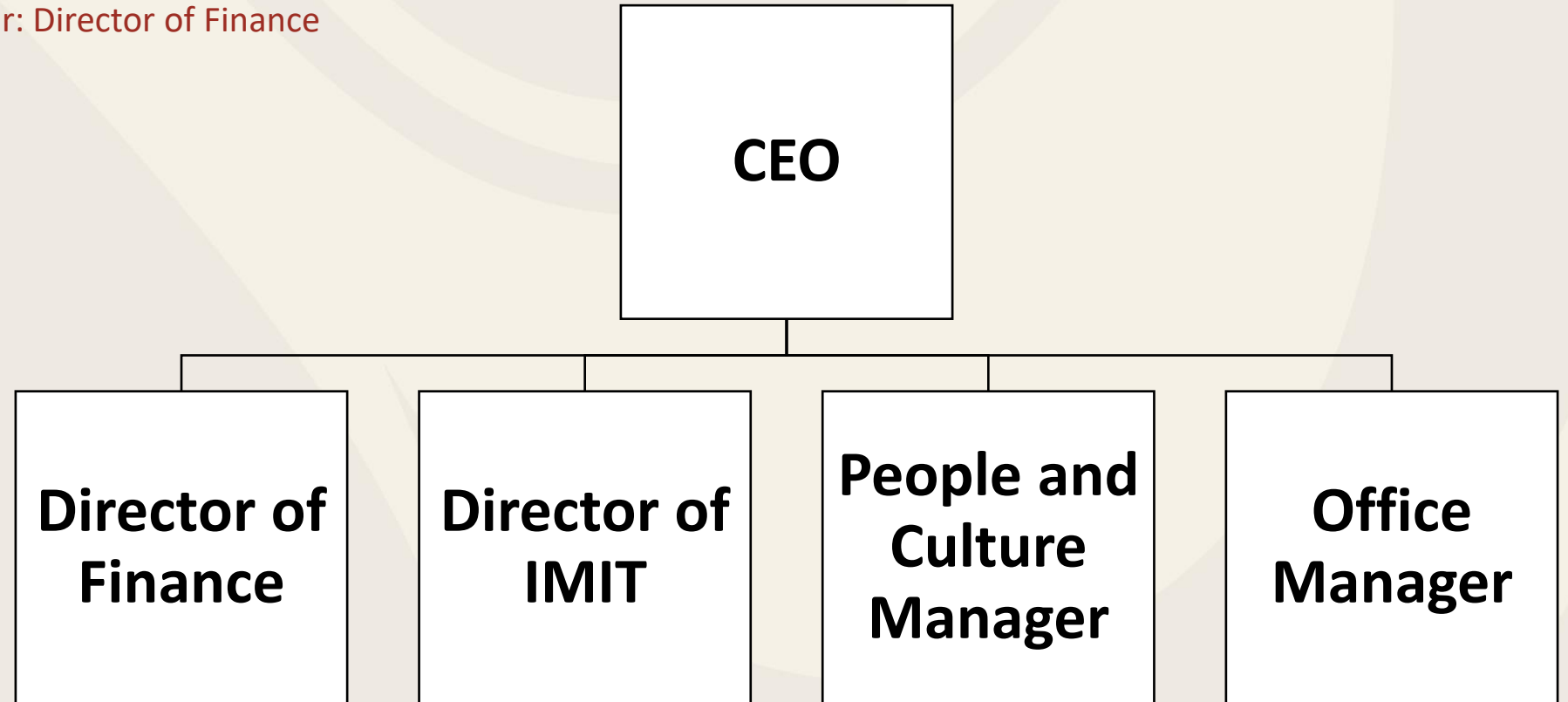
Records / Information Management Personnel

Records Management: Office Manager

Information Management / Privacy Office: Director IMIT

Employee Records Management: People and Culture Manager

Financial Records Manager: Director of Finance





FPCC Freedom of Information and Protection of Privacy Policy

Date: November 29, 2023

1. Policy Statement

FPCC is committed to protecting personal information. It collects, uses, shares and retains through responsible information management practices. FPCC collects, uses and shares personal information provided to FPCC in compliance with FOIPPA.

The *Freedom of Information and Protection of Privacy Act (FOIPPA)* gives the public a general right of access to information held by British Columbia public bodies, subject to certain conditions and exemptions. The public have an unrestricted right to access their personal information held by public bodies. There is no limitation on who may request access to the information, or for what purpose.

2. Purpose

The purpose of this policy is:

- a) to provide employees with a process for responding to Freedom of Information (FOI) requests and complaints;
- b) to provide employees with procedures for making an FOI request or issuing a complaint.
- c) to meet FPCC's responsibilities under the *Freedom of Information and Protection of Privacy Act*.

3. Scope

This policy applies to all employees and former employees of FPCC.

For more information on the collection, use and disclosure of personal information and the protection of personal information, see the FPCC Privacy and Security Policies.

4. Definitions

"FOIPPA" the *Freedom of Information and Protection of Privacy Act*

"FOI Request" means Freedom of Information Request.

"Privacy Officer" means the Director of Information Technology/Information Management.

“CEO” the most Chief Operating Officer an employee as set out in FPCC organizational chart.

“Employee” any current or former employee of FPCC.

“Public Body” a British Columbia ministry, office or government body or crown corporation as defined in the Act

“Manager” for each employee is the person to whom they report on the FPCC organizational chart.

“Record” includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means. Records also include email and information stored on magnetic media, such as video or cassette tapes. However, the definition of a record under FOIPPA does not include a computer program or any other mechanism that produces records.

“Redaction” means the process of editing text to remove or obscure part of the text for legal or security reasons.

“Requestor” is the individual member(s) of the public making the FOI request.

5. Responsibilities

5.1 Employees

- Any employee who receives a Freedom of Information request through any medium (via email, form submission, mail) should report the details of the request to their Manager or the Privacy Officer.
- Employees should not respond directly to a Freedom of Information request or contact the requestor without approval from the Privacy Officer.
- Employees may be asked to respond directly to an FOI request, with verbal approval from the Privacy Officer, if the records requested are Routine Release records (see Appendix A), or the records are already available on the FPCC website.
- Employees may be asked by their Manager or the Privacy Officer to provide documents that support the FOI request, in any format. It is the responsibility of the employee to produce these documents.
- The employee is not responsible for providing a complete set of records in response; however, the employee should make every attempt to ensure that all requested records are located.

5.2 Managers

- Managers are responsible for supporting employees in searching for records requested in an FOI request.
- Managers must ensure that employees have appropriate access to the records they need to search. If access is not permitted, the Manager should support the search for records.
- Managers may be asked to review records or redact portions of text within records for legal, security or cultural sensitivity purposes.

5.3 Privacy Officer

5.3.1 Providing Guidance

- Providing advice about the *FOIPPA* and this policy.
- Directing employees to additional resources and options for responding to a Freedom of Information request, such as any e-discovery tools available.

5.3.2 Receiving and responding to FOI requests

- Responding to FOI requests from members of the public and ensuring that all records matching the request are located and provided.
- Supporting employees and Managers in discovery of requested records and providing open access to records repositories that need to be searched.
- Reviewing records that require redaction before submission to the requestor.

5.3.3 Communicating Outcomes

- Following the procedures in this policy and as outlined in *FOIPPA*.
- Communicating outcomes as prescribed in *FOIPPA*.

5.4 CEO

- Ensuring information about FOIPPA is available to employees, and procedures clearly outline how to respond to an FOI request, how to make an FOI request and their responsibilities under FOIPPA.
- Notifying the Board of lack of compliance and subsequent recommendations.
- Notifying the Office of the Information and Privacy Commissioner (OIPC) as required.

6. Procedures

6.1 FOI Requests

- 6.1.1 An individual(s) making an FOI request must contact FPCC directly in writing.
- The requestor should provide as much detail as possible for the information.
 - The Privacy Officer or Manager may request additional information or clarification.
- 6.1.2 Individuals must specify if they are asking for recordings containing their personal information.
- (a) FPCC may not charge fees if the records contain the requestor's personal information.
 - (b) FPCC may charge fees for requests for public body records according to the fee schedule detailed in Appendix B.
- 6.1.3 The Privacy Officer has 30 days to respond to an FOI request.
- (a) If the request is for a large volume of records, requires more clarification or is complicated, FPCC may notify the requestor that an additional 30 days is required.
 - (b) If FPCC is unable to complete the request after an additional 30 days, FPCC may contact the Office of the Information and Privacy Commissioner (OIPC) to request an additional 30 days.

6.2 Corrections

- 6.2.1 An individual may request a correction to records containing their personal information.
- 6.2.2 The requestor must contact FPCC directly in writing to request a correction.
- 6.2.3 FPCC may correct the personal information and make a note beside it showing the requested correction.

6.3 Complaints and Reviews

- 6.3.1 Individuals who wish to register a complaint about the records received from FPCC must do so with the Office of the Information and Privacy Commissioner (OIPC).
- 6.3.2 The OIPC will contact FPCC if a request for review or a complaint has been issued.
- 6.3.3 FPCC has 30 days to respond to requests for review or complaints and can request a time extension from the OIPC.

Appendix A: Routine Release Records Policy

1. Policy Statement

- FPCC routinely releases records to the public, via the website, that may be frequently requested through FOI requests.
- The purpose of the routine release of records is to anticipate the records that members of the public may request to decrease the amount of time that employees need to spend responding to FOI requests.
- There is no fee charged for access to Routine Release Records.
- Resources are not considered Routine Release Records. Resources include funding toolkits, language resources and toolkits, maps and other publicly-designed tools for general access on the website.
- FPCC is also in compliance with the Public Disclosure Act (PIDA) and releases records in compliance with this Act.

2. Routine Release Records List and Frequency

Annual Reports	Once per year
Grant and Funding Reports	At completion of grant or funding cycle
Government's Letters of Expectation	At end of Fiscal Year
Mandate Letters	Once per year
Board Remuneration	At end of Fiscal Year
Annual Statement of Financial Information	Once per year
Annual Service Plans	Once per year
Annual Reports to Government	Once per year

Appendix B: Fee Schedule

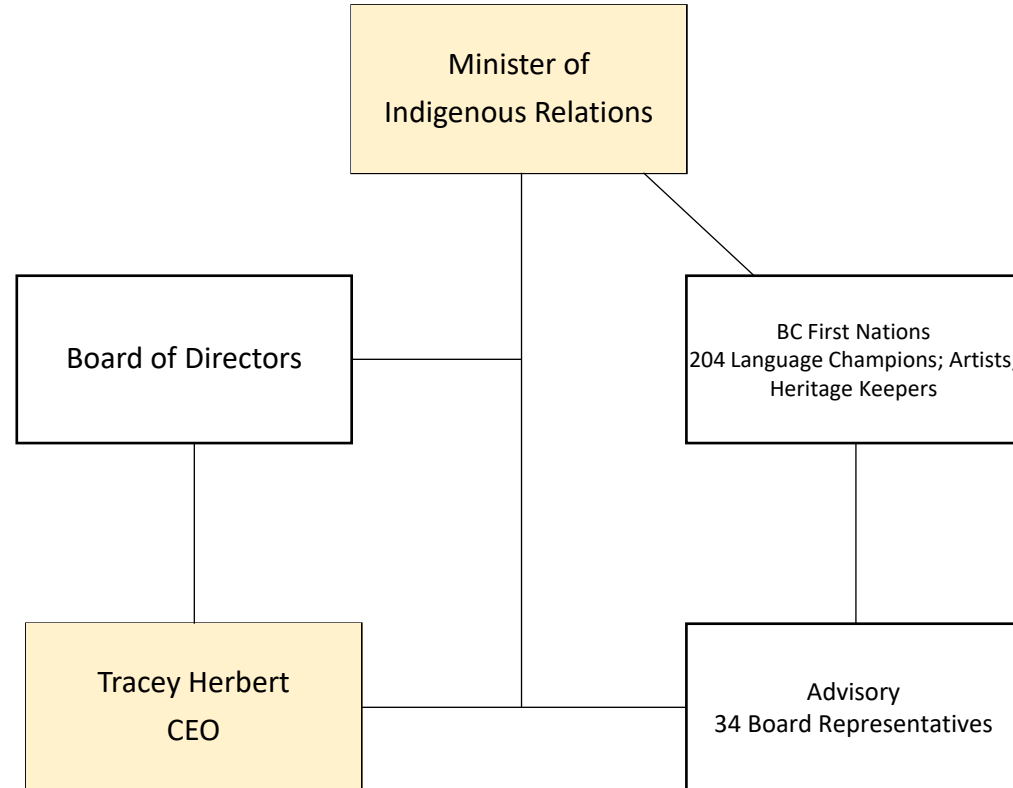
Item	COLUMN 1	COLUMN 2
	Description of Services	Management Fees
1	For applicants other than commercial applicants:	
	(a) for locating and retrieving a record	\$7.50 per 1/4 hour after the first 3 hours
	(b) for producing a record manually	\$7.50 per 1/4 hour
	(c) for producing a record from a machine readable record from a server or computer	\$7.50 per 1/4 hour for developing a computer program to produce the record
	(d) for preparing a record for disclosure and handling a record	\$7.50 per 1/4 hour
	(e) for shipping copies	actual costs of shipping method chosen by applicant
	(f) for copying records	
	(i) floppy disks	\$2 per disk
	(ii) CDs and DVDs, recordable or rewritable	\$4 per disk
	(iii) computer tapes	\$40 per tape, up to 2 400 feet
	(iv) microfiche	\$3 per fiche
	(v) microfilm duplication	\$25 per roll for 16 mm microfilm, \$40 per roll for 35 mm microfilm
	(vi) microfiche or microfilm to paper duplication	\$0.50 per page (8.5" x 11")
	(vii) photographs, colour or black and white	\$5 to produce a negative
		\$12 each for 16" x 20" photograph
		\$9 each for 11" x 14" photograph
		\$4 each for 8" x 10" photograph
		\$3 each for 5" x 7" photograph
	(viii) photographic print of textual, graphic or cartographic record, black and white	\$12.50 each (8" x 10")
	(ix) dot matrix, ink jet, laser print or photocopy, black and white	\$0.25 per page (8.5" x 11", 8.5" x 14" or 11" x 17")
	(x) dot matrix, ink jet, laser print or photocopy, colour	\$1.65 per page (8.5" x 11", 8.5" x 14" or 11" x 17")
	(xi) scanned electronic copy of a paper record	\$0.10 per page
	(xii) photomechanical reproduction of 105 mm cartographic record/plan	\$3 each

	(xiii) slide duplication	\$0.95 each
	(xiv) audio cassette tape (90 minutes or fewer) duplication	\$5 per cassette plus \$7 per 1/4 hour of recording
	(xv) video cassette recorder (VHS) tape (120 minutes or fewer) duplication	\$5 per cassette plus \$7 per 1/4 hour of recording
2	For commercial applicants for each service listed in Item 1	the actual cost to the public body of providing that service

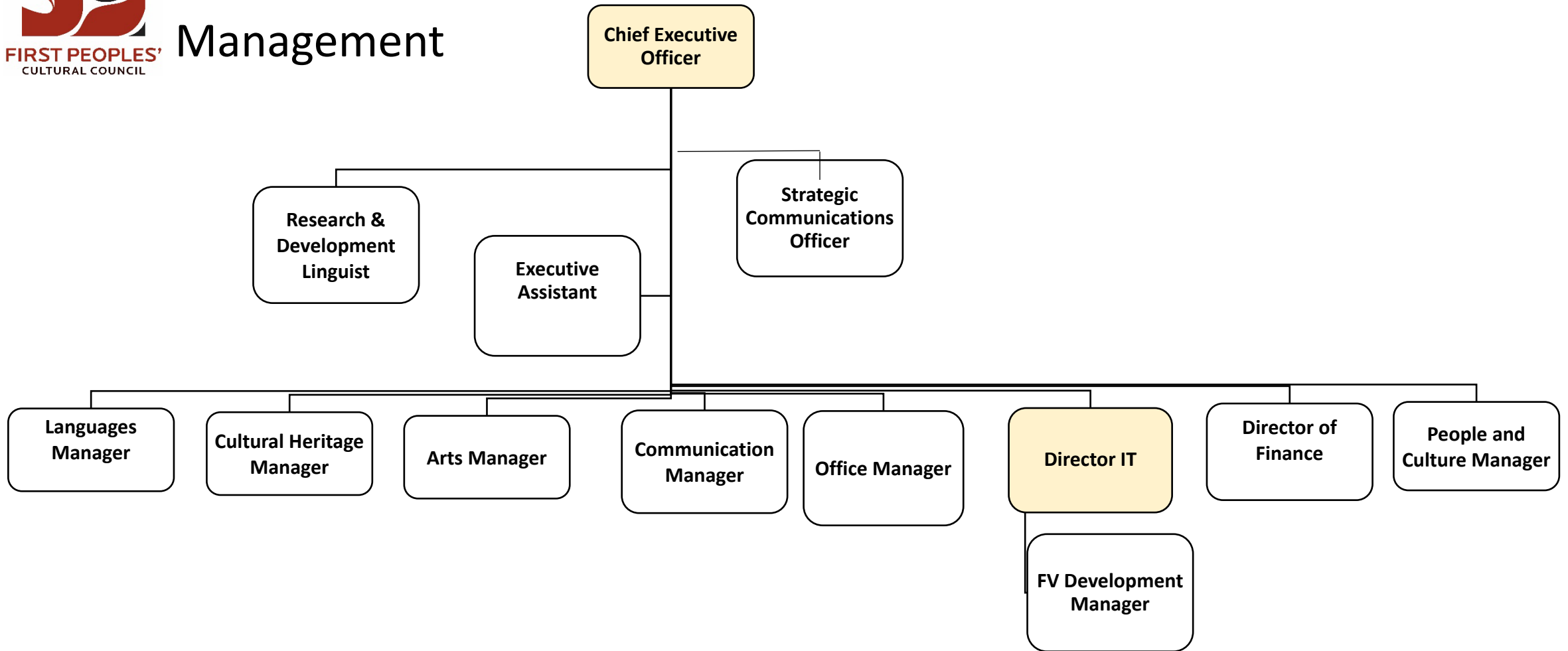


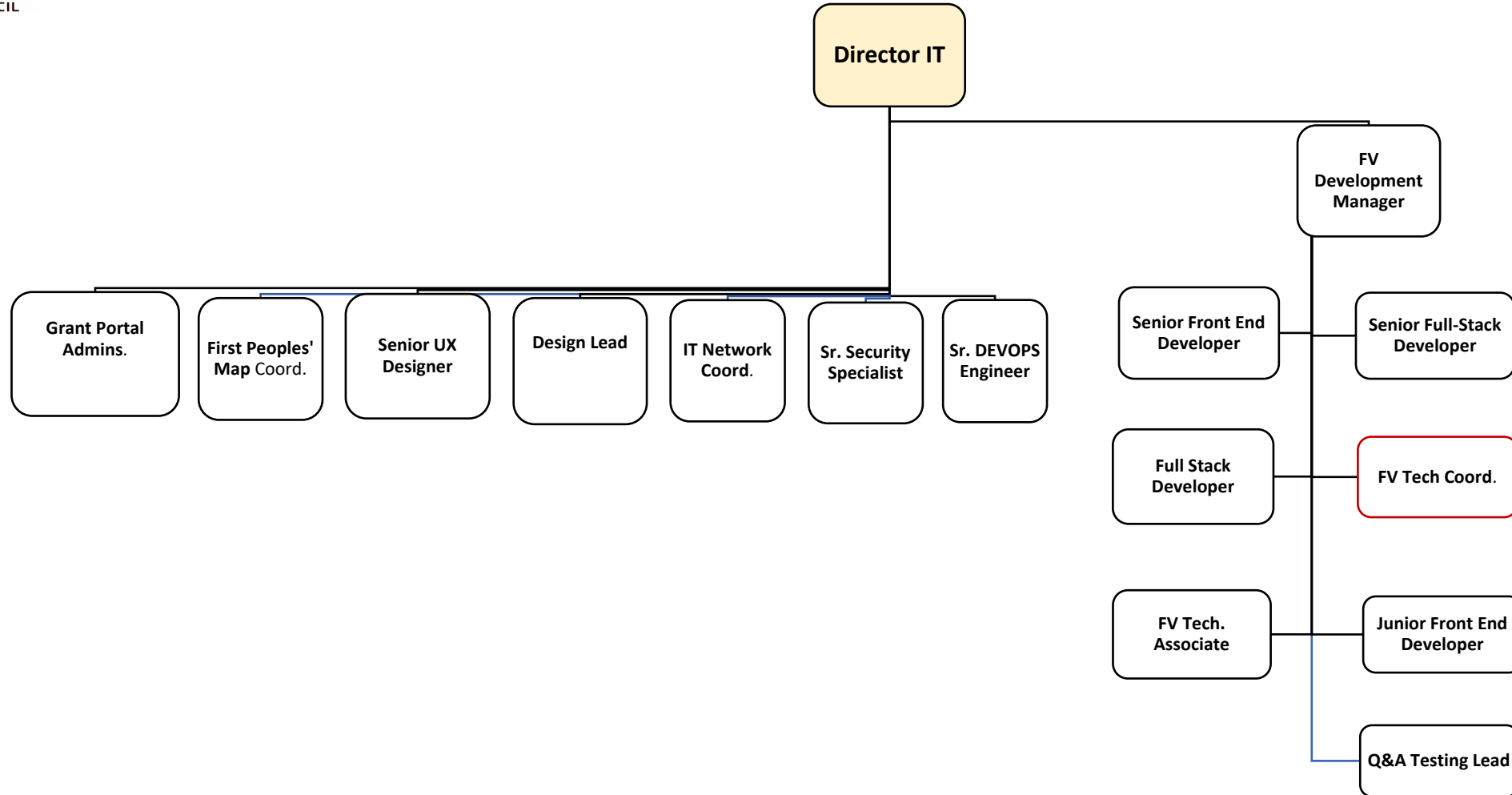
FIRST PEOPLES'
CULTURAL COUNCIL

Organizational Chart October 2023



Management





SCHEDULE "A"**STRATEGIC COMMUNICATIONS AND REPORTING SPECIALIST**
JOB DESCRIPTION**PURPOSE OF THE POSITION**

The Strategic Communications & Reporting Specialist (SCRS) works closely with the Chief Executive Officer (CEO) to provide strategic communications, research and reporting advice and support to advance the FPCC relationships with funders and government.

The SCRS leads the preparation of all planning, reporting, and supporting research related to strategic and governance reporting. This includes submissions to the Treasury Board, business case updating, reporting to the FPCC Board of Directors, and to the Advisory Board, and FPCC input on consultation initiatives, including legislation.

The SCRS reports directly to the CEO and works closely with the CEO's corporate department staff (executive team), program managers and the communications team. The SCRS is expected to operate within the confines of the FPCC vision, mandate, policies and standard operating procedures, and to ensure the foundational principles as outlined are incorporated into communications output and activities.

RESPONSIBILITIES**Strategic Communications**

- Acts as primary reporting contact for the CEO, including providing support to the CEO regarding content for speeches and presentations, preparation for meetings with government and reviewing CEO messages to FPCC staff.
- Works collaboratively with communications staff and government representatives to ensure accurate and consistent messaging in communications to government funders and the public.
- Supports CEO with issues management, including research and development of briefing notes and related materials.
- Works with the CEO to shape the CEO's strategic communications, including:
 - Political reporting to BC First Nations Leadership
 - Communications and reporting to the Board of Directors and the Advisory Board
 - CEO messaging to staff
- Conducts strategic communications research to understand the awareness and support for the FPCC mandate among stakeholders and all British Columbians. Based on findings, recommends new ways to engage with stakeholders and to advance FPCC's objectives.

Strategic Reporting and Consultation

- Primary liaison for FPCC interests with government staff, including monthly meetings with MIRR staff. Advises FPCC staff on government process to maximize funding opportunities and to minimize risks and barriers to the organization's mission.
- Leads Crown reporting to the provincial government and fulfills government information requests, including annual service plan report and multiple miscellaneous reports such as the poverty reduction report, MIRR Action Plan, Report on Multiculturalism and Path Forward Report; develops content, liaises with managers, staff and contractors to complete reports, manages relationships with government contacts, and coordinates FPCC /CEO review and feedback.
- Develops research and background materials and provides advice on approaching negotiations with funders and the development and implementation of MOU's.
- Develops operational planning and reporting to support the alignment with the long-term business case. Leads the updating of the FPCC Business Case and works with the Finance Department and managers to provide data to support investments in FPCC.
- Prepares and coordinates FPCC responses in support of various consultation initiatives, such as the DRIPA Action Plan and other matters, as required, by developing content, and coordinating the FPCC input, review and feedback processes.
- Develops background and supporting materials and responds to information requests from MIRR, including Treasury Board, about funding from the provincial government; leads reporting to the Treasury Board.
- Performs regular scans to track government initiatives that impact or overlap with the FPCC mandate, identifies priority opportunities for the CEO to consider implementing in response to the scans.

Governance

- Assists with research on policy issues and gathers information for the CEO and the Board. Supports the engagement of the Board and advisory team.
- Is familiar with, and supports reporting required by, level three crown corporations.
- Collaborates with the Communications Department to develop materials to address the Board's and Advisory Board's communications needs, and supports advocacy and engagement with stakeholders.
- Collaborates with the Communications Department to engage with the Board to explore and recommend new approaches to promote FPCC opportunities to reach a wider audience and to maximize the number of quality submissions.

- Collaborates with other members of the executive team to develop or update materials such as the board toolkit and the board manual and is responsible for managing regular reviews of governance materials.

Other Duties

- Works closely with the Communications team to support media relations, stakeholder engagement and raising the profile of FPCC.
- Shares communications knowledge and mentors members of the CEO's team, including the Executive Assistant (EA), to further develop communications skills. Supports the EA to develop skills in making presentations to managers on FPCC operations and processes, such as the scheduling calendar. Supports the EA to take on communications projects that are Board and manager related and to assist with research and analysis on policy decisions notes.
- Manages relationships with communications contractors as required.
- Other duties as required

SPECIFIC ACCOUNTABILITIES AND DELIVERABLES

Skills and Abilities

- 5+ years of experience in communications, public relations, or journalism in a busy, fast-paced environment.
- Advanced skills in developing communications and media relations plans and strategies
- Excellent organizational and project management skills, including attention to detail and a focus on milestones and deadlines.
- Advanced writing and editing skills, including drafting and editing articles, publications, reports and media materials. Polished oral communications skills.
- Understanding of governance support and strategy.
- Ability to work independently and as part of a team.
- Ability to take initiative with issues that arise, and to exercise the judgement required to ensure the CEO is kept updated on issues and events which will impact FPCC long-term.
- Ability to juggle multiple concurrent projects in a fast-paced environment.
- Demonstrated tact and judgment in interpersonal relationships. Ability to respond effectively and tactfully to sensitive issues, inquiries and complaints.
- Experience supporting and guiding staff would be an asset.

- Exceptional computer skills, including the MS Office Suite and savvy with the latest technology and tools needed to tell stories effectively to a broad audience.
- Ability to conduct background research on policy matters important to FPCC's stakeholders and funders.
- Experience with funding negotiation background support would be an asset.
- Ideally brings an Indigenous point of view to the development of materials that describe the work of FPCC and the value of Indigenous arts, heritage, languages and cultures.
- Understanding of government requirements and expectations of Crowns.
- Knowledge of and experience working with B.C. First Nations and Indigenous organizations and communities.

Education and Training

- Degree in communications, public relations or journalism is preferred.
- Familiarity with desktop publishing and design tools such as Adobe Creative Suite, Canva or other similar tools
- Combination of work experience and education also considered
- Excellent organizational and leadership skills
- Knowledge of MS Office, Word, Excel, MailChimp, and Meltwater.

Working Conditions

- Most work is done in a general office environment
- Travel to attend meetings, conferences, seminars may be required
- May be required to work occasional evenings and weekends

FINANCIAL RESPONSIBILITY

- Required to follow policies and procedures as outlined in the FPCC Employee Administration Policy Manual.

DIRECT SUPERVISION

0

TOOLS/EQUIPMENT

- Computer for word processing, electronic mail, spreadsheets, presentations, reports
Proficiency with the MS Office Suite including Word, Excel, Power Point, Outlook desktop publishing, design tools such as Adobe Creative Suite, Canva or other, and standard office equipment: facsimile, photocopiers, cell phone, audio visual equipment.

CERTIFICATION

I have read the contents of this job description and accept the position and responsibilities as described in this document.

Celia Sollows

Employee Name

Celia M Sollows

Signature

____November 10 2022____
Date



FIRST PEOPLES'
CULTURAL COUNCIL

SCHEDULE "A"

Manager People and Culture **JOB DESCRIPTION**

PURPOSE OF THE POSITION

Reporting to the Chief Executive Officer, the Manager of People & Culture (MP&C) serves as strategic partner, coach and leader at the managerial level within First Peoples' Cultural Council (FPCC). The position supports the growth, strategy, direction and culture of the FPCC through the development and delivery of human resources programs, activities and initiatives. The MP&C implements the HR operational plan, meets the targets of the Service Plan, and provides advice and assistance on the development and implementation of policies, and other human resources matters to the Chief Executive Officer (CEO), managers and staff. The MP&C operates within the confines of the FPCC vision, mandate, policies, standard operating procedures, and ensures the foundational principles are incorporated into human resources programs and policies.

RESPONSIBILITIES

HR Planning, Project Management and Administration

- Attends managers' and staff meetings and provides input/feedback on managerial level matters
- Maintains and updates all employee files, ensuring employee files are kept confidential in keeping with privacy and other legislation
- Administers salaries, including probationary and annual salary reviews including annual fair market assessment
- Develops HR annual budgets and work plans for consideration by the CEO
- Reviews program financial statements and monitors projects to ensure that revenues and expenses are within budget and communicates with the CEO and/or Finance Manager to resolve concerns
- Ensures outcomes are aligned with objectives and satisfies key financial and operational performance indicators

- Develops and maintains strong relationships with government contacts related to human resources programs, engages with the Crown Corporation Employers' Association regarding HR matters
- Engages, and develops strong relationships with external advisers and consultants, including lawyers and contractors

Employee/Manager Relations

- Develops and maintains strong relationships with managers and staff of FPCC
- Collaborates with other managers and staff to provide support and advice as needed
- Coaches and advises managers and staff on policies and procedures, and employee and performance issues
- Develops trends and metrics on employee satisfaction and morale, and provides related advice to the CEO and to managers

Recruiting

- Working with the relevant manager, screens and interviews candidates
- Hires, recruitment and retention of staff, trains, coaches, develops, and assesses performance of FPCC program staff
- Provides support in the selection of new recruits, including the determination of the salary and participating in salary negotiations
- Prepares employment contracts and letters of offer

Onboarding, Training and Performance Management

- Follows up with managers to ensure proper onboarding and training are provided
- Ensures probationary and periodic performance evaluations are conducted by managers
- Develops onboarding and training programs to develop employee skills. Prepares related cost estimates and determines budget requirements

- Tracks all completed performance evaluations

Occupational Health & Safety

- Ensures the FPCC Occupational Health and Safety (OHS) programs are compliant with relevant legislation
- Recommends and develops OHS programs and processes as required

Other Duties

- Performs other related duties as required.

SPECIFIC ACCOUNTABILITIES AND DELIVERABLES

Education and Training

A post-secondary degree or diploma with an HR focus, supplemented by at least four years' similar experience, preferably in an Indigenous organization, or an acceptable combination of equivalent education, training or experience in related fields. A CHRP designation would be an asset.

Skills and Abilities

- Strong working knowledge of B.C. Employment Standards and relevant labour legislation
- Demonstrated ability to coach/ mentor managers and staff to achieve desired results
- Fully versed with proven skills in the HR cycle
- High personal, professional and ethical standards
- Ability to maintain a high level of confidentiality
- A collaborative, proactive, and results oriented approach
- Strong cultural competencies and experience working in a culturally diverse organization
- Excellent communication and relationship building skills
- Excellent analytical and critical thinking/problem solving skills

- Strong consulting and coaching skills
- Experience with organizational change management
- Strong recruitment experience and knowledge
- Proven ability to be fiscally responsible and manage budgets as assigned
- Strong training and development knowledge and experience
- Experience with conflict resolution training
- Experience with change management
- Strong HR project management skills, experience, and ability to meet deadlines and expectations
- Ability to easily adapt as the situation demands, to meet strategic goals and objectives
- Excellent time management skills, the ability to prioritize work and the work of others
- Ability to plan in advance for significant tasks
- Experience working in government, First Nations and/or Crown corporations would be considered an asset
- Knowledge of and experience working with B.C. First Nations and Indigenous organizations and communities

Working Conditions (CUSTOMIZE)

Majority of work is done in office

Travel to attend meetings, conferences, seminars occasionally on short notice

May be required to work evenings and weekends

FINANCIAL RESPONSIBILITY

- Required to follow policies and procedures as outlined in the FPCC Employee Administration Policy Manual.

DIRECT SUPERVISION

No

TOOLS/EQUIPMENT (CUSTOMIZE)

- | |
|--|
| <ul style="list-style-type: none">• Computer for word processing, electronic mail, spreadsheets, presentations, reports• Proficiency with the MS Office Suite• Standard office equipment: facsimile, photocopiers, cell phone, audio visual equipment. |
|--|



SCHEDULE "A"

OFFICE MANAGER JOB DESCRIPTION

PURPOSE OF THE POSITION

The Office Manager provides direction and support to program management staff and is responsible for all office administration and procedures, to ensure organizational effectiveness, efficiency, and safety. The OM is responsible for streamlining administrative procedures, inventory control, coordinating all office administration functions, records management, facilities, and asset management, including leased assets.

The OM reports directly to the CEO and is a member of the Management Team. The OM is expected to operate within the confines of the FPCC vision, mandate, policies, standard operating procedures, and ensure the foundational principles as outlined are incorporated into programs and policies.

RESPONSIBILITIES

Administration

- Effectively manages and leads staff according to authorized personnel policies and procedures that conform to employment standards and regulations
- Responsible for managing office services by ensuring office operations and procedures are organized, correspondences are controlled, filing systems are designed, supply requisitions are reviewed and approved, and that clerical functions are properly assigned and monitored
- Records Management and establish a historical reference for the office by outlining procedures for protection, retention, record disposal, retrieval, and staff transfers
- Ensure filing systems are maintained and current
- Establish and monitor procedures for record-keeping
- Ensure security, integrity, and confidentiality of data
- Design and implement and oversee adherence of office policies and procedures
- Develop and maintain plans for office space needs
- Analyze and monitor internal processes
- Ensure FPCC is getting good value for money with goods and services we purchase (includes courier, supplies, postage, lease agreements etc)
- Implement procedural and policy changes to improve operational efficiency
- Prepare operational reports and schedules to ensure efficiency

Operations

- Point person for maintenance, mailing, shipping, supplies, equipment, bills, and errands
- Organize office operations and procedures
- Perform review and analysis of special projects and keep the management properly informed
- Identifies maintenance, repairs, and office space management issues
- Responsible for developing and implementing office policies by setting up procedures and standards to guide the operation of the office

- Ensure that results are measured against standards, and adjusting as necessary
- Responds to unanticipated events (fire, flood etc) and manages any remediation required.
- Works with Program Managers to provide overflow support to their programs as needed, hiring temporary staff and contractors as required
- Effectively manage temporary staff and contractors according to existing policies and procedures
- Attends managers and staff meetings and provides support, input and feedback as needed
- Collaborates with other managers and staff to provide support and input as needed
- Provides support and reports to the FPCC as required
- Represents FPCC at community events, conferences and meetings as required

Equipment and Assets

- Ensure office efficiency is maintained by carrying out planning and execution of equipment procurement, layouts, and office systems
- Coordinate with IT department on all office equipment, phones and keys/fobs
- Manage relationships with vendors, service providers, and landlord, ensuring that all items are invoiced and paid on time
- Manage contract and price negotiations with office vendors, service providers, and office lease
- Allocate available resources to enable successful task performance
- Participate actively in the planning and execution of company events
- Responsible for developing standards and promoting activities that enhance operational procedures

Financial

- Responsible for ensuring office financial objectives are met by preparing annual budget for the office, planning the expenditures, analyzing variances, and carrying out necessary corrections that may arise
- Reviews program financial statements and monitors projects to ensure that expenses are within budget and communicates with the CEO and/or Finance Manager to resolve concerns
- Forecasts, prepare estimates and determine budget requirements and ensure spending is maintained within these limits
- Develop annual budget and work plans associated with budgets for consideration by the CEO
- Oversees and maintains control over approved budgets and expenditures for assigned responsibility areas and major projects in accordance with FPCC financial controls and administrative procedures
- Required to follow policies and procedures as outlined in the Finance Policy and Procedure Manual
- Has a strong business acumen and financial literacy and ability to understand processes related to reporting, budgeting, and forecasting

SPECIFIC ACCOUNTABILITIES AND DELIVERABLES

Skills and Abilities

- 3+ years of solid office administrator experience in a busy, fast paced office
- Experience with paperless file management would be an asset
- Outstanding communication and interpersonal abilities
- Highly organized and detail oriented
- Excellent interpersonal, and oral and written communications skills with ability to build successful working relationships
- Critical thinking and problem solving skills
- Flexible and able to multi-task in a changing environment
- The ability to be a self-starter and work independently
- Strong skill set with Microsoft Office: Word, Excel and Outlook
- Experience working with accounting systems or databases is an asset
- Experience managing staff and contractors would be an asset
- Ability to easily adapt as the situation demands, to meet strategic goals and objectives;
- Proven ability to be fiscally responsible and manage budgets as assigned
- Knowledge of, and experience working with, BC First Nations and Indigenous communities would be an asset

Education and Training

- Diploma/BSc/BA in office administration or relevant field is preferred
- Familiarity with office management procedures and basic accounting principles
- Combination of work experience and education also considered
- Excellent organizational and leadership skills
- Knowledge of MS Office, Word, Excel, etc.

Working Conditions

- Most work is done in a general office environment
- Travel to attend meetings, conferences, seminars may be required
- May be required to work occasional evenings and weekends

FINANCIAL RESPONSIBILITY

- Required to follow policies and procedures as outlined in the Employee Admin Manual and Managers' Manual

DIRECT SUPERVISION

1

TOOLS/EQUIPMENT

- Computer for word processing, electronic mail, spreadsheets, presentations, reports
- Proficiency with the MS Office Suite including Word, Excel, Power Point, Outlook and Standard office equipment: facsimile, photocopiers, cell phone, audio visual equipment



FIRST PEOPLES'
CULTURAL COUNCIL

FPCC Public Interest Disclosure Policy

Date: November 30, 2022

1. Purpose

FPCC is committed to maintaining high ethical standards and legitimate business practices and wishes to encourage the identification and prevention of any wrongdoing that may affect this commitment.

The purpose of this policy is:

- a) to provide employees with a process whereby employees may disclose any knowledge of actual or intended wrongdoing which may be unethical, illegal or fraudulent; and

if required, refuse to carry out any order or direction which is illegal or unethical and which is given by an individual who has direct or indirect control over the employee's employment and;
- b) to advise employees who provide such disclosures, and are acting in good faith, and on the basis or reasonable belief, with protection from any form of retaliation or threat of retaliation when they do provide such disclosure; and
- c) to meet FPCCs' responsibilities under the *Public Interest Disclosure Act of British Columbia (PIDA)*

2. Scope

This policy applies to all employees and former employees of FPCC.

This policy does not apply to complaints or issues related to employment, respect in the workplace or safety issues. Such issues should be handled through the employee's Manager, People and Culture Manager or Joint Occupational Health & Safety (JOHS) Committee and be dealt with under other policies.

3. Definitions

"Act" or "PIDA" the *Public Interest Disclosure Act*

"Wrongdoing" wrongdoing as defined in section 7(1) of the Act

“Designated Officer” means the Director of Finance and the People and Culture Manager

“CEO” the most Chief Operating Officer an employee as set out in FPCC organizational chart.

“Employee” any current or former employee of FPCC.

“Discloser” an employee or former employee of the **FPCC** who makes a disclosure of wrongdoing or seeks advice about making a disclosure under the Act

“Disclosure” a disclosure made by a discloser in accordance with the Act

“Public Body” a ministry, office or government body as defined in the Act

“Reprisal” reprisal as defined in section 31(1) of the Act

“Respondent” a person alleged or found to have committed wrongdoing

“Lawful authority” any policy or law enforcement agency with respect to an offence within its power to investigate;

or

Any person whose duties include the enforcement of provincial or federal law within their power to investigate.

“Manager” for each employee the person to whom they report on the FPCC organizational chart.

4. Responsibilities

4.1 Employee

- An employee, acting in good faith and on the basis of reasonable belief, has a duty to report actual, suspected or potential incidents of wrongdoing and to co-operate with any investigation by the Designated Officer, their Manager, the CEO, or lawful authorities into such allegations.
- To protect the reputation of colleagues with respect to unproven allegations an employee is responsible for maintaining confidentiality while the Designated Officer or Ombudsperson addresses their disclosure except where required by law, or where an employee's safety or public safety is imminently threatened.

- The employee is not expected to prove the truth of an allegation; however, the employee should be able to demonstrate to the Designated Officer that the report is being made in good faith.

4.2 Managers

- Receiving any disclosures of wrongdoing from employees or clients in confidence, and for immediately forwarding such reports to the Designated Officer.
- Co-operating with an investigation into misconduct; and fostering a work environment which encourages open communication, ethical behaviour, adherence to laws and adherence to FPCC policy.

4.3 Designated Officer

Providing guidance

- Providing advice about the *PIDA* and this policy
- Directing employees to additional resources and options for making a disclosure.

Receiving disclosures and mitigating risk of reprisal

- Receiving disclosures of wrongdoing, alleged wrongdoing or anticipated wrongdoing in confidence.
- Reviewing the disclosure form or providing assistance with completing the form where a barrier exists to the employee in doing so independently
- Mitigating reprisal risk by protecting the identity of the employee who made the disclosure.

Acting on Disclosures and Communicating Outcomes

- Following the procedures in this policy and as outlined in *PIDA*
- Communicating outcomes as prescribed in the *PIDA*

4.4 CEO

The CEO is responsible for:

- Ensuring Information about PIDA is available to employees, and procedures clearly outline how to request advice or make a disclosure or a complaint about reprisal under *PIDA*
- Notifying the Board of findings of wrongdoing and subsequent recommendations.
- Notifying appropriate lawful authorities as required.

5. Procedures

5.1 Requests for Advice

5.1.1 An employee who is considering making a disclosure under PIDA may seek advice about doing so from:

- (a) a lawyer;
- (b) their manager;
- (c) a Designated Officer; or
- (d) the Ombudsperson.

5.1.2 The Manager or Designated Officer may require the employee to make the request for advice in writing.

5.1.3 Managers and Designated Officers will document all requests for advice received under PIDA, and maintain a written record of the advice provided.

5.1.4 Managers and Designated Officers are to clarify that a request for advice is being made under PIDA in cases where there is ambiguity.

5.1.5 Employees may wish to specify that they are requesting advice under PIDA.

5.1.6 Employees who seek advice from the people set out above are protected from reprisal under PIDA. No person can adversely affect

a person's employment or working conditions because the employee sought advice about making a disclosure.

- 5.1.7 This protection applies whether or not the employee decides to make a disclosure.

5.2 Making a Disclosure

- 5.2.1 Employees can report allegations of wrongdoing under PIDA by making a disclosure to their Manager, Designated Officer or the Ombudsperson. Allegations made to other persons are not covered by PIDA.

- 5.2.2 Employees can make disclosures of wrongdoing as defined in section 7(1) of PIDA:

This Act applies to the following wrongdoings in or relating to FPCC, including wrongdoings that occurred before the coming into force of this Act:

- (a) a **serious act or omission** that, if proven, would constitute an offence under an enactment of British Columbia or Canada;
 - (b) an act or omission that creates a **substantial and specific danger** to the life, health or safety of persons, or to the environment, other than a danger that is inherent in the performance of an employee's duties or functions;
 - (c) a **serious misuse** of public funds or public assets;
 - (d) **gross or systemic mismanagement**;
 - (e) knowingly **directing or counselling a person to commit a wrongdoing**.
- 5.2.3 Employees can make disclosures, in good faith, about wrongdoings that they reasonably believe have occurred or are about to occur. Employees can make disclosures about wrongdoings that occurred before PIDA was in force, as long as the wrongdoing occurred or the employee learned of the wrongdoing during their employment.
- 5.2.4 If an employee makes a disclosure to their manager, the manager must forward it to a Designated Officer as soon as possible. If a Designated Officer is the subject of the allegations, the manager will

forward the disclosure to the other Designated Officer. If an alternative Designated Officer is not available, the manager may suggest the disclosure be submitted to the Ombudsperson.

5.2.5 Employees who wish to make a disclosure must do so in writing by completing the **Disclosure Form**. Disclosures must include the following information, if known:

- (a) A description of the wrongdoing;
- (b) The name(s) of the person alleged
 - (i) to have committed the wrongdoing, or
 - (ii) to be about to commit the wrongdoing;
- (c) the date(s) of the wrongdoing;
- (d) whether the information or conduct that is being disclosed relates to an obligation under another enactment and, if so, a reference to the enactment;
- (e) whether the wrongdoing has already been disclosed under PIDA or another enactment;
- (f) if paragraph (e) applies, the name of the person to whom the disclosure was made and the response, if any, that has been received.

5.2.6 Employees can also make disclosures to their Manager or a Designated Officer by email or mail. Employees are encouraged to note that they are making a public interest disclosure and to ensure that their disclosure includes the required information.

5.2.7 If an initial disclosure is not made in writing, the Designated Officer will assist the employee to document their disclosure using the **Disclosure Form**.

5.3 Anonymous Disclosures

5.3.1 Employees who wish to make a disclosure may do so anonymously. However, an anonymous disclosure cannot be considered if the Designated Officer cannot determine whether the discloser is an employee or former employee of **FPCC**.

- 5.3.2 A Designated Officer will consider anonymous disclosures only where there is a reasonable basis to believe the discloser is an employee or former employee.
- 5.3.3 Anonymous disclosers should ensure that they have provided adequate particulars about the allegations to allow the Designated Officer to assess whether the allegations warrant investigation under PIDA. Anonymous disclosers should consider providing contact information so that the Designated Officer can follow up to obtain more information about the disclosure as needed.
- 5.3.4 Employees are encouraged to bring forward their disclosures and to identify themselves in doing so. Designated Officers will provide anonymous disclosers with the following information:
- They will only share the discloser's identity with their express permission or for a lawful purpose
 - Making an anonymous disclosure does not mean that their employer or colleagues will not suspect who made the disclosure
 - PIDA provides protection from reprisal for disclosers, and the **CEO** does not tolerate retaliation against disclosers
 - Without knowing the identity of the discloser, the Designated Officer cannot conduct a reprisal risk assessment or take measures to mitigate any risk of reprisal to the employee
 - If the anonymous discloser does not provide their contact information, the Designated Officer may not have sufficient information to assess their disclosure
 - Anonymous disclosers may not receive information about the conduct of any investigation into the disclosure, including notice of the investigation and a summary of the results
- 5.3.5 If the Designated Officer is unable to establish that an employee made the disclosure, the Designated Officer will close the file.

5.4 Multiple Disclosers

- 5.4.1 If multiple disclosers come forward at the same time regarding the same alleged wrongdoing, the Designated Officer may assess and investigate the disclosures together as a single matter.

- 5.4.2 The fact that multiple disclosers have come forward about the same alleged wrongdoing will not be shared with the other disclosers. Each discloser will have protections from reprisal under PIDA and will be interviewed separately.

5.5 Public Disclosures

- 5.5.1 Section 16 of PIDA provides that an employee may make a public disclosure where they “reasonably believe that a matter constitutes an imminent risk of a substantial and specific danger to the life, health or safety of persons, or to the environment.” An employee must take the following steps prior to making an urgent public disclosure:
- (a) Consult the relevant protection official, as follows:
 - In respect of a health-related matter, the Provincial Health Officer
 - In respect of an environmental matter, Emergency Management BC
 - In any other case, the appropriate police force;
 - (b) Receive direction from the protection official about whether to make the disclosure, and if so, on what conditions; and
 - (c) Where the protection official approves the disclosure, make the disclosure in accordance with any conditions the protection official imposes.
- 5.5.2 There are a number of limits on the kind of information that an employee can share when making a public disclosure. Employees must not share information that is subject to a restriction under an enactment of BC or Canada. This means employees must not share information that they are prohibited from sharing under a statutory oath or any statute or other regulation.
- 5.5.3 In addition, PIDA does not authorize the release of information in a public disclosure that is:
- Protected by solicitor-client privilege
 - Protected by any common law rule of privilege, or
 - Subject to public interest immunity, including cabinet privilege

- 5.5.4 If the protection official directs the employee not to make the disclosure public, the employee must not make it public. The protections for employees in PIDA may not apply to employees who do not follow the protection official's advice.
- 5.5.5 Immediately after making the disclosure public, the employee must advise their Manager or Designated Officer about the public disclosure and then make the disclosure to their manager, Designated Officer or the Ombudsperson.
- 5.5.6 If the Designated Officer investigates a disclosure following a public disclosure, they will contact the protection official to gather information regarding the steps that the protection official has taken in response to the subject matter of the disclosure. The Designated Officer will consider the information obtained when assessing whether further investigation is warranted.

5.6 Reprisal

- 5.6.1 Reprisal is prohibited under PIDA. Reprisal is defined in section 31(1) of PIDA as follows:

31 (1) A person must not take any of the following measures of reprisal against an employee, or counsel or direct that any of the following measures of reprisal be taken against an employee, by reason that the employee has, in good faith, sought advice about making a disclosure, made a disclosure or cooperated with an investigation under this Act:

- (a) a disciplinary measure;
- (b) a demotion;
- (c) a termination of employment;
- (d) any measure that adversely affects the employee's employment or working conditions;
- (e) a threat to take any of the measures referred to in paragraphs (a) to (d).

- 5.6.2 Employees are protected from reprisal when they do any of the following acts:

- (a) Seek advice about making a disclosure
- (b) Make a disclosure
- (c) Cooperate with a PIDA investigation
(collectively, "Protected Acts")

- 5.6.3 Employees are protected from any person taking an adverse measure against them which impacts their employment because they did a Protected Act under PIDA. An adverse measure can include termination, suspension and demotion, as well as subtler measures like bullying, ostracizing or a workplace transfer.
- 5.6.4 No person can take a reprisal against an employee, including managers, co-workers, senior executive or alleged wrongdoers.
- 5.6.5 The Ombudsperson is responsible for investigating complaints of reprisal from public bodies under PIDA's jurisdiction. If an employee believes that a reprisal has been taken against them, they may contact the Ombudsperson's office to make a complaint.

5.7 Assessment Procedures

- 5.7.1 The Designated Officer is responsible for receiving disclosures and assessing whether they are made by an employee and meet the threshold for wrongdoing.
- 5.7.2 The Designated Officer will conduct this initial assessment prior to determining whether an investigation is warranted.

Initial Interview

- 5.7.3 The Designated Officer will confirm receipt of a disclosure to an employee within 2 business days of receipt. The Designated Officer will conduct an initial interview with a discloser as soon as possible after receipt of a disclosure. The interview, and any subsequent interviews, will be conducted in a manner and place that maintains the confidentiality of the identity of the discloser.
- 5.7.4 The purpose of the interview is to gather more information about the nature of the disclosure and to assess whether it meets the threshold for wrongdoing. The interview is also intended to inform the Designated Officer's assessment of the urgency of the matter, as well as an initial consideration of any risk of reprisal to the discloser.

Risk Assessments

- 5.7.5 The Designated Officer is responsible for conducting two types of risk assessments: an urgency assessment and a reprisal risk assessment. Both assessments will be conducted as soon as practicable. The assessments are then conducted throughout the life of a file, but in particular, as new information is received indicating the presence of a risk or when the file moves to a new phase (from assessment, to investigation, to reporting).

Urgency Assessment

- 5.7.6 The Designated Officer will assess whether the disclosure raises a matter which requires an urgent response. Urgent responses may be required where the subject matter of the disclosure indicates a serious risk to life, public health or safety, or the environment. This includes disclosures made following an urgent public disclosure unless information indicates that any serious risk has already been addressed. An urgent response may also be required where:

- The alleged wrongdoing has not occurred and there is an opportunity to intervene before it occurs
- There is a high risk that evidence will be lost or destroyed
- There is an imminent risk of significant financial harm
- There is a high risk of reprisal for the discloser

- 5.7.7 Where a matter poses a risk of significant harm to the environment or the health or safety of persons, the Designated Officer will consider whether the public interest reporting provision in section 25 of the *Freedom of Information and Protection of Privacy Act* may be applicable. Where the Designated Officer believes section 25 may apply, the Designated Officer will consult the **CEO**.

Reprisal Risk Assessment

- 5.7.8 Employees are protected from reprisal under PIDA for making a disclosure, requesting advice about making a disclosure or cooperating with a PIDA investigation.
- 5.7.9 The Designated Officer must conduct a reprisal risk assessment when they receive a disclosure. The reprisal risk assessment is intended to ensure any risks of reprisal are identified and managed to the extent possible.
- 5.7.10 The Designated Officer will use the **currently available tools from the ombudsperson** for more information about when and how to assess the risk of reprisal and how to manage that risk.

Gathering Information

- 5.7.11 The Designated Officer is responsible for reviewing the employee's disclosure form or other written submission to ensure it meets the content requirements in section 15 of PIDA.
- 5.7.12 If the content requirements are not met, the Designated Officer will identify the information that is outstanding and ask the discloser to provide that additional information, if known.
- 5.7.13 If the employee makes their disclosure verbally, the Designated Officer will require the employee to follow-up with a written disclosure, as described in paragraph 15, above.

Assessing the Disclosure

- 5.7.14 The Designated Officer will assess the disclosure to confirm the following:
 - a. the discloser is an employee or former employee of the **FPCC**;
 - b. the alleged wrongdoing occurred in or relating to a public body;
 - c. the allegations meet the threshold of wrongdoing for at least one of sections 7(1)(a) to (e); and
 - d. the disclosure is in writing and contents of the disclosure meet the requirements of section 15.

- 5.7.15 In determining whether the allegations meet the threshold for wrongdoing, the Designated Officer should consult **Practice Directive: Interpreting Wrongdoing**, which sets out the test and considerations for each type of wrongdoing.
- 5.7.16 If the Designated Officer determines that the allegations, if proven, would meet the threshold of wrongdoing, the Designated Officer will also consider whether there is a reasonable basis to support an investigation. The Designated Officer will assess whether the discloser has provided some evidence that could support a conclusion that the alleged wrongdoing occurred. Mere speculation on the part of the discloser without any evidentiary support does not suffice.

Deciding Whether to Investigate

- 5.7.17 Once the assessment of a disclosure is complete, the Designated Officer must determine whether or not to investigate. The Designated Officer will decide whether to investigate within 30 days of receipt of the disclosure.
- 5.7.18 If the Designated Officer concludes that the assessment will require more than 30 days, they will notify the CEO of the delay, reasons for the delay, and the expected date on which the assessment will be complete and a decision made.

No Investigation

- 5.7.19 If the disclosure is not made by an employee or former employee, or if the wrongdoing alleged does not relate to a public body, the Designated Officer must refuse to investigate under PIDA.
- 5.7.20 If the disclosure does not meet the threshold for wrongdoing under section 7, or there is no reasonable basis to support an investigation, the Designated Officer must refuse to investigate under PIDA.

- 5.7.21 Where the disclosure meets the assessment criteria, the Designated Officer must consider whether they are prohibited from investigating under PIDA.
- 5.7.22 The Designated Officer is prohibited from investigating if the disclosure relates primarily to:
- (a) a dispute between an employee and the **FPCC** respecting their employment;
 - (b) a matter relating to law enforcement;
 - (c) a matter relating to the prosecution of an offence; or
 - (d) an adjudicative function of a court, tribunal or other statutory decision maker, including a decision, or the processes or deliberations that have led to or may lead to a decision, by the court, tribunal or other statutory decision maker.

If any of the above circumstances apply, the Designated Officer must not investigate the disclosure.

- 5.7.23 If the Designated Officer determines they are not prohibited from investigating, they will consider whether they should exercise their discretion to refuse to investigate applying the following discretionary considerations:
- (a) The disclosure does not provide sufficient details or particulars about the wrongdoing;
 - (b) The disclosure is frivolous or vexatious;
 - (c) The disclosure was not made in good faith;
 - (d) The investigation of the disclosure would serve no useful purpose or could not be reasonably conducted because the length of time that has passed between the date of when the subject matter of the disclosure arose and the date of the disclosure.
 - (e) The disclosure relates solely to a public policy decision;
 - (f) The disclosure has been referred to another appropriate authority for investigation; or
 - (g) The disclosure has already been or is being appropriately investigated.

- 5.7.24 The Designated Officer may seek additional sources of information to assist in determining whether or not an investigation is appropriate.
- 5.7.25 The Designated Officer will notify the discloser of a decision not to investigate the disclosure, and will provide reasons for their decision in writing.
- 5.7.26 Where the Designated Officer decides not to investigate, the Designated Officer will consider whether there are other mechanisms available for addressing the discloser's concerns, and provide that information to the discloser as appropriate.

Referral to the Ombudsperson

- 5.7.27 Where the Designated Officer determines that the disclosure is eligible for investigation under PIDA, the Designated Officer will consider whether the disclosure, in whole or in part, would be more appropriately investigated by the Ombudsperson. In assessing whether to refer a disclosure to the Ombudsperson, the Designated Officer will consider:
- the level and position of the alleged wrongdoer(s)
 - potential conflicts of interest or perceptions of conflict
 - the likelihood of voluntary compliance of witnesses
 - whether the disclosure involves sensitive political or social issues
 - implications to the public interest
 - the risk of reprisal to the discloser
 - any other relevant factors that arise on the facts of the case
- 5.7.28 The Designated Officer will consult with the **CEO** prior to referring a disclosure to the Ombudsperson, and make the referral at the direction of the CEO, unless the disclosure is about the CEO.
- 5.7.29 The Designated Officer will always refer disclosures involving the CEO to the Ombudsperson.
- 5.7.30 The Designated Officer will inform the discloser in writing of a referral to the Ombudsperson.

Report to Law Enforcement

- 5.7.31 The Designated Officer may report an alleged offence relating to a request for advice, a disclosure or a reprisal complaint under the Act to a law enforcement agency if they have reason to believe an offence may have been committed. The offence may be reported regardless of whether the disclosure is determined to meet the threshold for wrongdoing or whether the Designated Officer decides to investigate the allegations. In assessing whether to make a report, the Designated Officer will consider the seriousness of the allegations and whether the alleged offence may be a criminal offence.
- 5.7.32 The victim of any alleged offence will be consulted prior to a report being made, unless consultation poses health and/or safety concerns. Designated Officers may also wish to consider concerns about reporting to law enforcement in cases where persons involved belong to communities or groups that have historically been overpoliced.
- 5.7.33 The Designated Officer will not report an offence without first consulting the **CEO**, unless the **CEO** is implicated in the alleged offence.
- 5.7.34 The Designated Officer will provide no more information to law enforcement than is necessary to make the report.

Postponing or Suspending an Investigation

- 5.7.35 The Designated Officer may postpone or suspend an investigation if they:
- (a) report an alleged offence to law enforcement prior to, or during an investigation;
 - (b) consider that investigation may compromise another investigation; or
 - (c) become aware that the alleged wrongdoing being investigated is also being investigated in the prosecution of an offence.

- 5.7.36 The Designated Officer must consult with the **CEO** prior to postponing or suspending an investigation, unless the **CEO** is implicated in the wrongdoing.
- 5.7.37 The discloser must be notified of the decision to postpone or suspend an investigation, unless the Designated Officer considers that the notification would compromise another investigation.

5.8 Investigation Procedures

- 5.8.1 If the Designated Officer decides a disclosure warrants investigation under PIDA, the Designated Officer must investigate in accordance with these procedures, and in accordance with the principles of procedural fairness and natural justice.

Notifying Parties

5.8.2 Notice to Discloser

The Designated Officer must notify the discloser of the decision to investigate. The notification may be brief and may be provided orally or in writing. The notification will include the scope of the investigation. If only part of the disclosure will be investigated, the Designated Officer will provide the discloser reasons for their decision not to investigate the remaining portions of the disclosure.

5.8.3 Notice to CEO

Generally, the Designated Officer will provide notice to the **CEO** of the decision to investigate. Notice may be delayed until an appropriate time if the Designated Officer considers that notification may compromise the investigation or expose the discloser to reprisal.

If the **CEO** is alleged to be responsible for the wrongdoing, the Designated Officer will notify the chair of the board of directors, or an executive officer or a person occupying a comparable position with respect to **FPCC**, and the minister responsible, if applicable.

5.8.4 Notice to Respondents

The Designated Officer will notify any respondents that their conduct is the subject of an investigation at an appropriate time, taking into account the need to protect the integrity of the

investigation and the respondents' rights to procedural fairness. Respondents will in all cases receive notice of the allegations prior to being interviewed.

Requiring Another Body to Suspend or Postpone an Investigation

- 5.8.5 PIDA does not limit the authority of a public body to undertake other investigations while a Designated Officer investigates a disclosure of wrongdoing. However, where there is *prima facie* evidence that a public body undertook an investigation in order to compromise an investigation of a disclosure under PIDA, the Designated Officer may require the public body to suspend or postpone its investigation.
- 5.8.6 The Designated Officer will not suspend or postpone another investigation without first consulting the CEO, except in circumstances where the CEO is implicated in the wrongdoing.

Maintaining Confidentiality

- 5.8.7 Designated Officers and managers may collect, use and disclose personal information for the purpose of PIDA where the personal information is included in a disclosure or is for the purpose of an investigation or report.
- 5.8.8 Information about the identity of the discloser is confidential. No person may share personal information about a discloser that could enable the identification of the discloser as the person who made the disclosure, unless
- a) The provision or use of the information is for the purposes of the Act, including as necessary to effectively manage the disclosure in accordance with PIDA and the principles of natural justice and procedural fairness;
 - b) The provision or use of the information is in connection with another lawful purpose;
 - c) The discloser has given express consent, in writing, to the release or use of the personal information; or
 - d) The personal information has previously been lawfully published.

- 5.8.9 Where necessary to effectively carry out an investigation, a Designated Officer may share that the employee who made the disclosure was a witness and a source of evidence. Wherever possible, the Designated Officer will not share or confirm that the employee made the disclosure.
- 5.8.10 The Designated Officer will explain the confidentiality provisions in the Act to the discloser.
- 5.8.11 Information and documents obtained in the disclosure process will be stored in a safe and secure manner and must be protected from unauthorized access, use and disclosure.

Obtaining Documentary and Written Evidence

- 5.8.12 The Designated Officer will seek to obtain information in the order, format and fashion that they determine is most appropriate and effective. They may contact whomever is most appropriate to obtain records related to the allegations.

Conducting Interviews

General

- 5.8.13 Interviews of disclosers, respondents and witnesses will be conducted in the order and format (i.e. in-person, telephone or video) appropriate for the circumstances. Efforts should be made to accommodate the individual's preferences and accessibility needs.
- 5.8.14 Interviewees will be provided notice of an interview date, time and place along with the general nature of the interview. Interviews may be held outside the workplace as necessary to maintain confidentiality and the integrity of the investigation.
- 5.8.15 In some cases, it may be necessary for the Designated Officer to provide the interviewee with copies of documents in advance of the interview, including where doing so will enhance the effectiveness of the interview and/or to accommodate the interviewee's needs.
- 5.8.16 The Designated Officer will remind each witness of the prohibition in section 6(3) of PIDA and explain the prohibition against reprisal in section 31(1) of PIDA.

Respondent Interviews

5.8.17 Respondents are afforded a high level of procedural fairness. They must be provided notice that they are under investigation and the opportunity to respond to the allegations against them. If documents will be discussed in an interview with a respondent, the Designated Officer will consider providing advance opportunity for the respondent to review the documents unless they have reason to believe that doing so could compromise the investigation.

5.8.18 If, during an interview of a witness, the Designated Officer receives information that raises concerns that the witness may be implicated in a wrongdoing, they must stop the interview and inform the person of this concern. The person will then be treated as a respondent and provided the same level of procedural fairness provided to all respondents. The interview will be rescheduled to allow sufficient time for the person to prepare for the interview and seek advice should they choose.

Investigating Other Wrongdoings

5.8.19 If, during an investigation, the Designated Officer reasonably believes that another wrongdoing has been committed, the Designated Officer may investigate that wrongdoing. The same policies and procedures that apply to disclosures, with necessary modifications, will apply to other potential wrongdoings identified during the course of an investigation.

Discontinuing an Investigation

5.8.20 At any time after an investigation has commenced, the Designated Officer may discontinue an investigation for the reasons set out in paragraphs 55-56 above. If the Designated Officer decides not to complete an investigation after it has begun, the discloser must be notified of the decision to discontinue the investigation. Notice will be provided in writing, setting out the reasons for discontinuing the investigation.

Timelines

5.8.21 Investigations will be completed and a draft report prepared within four months from the decision to investigate. If the Designated Officer concludes that the investigation will require more than four months to complete, they must notify the CEO of the delay, reasons for the delay, and the expected date on which the investigation will be completed.

5.9 Reporting Procedures

Draft Investigation Report

- 5.9.1 Upon conclusion of gathering, reviewing and analyzing evidence, the Designated Officer will prepare a draft investigation report. The report will include the allegations, applicable laws and policies, evidence, analysis, findings and any recommendations to address findings of wrongdoing, as applicable.
- 5.9.2 Recommendations may be developed through a consultative process between the Designated Officer and the **CEO**.

Draft Report to Person(s) Adversely Affected

- 5.9.3 In accordance with the principles of procedural fairness, the Designated Officer will provide all those who may be adversely affected by any findings or recommendations in the investigation report with the opportunity to make representations before it is finalized. Representations may be provided orally or in writing.
- 5.9.4 Generally, the CEO, any respondents and other individuals who may be adversely impacted by the investigation report will be provided the opportunity to make representations. The Designated Officer may provide a copy of the draft report, excerpts of the report, or a summary of evidence and findings as the context requires.
- 5.9.5 The Designated Officer will review and consider all representations received before finalizing the investigation report.

Final Reports

- 5.9.6 The final investigation report will be provided to the **CEO**, unless the **CEO** is implicated in founded wrongdoing. If the **CEO** is implicated in founded wrongdoing, the report will be provided to the chair of the board of directors, an executive officer or a person occupying a comparable position with respect to **FPCC**.
- 5.9.7 The final investigation report must include
 - (a) the findings;
 - (b) the reasons to support the findings; and
 - (c) any recommendations.

- 5.9.8 The **CEO** will consider the findings and recommendations and take corrective measures to remedy the wrongdoing and any other deficiencies identified in the report. Where the **CEO** declines to take corrective measures, they will set out the reasons for declining to do so in the annual report.
- 5.9.9 The Designated Officer will provide a summary of the investigation report to the discloser. Where practicable, the Designated Officer will also provide a summary of the report to any person alleged or found to be responsible for wrongdoing. The kind of information and level of detail contained in the summary will be decided by the Designated Officer in consultation with the **CEO**, on a case-by-case basis.

Annual Reporting

- 5.9.10 The CEO, or delegate, will report annually on all disclosures of wrongdoing received and investigated with respect to **FPCC**. The annual report must include
- (a) the number of disclosures received, including referrals of disclosures, and the number acted on and not acted on;
 - (b) the number of investigations commenced as a result of a disclosure;
 - (c) in the case of an investigation that results in a finding of wrongdoing,
 - (i) a description of the wrongdoing,
 - (ii) any recommendations, including those made by the Ombudsperson, and
 - (iii) any corrective action taken in relation to the wrongdoing or the reasons why no corrective action was taken;
 - (d) any other information prescribed by regulation.
- 5.9.11 The annual report must not include any information that would
- (a) identify the discloser;
 - (b) identify a respondent; or
 - (c) unreasonably invade a person's privacy.
- 5.9.12 The annual report will be made publicly available on the **FPCC's** website.

Appendices

A. Disclosure of Wrongdoing Form

DATE	TRAINING TITLE	STAFF COMPLETION RATE	DETAILS
1-Sep-23	Smishing - Death Smish	83%	A hack known as “Blueleaks” recently exposed an enormous amount of highly sensitive law enforcement data. Robert Davi (as Frank) stars in this episode as he regretfully noti
1-Sep-23	Cybersecurity - Return to Office	83%	Most organizations are resuming office based operations after a prolonged period of experimentation with remote work brought about by the COVID-19 pandemic. This course helps learners prioritize cybersecurity as their team navigates their return to office based operations
5-Dec-23	Cybersecurity - Avoiding Phishing At	72%	Every networked device we carry and use each day is a potential entry point for scammers to access sensitive information. In today's digitally connected environment it's critical to be aware of methods scammers use, and ways to protect both yourself and your organization's data. This short course covers the di
5-Dec-23	Malware - Understanding Malware	72%	There are many types of malware. And in a connected world, ransomware has become a pervasive threat. In this course you will learn about the modern malware threat and you'll walk away with some actionable tips for staying safe online. The course provides you with a quick quiz to test your new knowledge.
1-Mar-24	Cybersecurity - Proper Use of E-mai	73%	E-mail is the most common form of business communication today, yet it's also the easiest way hackers gain access and compromise company systems and networks. This course covers key best practices for safe e-mail use, so that you can mitigate, rather than introduce, security risks to your company's assets.
1-Mar-24	Social Networking - Professional Be	73%	Social media provides new and exciting ways for individuals to interact with the world, but it adds a new dynamic to how others may view you and those connected to you – including your employer. This course covers key best practices for safe social networking use, including considerations to make to ensure no negative impacts to your reputation, or that of your employer, through your social media activities.
3-Jun-24	Cybersecurity - Proper Use of the In	79%	ether it's browsing on your mobile device at lunch or performing work related tasks online, you most likely spend at least some of your workday on the Internet. This course covers key best practices for properly using the Internet at work to help keep both you and your company secure and productive.
3-Jun-24	Business Ethics	79%	In today's business environment, companies are under intense scrutiny in the media, by investors, and by customers over the way they operate. People prefer to do business with companies and individuals that share their values, and avoid business that they feel are unethical, secretive, or corrupt. Organizations and their employees who hold themselves to high ethical standards often reap the rewards of fair and honest business practices, both financially and in terms of public opinion.
DATE	MICROSOFT TRAININGS	ATTENDANCE	DETAILS

28-Feb-24	SharePoint Training: Document Man	100%	<p>Areas to be covered:</p> <p>Introduction to SharePoint .</p> <p>Document Library Settings (metadata, views, permissions, etc.).</p> <p>Document workflows and versioning.</p> <p>File and folder naming guidelines.</p> <p>Co-authoring.</p> <p>Media Storage in SharePoint – images, audio, and video files.</p> <p>Document Templates.</p> <p>Offline Syncing – settings and how to handle Syncing Errors.</p>
6-Mar-24	SharePoint Session 2: Permissions,	100%	<p>Areas to be covered:</p> <p>Network drive vs SharePoint Online (benefits of SharePoint Online).</p> <p>SharePoint and OneDrive Sharing Options.</p> <p>Search and Navigation.</p> <p>Security and permissions.</p>
13-Mar-24	SharePoint Session 3: Sensitivity La	100%	<p>Areas to be covered:</p> <p>Sensitivity Labels .</p> <p>External Sharing.</p>
27-Mar-24	MS Teams Session 1: Content Mana	100%	<p>Areas to be covered: Introduction to MS Teams.</p> <p>Relationship between Teams and Sites.</p> <p>Standard vs Private vs Shared Channels.</p> <p>How to safely share content in Teams.</p> <p>Searching for content in Teams.</p> <p>External and Guest Users in MS Teams.</p>
3-Apr-24	MS Teams Session 2: Meetings, Eve	100%	<p>Areas to be covered: Meeting Recordings: How and where they are stored.</p> <p>Webinars and Events (Townhall, virtual appointments, controlled-content meetings).</p> <p>How to use apps within Teams and during meetings (Whiteboard, MS Forms etc.).</p>
10-Apr-24	Managing Videos using Microsoft St	100%	<p>Areas to be covered: Introduction to MS Stream.</p> <p>Leveraging Microsoft Stream for internal video production.</p> <p>Editing and distribution of videos in Stream.</p> <p>Integrating MS Forms in Stream Videos.</p> <p>Sharing Stream videos externally.</p>

17-Apr-24	MS Forms Automation	100%	<p>Areas to be covered: Introduction to MS Forms.</p> <p>Group Forms vs Individual Forms.</p> <p>Using Forms in Teams Meetings .</p> <p>Getting the most out of MS Forms via Power Automate.</p>
24-Apr-24	Using Planner to Manage Projects	100%	<p>Areas to be covered: Introduction to Planner (include Learning Pathways).</p> <p>How to use Planner to track and manage projects.</p>
1-May-24	How to use Microsoft Bookings	100%	<p>Areas to be covered: Introduction to MS Bookings (Learning Pathways).</p> <p>Creating and Managing Bookings using MS Bookings.</p>