

Drawing Access Together

An access assessments report of findings and recommendations.

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Freedom of Information and Privacy Association

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for the British Columbia Freedom of Information and Privacy
Association

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Territorial Acknowledgement

FIPA acknowledges with respect the Indigenous Peoples on whose traditional territory we conduct activities. We acknowledge the insight and knowledge of Elders past, present, and emergent, and their relationship to this land and these issues. While striving to increase privacy protection and access to information for everyone, we recognize that colonization and associated attitudes, policies and institutions have significantly changed Indigenous Peoples' relationship with this land. For many years, those same things served to exclude Indigenous Peoples from the privacy protection and access to information afforded to others. FIPA is committed to redressing those historic and continued barriers.

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.

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Executive Summary

For four years, we used freedom of information to study freedom of information. We obtained policies, training materials, reports and alike documents from every public body subject to the *Freedom of Information and Protection of Privacy Act* and *Information Management Act* to understand how ‘access regimes’ work.

The report accomplishes three things. First, it develops an original analytical method for the study of FOI, and of bureaucratic documents more generally. Second, it describes some general trends regarding the over 50 access regimes we examined, finding that the overwhelming majority of public bodies do not set standards for how records are to be retrieved to be redacted. These are critical moments in FOI processing for applicants, and often the basis of complaints to the Office of the Information and Privacy Commissioner. We also comment on the quality of documentation in general, observing that some of the public sector’s documents are highly performative, from a philosophy of communication perspective, and warrant further scrutiny. In doing this, we show how the functioning of an access regime can be understood in ways that go beyond the numbers. Meeting statutory timelines for the processing of FOIs is a necessary—but insufficient—feature of a healthy transparency system. Thirdly, we make six recommendations from our research:

1. Research, writing, and formatting literacies need to be recovered.
2. British Columbia needs a recordkeeping statute with a vision that serves the interests of government and public, both today and in the future.
3. Recordkeeping needs to become a core administrative imperative in the public sector.
4. To start doing things differently, Information professionals must be afforded greater respect.
5. Correctness must replace timeliness.
6. The “consultative committee” mentioned in section 67 of *FOIPPA* should be established.

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This study is the product of several years of work. Methodologically and substantively, it was a one-shot case study in a different way of doing research on FOI. FIPA would not have been able to pull it off without the generosity of public servants who shared their realities with us—specifically, the membership of the Association of Records Managers and Administrators (especially its Vancouver Island Chapter) and the Archives Association of British Columbia, along with those who attended their conferences, and public sector FOI workers across BC with who spoke with us and offered their wisdom with pride and enthusiasm. All of us made this study possible, and for that, we have nothing but sincere gratitude to offer; we hope that our report is an honest and accurate recital of the ideas generated across countless, but each essential, conversations. FIPA would also like to thank reviewers Melissa Sexsmith and Eric Ward for their invaluable feedback on this work.

Our recommendations, as well as any errors or omissions, are our own.

Introduction

Starting in late 2022, the Freedom of Information and Privacy Association (FIPA) set out to develop a greater understanding of how the statute that is our namesake, the *Freedom of Information and Protection of Privacy Act (FOIPPA)*, is administered.

FOIPPA gives ordinary people a right to access records created by their governments, subject to limited exceptions. It applies to thousands of public bodies across the province, from large ministries and Crown corporations to school boards and fire departments. Because this right depends so much on *records* themselves, we added research into the administration (of select parts of) the *Information Management Act (IMA)* into our ambit of concern. We were most interested in how *IMA*'s mandate to the Chief Records Officer (CRO), with respect to giving direction to everyday recordkeeping, were mobilized. Meaning, we looked at sections 3 and 6, in particular.

We examined two kinds of public bodies: *Ministries (n=24)* and *Broader Public Sector Organizations (n=32)*, or *PSOs* for short. Every PSO receives and processes its own FOI requests; ministries are different. Information Access Operations (IAO), a unit of the Ministry of Citizens' Services, corresponds with applicants at every stage of the process from intake to file closure. Upon receiving a request directed at one of its 24 "clients," as they refer them, IAO sends a request to whomever is responsible on the client-end for receiving that request, who will in turn direct the request to the appropriate unit within the organization.¹ Once the client has conducted a search for records, the client will send records back to IAO along with a "harms assessment" made up of observations about how certain information within records may harm the Ministry. From this, IAO will create a "redline" copy of the records that indicates the applicable exceptions under *FOIPPA* and provide that copy back to the client Ministry as a recommendation. If the Ministry approves, the "release package" is disclosed to the applicant.

¹ Outside IAO, that unit is often called the "Office of Primary Interest" or "Office of Primary Responsibility." Those terms do not appear in their records often.

Increasingly, the successes or failures of the systems in place to do this work are becoming defined in terms of timeliness.² On average, quality becomes flattened to a question of speed.³ FIPA stands by the need for timely responses to FOI requests. However, timeliness metrics do not capture all that we care about. It is often said there are ‘three Es’ in public administration: efficiency, economy, and effectiveness.

We set out to create a better description of what goes on when a public body tries to comply with the *FOIPPA*, shifting the focus from efficiency onto *effectiveness*. We were inspired by former Saskatchewan Information and Privacy Commissioner Gary Dickson’s definition of an ‘access regime’ as “not only the statutes but also the machinery that governments and public bodies create to meet their obligations.”⁴ Included among the things that mattered are:

[...] those officers within executive government tasked with meeting statutory access requirements ... and the extent to which they are supported and resourced as well as the kinds of tools and training developed to assist them in their key role. The access regime also includes the decisions, practices, and procedures of oversight bodies [as well as] the executive and management levels of leadership within government and the extent to which value is assigned to complying with access legislation.⁵

This idea is where this study began. We quickly realized that recordkeeping mattered tremendously—which is how we became interested in the *Information Management Act*, passed in the waning days of the Clark government, in the wake of the Triple Delete scandal (with its most promising provisions about a ‘duty to document’ coming

² See, for example, Michael McEvoy, Review of Government’s performance in responding to access requests, Office of the Information and Privacy Commissioner for British Columbia, 2024 CanLII Docs 439, <https://canlii.ca/t/7n8vm>. Each year, the Minister of Citizens’ Services tables an annual report on the administration of FOI—the essence of which is a year-to-year timeliness comparison. Those reports can be downloaded from the B.C. government’s website: <https://www2.gov.bc.ca/gov/content/governments/about-the-bc-government/open-government/open-information/completed-foi-requests>.

³ For an overview of what metrics do to values, see: C. Thi Nguyen, “Value Capture,” *Journal of Ethics and Social Philosophy* 27, no. 3 (2024), <https://doi.org/10.26556/jesp.v27i3.3048>.

⁴ Gary Dickson, “Access Regimes: Provincial Freedom of Information Law across Canada,” in *Brokering Access*, ed. Mike Larsen and Kevin Walby (University of British Columbia Press, 2012), 68-69, <https://doi.org/10.59962/9780774823241-007>.

⁵ Ibid.

into effect in 2019).⁶ To add to the challenge, we wanted to become more active users of *FOIPPA* to understand what applicants were experiencing. It is in this spirit that we used FOI to study FOI.

In December 2025, we published a preliminary report that documented our findings so far. We gave ourselves four further questions to focus on going into 2026:

- how documents are retrieved, and in particular how *requests* are formed and transformed;
- how documents are severed, with specific attention to how ‘harms assessments’ are composed;
- how records management obligations are organized; and
- what the occupational identity of records management and FOI work is.

We concentrate on redaction and recordkeeping in this report, which is a high-level overview of what we have learned since the publication of our preliminary report. It is a high-level overview because honestly representing the data means acknowledging the incredible variety of public bodies whose records are our data, which amount to over 36,000 pages of incredibly decontextualized documentation.

It is impossible to make universal statements about what 56 different places have in common at this level of analysis. To account for this, the statements we make here are generalizations; every public body escapes a few of our claims. For readers who are public servants working in public bodies that we examined, we anticipate this study will be most useful if you collaboratively and honestly assess within your workplaces how true to your experience our findings are. However proximately or distantly they resonate with you should guide your interpretation of our work. We appreciate this takes more effort than the regular policy report, but we believe it will provide a more accurate picture of how our results apply to your circumstances than if we had given precise, narrowly-cast direction from the outside.

⁶ Elizabeth Denham, Access Denied: Record Retention and Disposal Practices of the Government of British Columbia, Office of the Information and Privacy Commissioner for British Columbia, 2015 CanLII Docs 5302, <<https://canlii.ca/t/t0bv>>.

Method

This study is an ethnographically informed exploration of the “live archive”⁷ in which bureaucratic documents are considered literary genres, vehicles of knowledge, and information technologies. It treats collectives of documents as an infrastructure, which is useful analytically, because it allows us to draw on information studies scholar Susan Leigh Star’s insight that infrastructures tend to be noticed when they break.⁸ The data we used are texts, which broadly meant any material the public service inscribed something in, from PowerPoint presentations to technical standards. There are two kinds of texts in this data, although they are infrequently mutually exclusive: didactic texts that can instruct something and deontic texts that can control something. The keyword is “can.” These texts do not do things on their own; but they certainly have agency. By agency, we simply mean “anything whose existence and status has consequence.”⁹

In 2022 and 2023, we made a series of exploratory informal and then formal requests to public bodies across British Columbia to sensitize ourselves to the type of data we would be working with. We obtained copies of documents that pertained very generally to the administration of FOI, mostly ad-hoc internal reports and spreadsheets detailing different variables about requests processed by public bodies.

At this point, our specific research objectives were still unclear. In late 2023, we used these documents to synthesize a working understanding of what FOI looked like in the eyes of public bodies, and were thus able to focus our research efforts. We decided to pursue a study of every public body subject to both *FOIPPA* and *IMA*—56 unique organizations in total—and created a list of 25 documents or information we would need from each public body (these lists are

⁷ Alex Luscombe and Kevin Walby, “Theorizing Freedom of Information: The Live Archive, Obfuscation, and Actor-Network Theory,” *Government Information Quarterly* 34, no. 3 (2017): 379–87, <https://doi.org/10.1016/j.giq.2017.09.003>; Kevin Walby and Mike Larsen, “Getting at the Live Archive: On Access to Information Research in Canada*,” *Canadian Journal of Law and Society / La Revue Canadienne Droit et Société* 26, no. 3 (2011): 623–33, <https://doi.org/10.3138/cjls.26.3.623>.

⁸ Susan Leigh Star, “The Ethnography of Infrastructure,” *American Behavioral Scientist* 43, no. 3 (1999): 377–91, <https://doi.org/10.1177/00027649921955326>.

⁹ Michael Buckland, “Document Theory,” *Knowledge Organization* 45, no. 5 (2018): 425–36, <https://doi.org/10.5771/0943-7444-2018-5-425>, 430.

included as Appendix B and C). From this, we sent each organization five separate requests between January 2023 and November 2024. To accommodate for the differences between the centralized administrative relationships among ministries and the self-determined administrative practices in the broader public sector, we sent different versions of requests depending on the type of public body.

In 2025, we began thinking about the analytical method we use here, which is a modified version of actor-network theory (ANT)¹⁰—modified with insights from linguistic anthropology,¹¹ institutional ethnography,¹² ethnomethodology,¹³ science and technology studies,¹⁴ organization studies,¹⁵ communication studies,¹⁶ historical sociology,¹⁷ and interpretive political science.¹⁸ ANT is best understood as an analytical method with an ontological proposition: that “the social” (as in ‘social forces’ or ‘social issues’) is not real except in the specific moments in which actors—human and nonhuman—enter relations that generate phenomena. In classic ANT studies, the data generation process looks

¹⁰ Bruno Latour and Steve Wolgan, *Laboratory Life: The Construction of Scientific Facts*, with Jonas Salk (Princeton University Press, 2013); Bruno Latour, *The Making of Law: An Ethnography of the Conseil d'état*, Reprinted (Polity Press, 2010); Bruno Latour, *Reassembling the Social: An Introduction to Actor-Network-Theory*, Clarendon Lectures in Management Studies (Oxford University Press, 2007).

¹¹ Matthew S. Hull, *Government of Paper: The Materiality of Bureaucracy in Urban Pakistan* (University of California press, 2012); Matthew S. Hull, “Documents and Bureaucracy,” *Annual Review of Anthropology* 41, no. 1 (2012): 251–67, <https://doi.org/10.1146/annurev.anthro.012809.104953>.

¹² Dorothy E. Smith, *Texts, Facts and Femininity: Exploring the Relations of Ruling* (Taylor and Francis, 2002); Dorothy E. Smith, “Texts and the Ontology of Organizations and Institutions,” *Studies in Cultures, Organizations and Societies* 7, no. 2 (2001): 159–98, <https://doi.org/10.1080/10245280108523557>.

¹³ Harold Garfinkel, *Studies in Ethnomethodology* (Prentice-Hall, 1967).

¹⁴ Lucille Alice Suchman, *Plans and Situated Actions: The Problem of Human-Machine Communication* (Cambridge University Press, 1987); Bruno Latour, “Visualisation and Cognition: Thinking with Eyes and Hands,” in *Knowledge and Society Studies in the Sociology of Culture Past and Present: A Research Annual*, 6th ed. Henrika Kuklick (JAI Press, 1986); D. Pontille Jérôme, “What Did We Forget about ANT’s Roots in Anthropology of Writing?,” in *The Routledge Companion to Actor-Network Theory* (Routledge, 2019);

¹⁵ Julian E. Orr, *Talking about Machines: An Ethnography of a Modern Job*, Collection on Technology and Work (ILR Press of Cornell University Press, 1996); Karl E. Weick, *Sensemaking in Organizations*, Foundations for Organizational Science (1995; SAGE Publications, 2010).

¹⁶ François Cooren, “Textual Agency: How Texts Do Things in Organizational Settings,” *Organization* 11, no. 3 (2004): 373–93, <https://doi.org/10.1177/1350508404041998>. We and Cooren were both influenced by J. L. Austin’s *How to Do Things with Words* (1962).

¹⁷ Ann Laura Stoler, *Along the Archival Grain: Epistemic Anxieties and Colonial Common Sense* (Princeton University Press, 2009).

¹⁸ Dvora Yanow, *Conducting Interpretive Policy Analysis*, Qualitative Research Methods Series, (Sage Publications, 2009); Dvora Yanow, *How Does a Policy Mean? Interpreting Policy and Organizational Actions* (Georgetown University Press, 1996); Bernardo Zacka, *When the State Meets the Street: Public Service and Moral Agency* (The Belknap Press of Harvard University Press, 2017).

very similar to ethnography; participant observation, interviews, and archival and artifactual research are conducted together. We only have access to one such data type in this study (i.e., documents) which is why some modification is necessary. Making sense of texts in action necessarily depends on knowing much more about their provenances and watching their uptake in everyday work. The activities we cannot directly study with the methods available to us include the actual circulation of bureaucratic documents—we could not observe how the documents we collected were used. So, rather than studying how FOI work is organized *by* texts, we are studying how FOI work is organized *in* texts, which, methodologically, is a more precise endeavor than classic ANT studies were concerned with. The genesis, however, of ANT’s call to examine agency symmetrically (i.e., without drawing lines between the natural and the social, or between other dualisms such as form and content) stands entirely. To accomplish this, we devised four modes of action¹⁹ by which we thought it useful to analyze the documents:

- *stating*, for saying something;
- *regulating*, for controlling obligations to do or refrain from doing something;
- *abdicating*, for relinquishing an obligation to do or refrain from doing something; and
- *facilitating*, for establishing relationships with other actors.

Thus, the analytical procedure is an exercise in elucidating how public bodies describe and articulate their own work within these modes.²⁰ Rather than against the grain, these documents are read *along* their grains.²¹ We were focused on what these documents make possible and less interested in inquiring into what was ‘hidden’ by them or what could be ‘revealed’ from closely studying their prejudices. We

¹⁹ These, in concept, are meant to be like John Law’s “modes of ordering” in *Organizing Modernity* (1994), which he described as “recurring patterns embodied within, witnessed by, generated in and reproduced as a part of the order of human and non-human relations” (83). They are inside networks of action; they do not “drive” them.

²⁰ Fabian Muniesa and Dominique Linhardt, “Trials of Explicitness in the Implementation of Public Management Reform,” *Critical Perspectives on Accounting* 22, no. 6 (2011): 550–66, <https://doi.org/10.1016/j.cpa.2011.06.003>.

²¹ Stoler, *Along the Archival Grain*. Similar insights are found in Rita Felski, *The Limits of Critique* (The University of Chicago Press, 2015).

conducted an inquiry into world *views*—literally, how the world is viewed—by holding documents to their words and graphics.²²

²² “People often talk of “worldviews” but this powerful expression is taken metaphorically. Alpers provides this old expression with its material meaning: how a culture *sees* the *world*, and makes it visible.” Bruno Latour, “Visualisation and Cognition,” citing Svetlana Alpers, *The Art of Describing*, (1983).

Findings

Using the methodology detailed above, we focused our analytical efforts on two areas of the FOI process—recordkeeping and redaction—and one meta-procedural area—what is absent from the documents. Here’s what we found.

On recordkeeping

We wanted to know *how records management obligations are organized*.

The answer: heterogeneously. Across the organizations we examined, records management worlds are messy worlds.

First, a great variety of terms are at play. The terms *information*, *document*, and *record* are often used interchangeably across public bodies. Yet to records managers, these are all different things. The confusion may be attributed in part to *FOIPPA* itself: the freedom it grants is *of information* but enabled by access to *records*—many of which are actually *documents* until they are being held for a specific business purpose (according to rules for retention and classification). *IMA*’s definition of “government information” (i.e., “recorded information created or received by a government body in connection with government business”) is not widely referenced or circulated.²³ The lack of agreement projects a kaleidoscopic narrative of what counts as proper recordkeeping practice. The gravity of this ostensive conceptual incompleteness, one might argue, rivals what it might be like to have a fundamentally erroneous or intersubjectively unstable concept of *surplus* in financial management, or of *cause* (vis-à-vis termination) in the realm of human resources. It strikes at the essence of *what* is being managed.

The differences between terms most often collapse in the documents communicating records management to public servants, especially in the primary genre of communicating records management obligations, which is the presentation. Words are usually minimal, with most space

²³ Geoffrey Yeo, “Concepts of Record (1): Evidence, Information, and Persistent Representations,” *The American Archivist* 70, no. 2 (2007): 315–43, <https://doi.org/10.17723/aarc.70.2.u327764v1036756g>; Li Xie, “The Nature of Record and the Information Management Crisis in the Government of Canada: A Grounded Theory Study” (University of British Columbia, 2013), <https://doi.org/10.14288/1.0073711>.

on individual slides taken up by humorous or stock images, and actions that establish control over records creation and classification are articulated as best practices—or matters of individual discretion. They rarely express connections with other relevant actors—i.e., systems for recordkeeping, other policies, etc.—except in passing, treating recordkeeping as a commonsensical and self-evident literacy outside the ambit of regulatable conduct. In sum, there are no standards or expectations to reach, just “best practices” to *follow*.

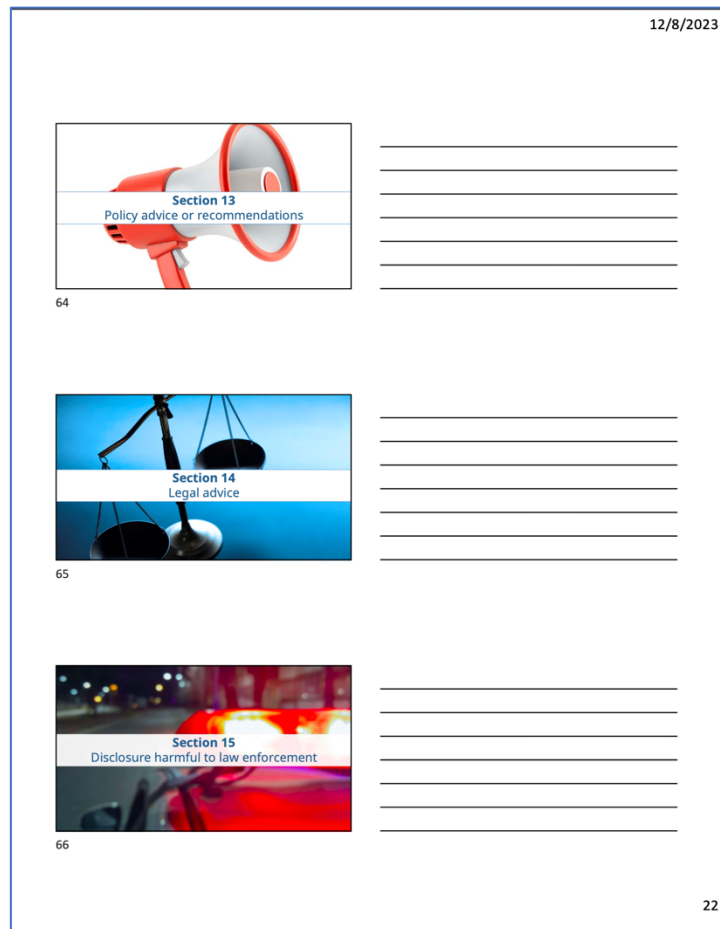


Figure 1: Slides from a Ministry presentation about FOIPPA.

We observe that the documents articulate recordkeeping practices consistent with a paradigm called post-custodialism, under which everyone is their own records manager, and the archivist or records manager fulfils an oversight role. Post-custodialism contrasts with the custodial paradigm, which actively involved records managers well before records’ functional business need lapsed, and was the dominant paradigm for Canadian recordkeeping until the 1990s. Broadly, post-custodialism was apparent in how the collected policies—insofar as they existed—articulated responsibility for records. However, there was

no superordinate strategy document outlining this process. In fact, very few public bodies maintain plans that establish a recordkeeping approach. Core concepts in records management practice often discussed in records management textbooks like naming conventions, metadata application, and classification—are inconsistently mandated, and framed as common conceptions of the workplace rather than specifically designed technical specifications with consequences for service delivery. Further, whenever recordkeeping obligations do come into focus, it happens most clearly in: (1) relation to specifically operational records; and (2) service delivery organizations. Case files are the most valuable type of record, it seems. Here, a connection to theoretical records management convention is facilitated via the administrative vs. operational dichotomy that organizes records first on the basis of whether or not they fulfil a sort of meta-mission (e.g., human resources, finance, information technology, etc.) or core business imperative (e.g., quasi-judicial decisions, permit applications, compliance assessments, etc.). This dichotomy is the most enduring concept across public bodies vis-à-vis recordkeeping.

Despite the promises of *IMA*'s passage, no clear pattern distinguishes those public bodies who reference *IMA* and those who do not. Statutory obligation is not the basis upon which records management practice is thought about, except perhaps in the few public bodies—mostly in the broader public sector—that emphasize it with consistent references to *IMA* (in which case, references occur in quick reference documents, often with a more discrete visual rhetoric). Notably, whenever *IMA* is referred to, it typically happens in one of two scenarios.

The first is a reference (that ranges in explicitness) to section 19 of *IMA*, which states “The head of a government body is responsible for ensuring that an appropriate system is in place within the government body for managing and securing government information.” Often, the only part that is explicitly stated is about the “appropriate system” imperative, which tends to occur with little context. The formal definition of “appropriate system” is found in an order under *IMA*, CRO Directive 01-2019. It states:

Creating an appropriate system

1. The head of a government body must, in ensuring that an appropriate system is in place within the government body for creating and maintaining government information that is

an adequate record of that government body's decisions, take reasonable steps to ensure that the government body complies with this directive and is guided by any guidelines issued under section 6(1) of the *Information Management Act*.

Elements of an appropriate system

2. An appropriate system must include at least the following:
 - a. recorded policies and procedures and defined roles and responsibilities for creating and maintaining, in a manner consistent with this directive and any applicable enactments and provincial government policies, adequate records of decisions that the head of the government body has determined, in accordance with this directive and any guidelines issued under section 6(1) of the *Information Management Act*, are to be recorded;
 - b. appropriate recordkeeping systems that ensure the preservation and accessibility of records of decision over time;
 - c. a program for ongoing training of relevant employees of the government body respecting the creation and maintenance of adequate records of decisions;
 - d. a program for monitoring implementation by the government body of the system and of its compliance with applicable laws and government policies.

Our data is almost entirely silent on the CRO Directive and its contents. We received nothing that evaluates a new or existing recordkeeping system for adherence to *IMA* via the directive. Anything done that is related to these criteria (such as item c, training—in the form of presentations to employees) does not identify itself as having any relationship with the Directive. *IMA* and its instruments perpetually *exist off the radar of most initiatives it purports to regulate*, even when they are undertaken.

The second instance in which *IMA* is invoked is job descriptions for records management workers, wherein *IMA* is framed as an aspiration or a standard, but without substantive content. Its entailments are usually an appeal to individuals to comply with “legislated requirements” and nothing more particular than that. The whole cycle is made more confusing given *IMA* merely empowers a statutory decision-maker (i.e., the CRO) to issue directives. And often, such directives ultimately say nothing more than ‘have a policy.’ The best

single instance of this is a Ministry job description that creates a duty to manage records “in the spirit of the *IMA*.”

Across both modes of invocation, there is no everyday representation of *what IMA is for* and what practices it imagines bureaucrats doing, with what, and when, following its passage. We found no evidence that the government attempted to systematically implement the “documenting government decisions” directive, which was enabled under a 2017 *IMA* amendment BC “the first Canadian province to legislate a duty to document.”²⁴ Nothing came of it. Records creation plays no part in civil servants’ records management education. One of the few ministries that does acknowledge this duty makes note of it in a Local Area Network manual (which, as of 2024, described the amendment as “new”), said it already “has good practices in place to meet this expectation” and moved on. Successive policy instruments pass down the responsibility to define the true intention of the statute, which is ultimately never explicated other than as a certification of current practices and the ne to keep doing them. By contrast, the silence of the *IMA*, might be so loud that it is easy to look at the documents we obtained to forget what *IMA* says. It is a trite but overlooked reality that passing legislation does not automatically induce the change in state it presumes to occur. Despite the systemic promises and ambitions of the government of the day, we see little to no trace of the statute’s influence in how the obligation to manage government records is understood by public servants in their everyday work. Democratically speaking, it is difficult to imagine a scenario in which, according to the worldviews expressed by and in these documents, anyone could ever be held accountable for mismanagement of the public record.

²⁴ Ministry of Finance, “British Columbia Legislates a ‘Duty-to-Document,’” BC Gov News, March 8, 2017, <https://news.gov.bc.ca/releases/2017FIN0014-000509>.

On redaction

We wanted to know how severance (redaction) is understood in public bodies. What is it for? How is it done?

Severance is an inherently legal undertaking. And like all law, FOI law is dynamic; it evolves. FOI jurisprudence is developed primarily in the orders produced by the Office of the Information and Privacy Commissioner, drawn up to conclude appeals under *FOIPPA*. To a lesser extent, the FOI jurisprudence is also formed in the BC Supreme Court—which hears appeals of the OIPC’s decisions—and the BC Court of Appeals. Even more rarely, but importantly, are decisions from the Supreme Court of Canada.

You would not necessarily know this from most of the documents about severance we obtained. The documents’ didactic content is static and self-contained. There is infrequently an attempt to make explicit the logic that addresses *what exceptions are for*. The causal logic of secrecy and standards of evidence are taken as self-evident, or not in need of demonstration in locally relevant circumstances. Further, the discretionary character of certain exceptions—the distinction between whether something *may be* withheld versus *must be* withheld—is lost. The modal verbs disappear among the brevity, especially in ministries.

Outside IAO, the closer you look, the less *freedom of information law* you will find in the *freedom of information process*. It is a process of case management. One of the easiest places to see this is in the business process maps (or models, diagrams, etc.) that ministries and broader public sector organizations produce. These representations transform FOI work into a highly linear, stadial process with discrete start and end points. Among the genres of documents we encountered, they are probably the most representative artefacts of a scientific management ideology. What stands out is their relationship to time limits under the *Act*. Under section 7, public bodies have no more than 30 business days to respond to a request, unless section 10 applies. *FOIPPA* is unambiguous about this being the normal maximum, yet many of the initial response letters (often called “acknowledgement letters”) we received include a commitment to make every effort to “respond sooner” or “respond earlier.” Hence our surprise when we noticed the majority of business process representations, whenever they do articulate a timeframe, represent

FOI work as *normally taking place over 30 business days*. For example, one large staff (as in not service-oriented) Ministry divides its intake functions over 1 day, searching over 10 days, severing over 12 days, office of primary responsibility feedback over 6 days, and final sign-off over 1 day. Similar time and work forecasts appear across the public service. The worldviews articulated by these representations make the statutory maximum the everyday mean.

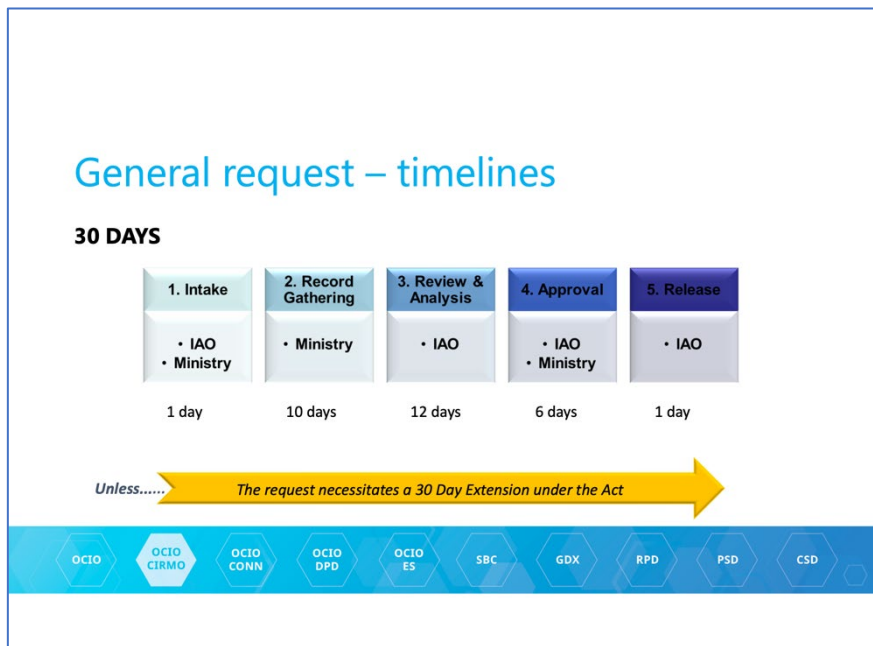


Figure 1: Example from a Ministry

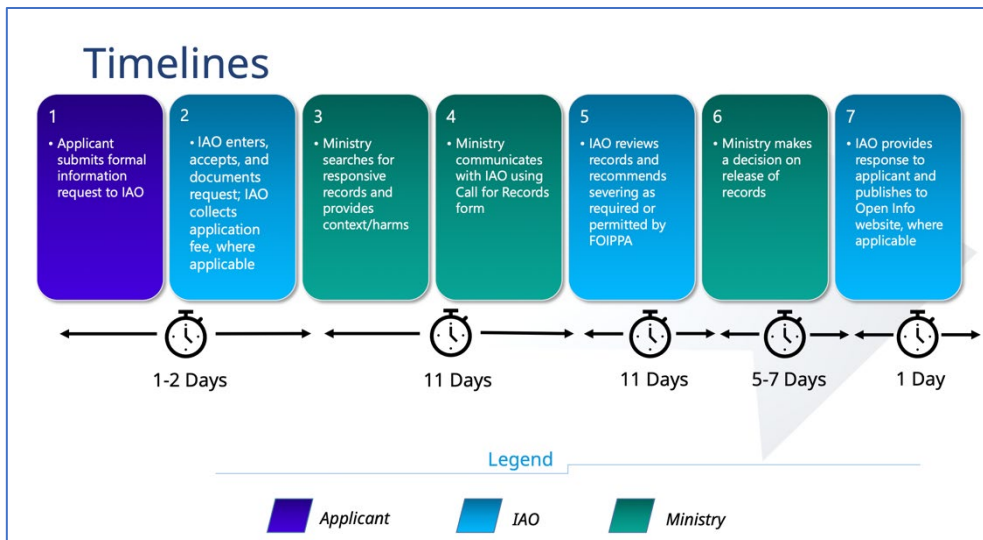


Figure 2: Another example from a Ministry

FOI work is deeply analytical, but the guidance FOI workers receive is generally silent on the skills or modes of reasoning that go into

deciding to apply severance. IAO workers, according to a Ministry presentation, use the following to achieve severance:

- harms assessments from the ministry
- the specific context of the records
- our knowledge interpreting FOIPPA
- our knowledge of applicable manuals, directives, regulations, and other pieces of legislation
- similar records in other ministry's requests (past and present)
- a vast amount of online research
- individual experience as an analyst
- existing OIPC Orders and emerging patterns in OIPC decisions

In some dialogical documents (i.e., e-mails, for the most part) and in job descriptions, there are mentions of “research” being conducted by FOI workers. The practices—and outputs—to which “research” refers are not self-evident. We did not encounter instances of research work conducted by IAO Analysts, which indicates “research” is confined to the case-level and more generalizable inferences are not what “research” is meant to mean. Following OIPC orders is articulated as an option: “Do you ever think, I sure do wish there was an easy and convenient way to be notified about new OIPC Orders and Reports?” a OneNote entry asks, before offering an RSS solution. Jurisprudential engagement is a matter of individual discretion. It is not imperative. IAO’s “Training and Communications Plan for New Staff” contains “Sample discussion prompts” for trainers and employees. The suggested lines of inquiry are:

- How are things going from your perspective?
- What topics have you been focusing on this past month?
- What has gone well?
- What will you revisit or continue focusing on?
- What will you focus on next?

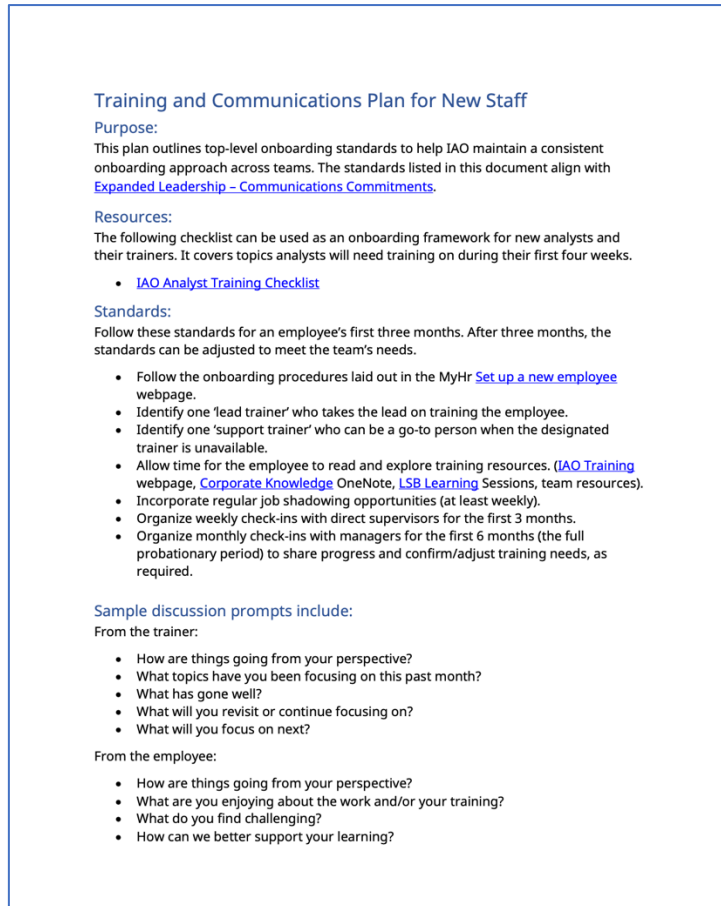


Figure 3: Information Access Operations training plan document

As this conversation is scripted and according to the document, responsibility falls on the employee to recognize their own skill issues, if any. It relies entirely on an untrained eye. Trainers are not asked to concern themselves with how their trainees' work takes place in the wild. In the same document, exposure to colleagues and collaborative work is articulated as the exception, rather than the norm. This is significant in the context of street-level bureaucracies—the discretion-laden frontlines of policy implementation—in which the formulation of policy is paradigmatically a collegially based endeavor.²⁵ FOI work is generally very individual.

There is one interaction, though, that earns frequent mention both in IAO documents and across the provincial government: the interaction between IAO analysts, who know *FOIPPA*, and “subject-matter

²⁵ Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (Russell Sage Foundation, 1980); Steven Maynard-Moody and Michael C. Musheno, *Cops, Teachers, Counselors: Stories from the Front Lines of Public Service* (University of Michigan Press, 2003).

experts” who know the client public body’s records and their sensitivities. These are the most important moments for confirming the application of severance, but how these unfold goes almost entirely without mention. IAO does not maintain, and neither do its clients, any recorded conventions for what the proper degree of deference to IAO’s severance recommendations is or should be. Nobody is asked to be the judge—which partially seems to be an effect of centralization and the separation of subject-matter experts from *FOIPPA* experts. Judgment is distributed between the client and IAO. Interestingly, compared to most public bodies, IAO retains the greatest inventory of recorded knowledge about *FOIPPA*. That knowledge is also generated at the furthest distance from the records’ original context compared to all other public bodies we examined. The only public body that might start to come closer is the Provincial Health Services Authority, but even that comparison is not particularly advantageous. The volume of records, the number of records creators, and the diversity of files all make IAO a unique case not only in our study but in Canada. We suspect it is also what accounts for the extent to which circular genres (i.e., memoranda, bulletins, etc.) within IAO are typically issued for situations with stable characters and instantly recognizable features. For instance, information that could comprise information security is the most frequently remarked about in IAO’s documents, likely because recognizing an ID, barcode, or intranet link is less controversial than recognizing information that may be subject to a more context-dependent exception.

IAO’s documents express aspirations to calibrate their severing “recommendations” to achieve consistency, but its clients do not commit themselves in writing to achieving a similar degree of consistency (when choosing to accept or reject IAO’s recommendations). In particular, Ministries make no substantive attempt to control the interpretation of discretionary exceptions, which defy the “subsumptive” model of policy implementation (i.e., fitting a case to a category, which determines the response on the basis of *modus ponens*) by requiring competing injunctions be addressed.²⁶ They explicitly require judgement and additional fact-finding procedures, relative to other exceptions. How they do this for the average request is not clear. Reasonableness, materially relevant to

²⁶ Zacka, *When the State Meets the Street: Public Service and Moral Agency*, 40-41.

such determinations, is an undocumented virtue. The right methods to achieve reasonableness are embodied by default. The right degrees of humility and judgement, two virtues necessary for the conduct of any inquiry, are never commented upon (at least in our data, which all exist above the level of the individual case, and, which, we acknowledge, is where those virtues materialize most meaningfully).

Both the *FOIPPA Manual*—the online resource maintained by the Ministry of Citizens’ Services that is most other public bodies’ reference text, frequently hyperlinked in less comprehensive documents—and IAO’s comparatively vast internal resources might look misleadingly self-contained. To varying degrees, they both depend on some easily taken-for-granted intersubjective meanings and relationships between concepts. From a policymaking perspective, this may not be a problem. We could keep pointing out to the *n*th degree that *x* is not defined for every iterative edition of such documents. Crying out for ‘more detail’ eventually deny the inevitable ambiguity of language and the need to resolve interpretive controversies.²⁷ At some point, the rules will “run out” as Zacka says,²⁸ and faculties of judgment and improvisation²⁹—“the craft of public administration”³⁰—must emerge. Such capabilities are what make bureaucrats *more* than ‘cogs in the machine.’ Forever pressing for greater written precision, we think, comes from an unrealistic Cartesian anxiety.³¹ Maybe, with respect to FOI work and severance it is not the letter of the law we are concerned with so much as the ability to *speak legally* about the letter of the law. While many researchers have weighed in on similar questions, our position is as Zacka puts it:

To acknowledge the positive contributions that everyday casuistry and peer level accountability make to the functioning of our public institutions is not to relinquish altogether our commitment to established principles of institutional design. It is, rather, to attain a

²⁷ Charles Taylor, “Interpretation and the Sciences of Man,” in *Interpretive Social Science: A Reader*, ed. Paul Rabinow and William M. Sullivan (University of California Press, 1979).

²⁸ Zacka, *When the State Meets the Street: Public Service and Moral Agency*.

²⁹ Regarding concepts “disciplined improvisation” in decision-making, see Phaedra Daipha, *Masters of Uncertainty: Weather Forecasters and the Quest for Ground Truth* (The University of Chicago Press, 2015).

³⁰ Roderick A. W. Rhodes, “Recovering the Craft of Public Administration,” *Public Administration Review* 76, no. 4 (2016): 638–47, <https://doi.org/10.1111/puar.12504>.

³¹ Richard J. Bernstein, *Beyond Objectivism and Relativism: Science, Hermeneutics, and Praxis* (University of Pennsylvania Press, 1991).

more nuanced appreciation of the tradeoffs that are involved when one attempts, in the name of such principles, to press for changes in policy and management that are likely to shake up other valuable facets of an organization's moral ecosystem.³²

The right degree of explicitness might be better put as question of *when you tell someone to figure it out? Or to use your judgment?* We leave that to practitioners to consider—after one last point.

³² Zacka, *When the State Meets the Street: Public Service and Moral Agency*, 158.

On absences

Conducting a practice-sensitive project with varying degrees of practice-insensitive data (i.e., the recognized difference between “on paper” and “in practice”) is the seminal challenge of this work. Often, the literature on historiography or methods of sociological, anthropological, or otherwise ethnographical treatments of documents encourages researchers to look to what is made invisible or unacknowledged in the data. Given what we were working with—mostly monological data³³ with very few words, compared to other forms of documentary data like reports, for example—we found this difficult to do without overstepping our bounds. It would be very easy to critique a lack of detail in manuals about *FOIPPA* or recordkeeping, deny the role of tacit knowledge,³⁴ ignore the agency of physical actors and cognition *in situ*,³⁵ and presume that local instances of everyday FOI fail to meet administrative law’s demand for accounts for action that are specific and articulable in a “culture of justification.”³⁶ Our method is more interested in possibility. It is, borrowing from Rita Felski, an “inquiry into the way knowledge is organized that seeks, as far as possible, to suspend judgments.”³⁷

The existence of certain preconditions for action is not originally what we set our sights on studying. But our attention gradually became drawn to an unanticipated rhetorical occurrence: the use of references to documents that, ostensibly did not exist, or did not contain what they were said to contain. The latter instance was previewed earlier with respect to *IMA*: increasingly granular policy instruments defer definition to a subordinate other until job descriptions eventually mention the notion of a “spirit.” We also encountered utterances where words with specifically textual connotations (e.g., a documented “policy,” “procedure,” “guideline,” etc.) were used without much care as to whether such connotations might give rise to a belief that another

³³ Michail Michajlovič Bachtin, *The Dialogic Imagination: Four Essays*, ed. Michael Holquist, trans. Michael Holquist and Caryl Emerson, University of Texas Press Slavic Series 1 (1982; University of Texas Press, 2011).

³⁴ Michael Polanyi, *The Tacit Dimension*, with Amartya Sen (University of Chicago Press, 1966). See also Haridimos Tsoukas, “How Should We Understand Tacit Knowledge? A Phenomenological View,” in *Handbook of Organizational Learning and Knowledge Management* (John Wiley & Sons, Ltd, 2012), <https://doi.org/10.1002/9781119207245.ch21>.

³⁵ Edwin Hutchins, *Cognition in the Wild* (MIT Press, 1995).

³⁶ *Canada (Minister of Citizenship and Immigration) v. Vavilov*, 2019 SCC 65 (CanLII), [2019] 4 SCR 653, <<https://canlii.ca/t/j46kb>>.

³⁷ Felski, *The Limits of Critique*, 130.

document's existence was entailed by its mention. For example, a "policy" might be gestured to in one document, but whether it exists is another story. These seemed to be empty indexic expressions or infelicitous intertextualities.

In *On Bullshit*, Harry G. Frankfurt develops a theory of what, communicatively and philosophically, it means to 'B.S.' For him, the essence of an act of bullshitting is a lack of fidelity to the truth.³⁸ It is "disconnected from a concern with the truth."³⁹ He writes:

When we characterize talk as hot air, we mean that what comes out of the speaker's mouth is only that. It is mere vapor. His speech is empty, without substance or content. His use of language, accordingly, does not contribute to the purpose it purports to serve. No more information is communicated than if the speaker had merely exhaled.⁴⁰

Consequently, the truth or falsity of an utterance is epiphenomenal. That strikes us as very similar here. Put plainly, it is reasonable to conclude that the contents in some of these documents are bullshit. A similar discursive act is being performed by some of the documents we have obtained when they refer to something that does not exist, but they purport to mobilize their referents *as if* they existed in the way they are implied to. We could be proven wrong by evidence suggesting the existence of a rich, deliberative moral culture embodied in FOI workers. Perhaps these references are not *to* the void, as we suggest, but actually *to* situated minds and actions. But, we doubt that. The terms "best practices" or "established practices" were right there, common and colloquial in the language of the 21st century. We uphold a charitable interpretation that respects the assumed intention of these documents' authors—that "established standards" was not a mistake. It is interesting to consider what "established standards" might look like. For example, a Ministry procedural document (with more formal graphic characteristics than usual) used the phrase "established standards" to refer to the expectations to which its FOI responses need to be upheld. It alleges that such an instrument exists—but the status is unclear. Who established the standard? What is it called? Why not say? There is no document that immediately identifies itself in our data as

³⁸ Harry G. Frankfurt, *On Bullshit* (Princeton University Press, 2005).

³⁹ *Ibid.*

⁴⁰ *Ibid.*, 42-43.

standing in the standard. Insofar as it is articulating a version of a standard that is unwritten and maintained through reflective practice, this document is generating a theoretically significant conception of a standard that differs from ordinary expectations. We propose that, for this document to have any weight, any power to be realized, the meaning of “standard” would have to transcend the exigency to document in the first place. Truly effective, “established” but unrecorded “standards” would suggest that this Ministry is *post-document*; it would suggest that it has transcended the need to commit information to a fixed medium, despite that very act being a seminal feature of modern, rationalized administration.

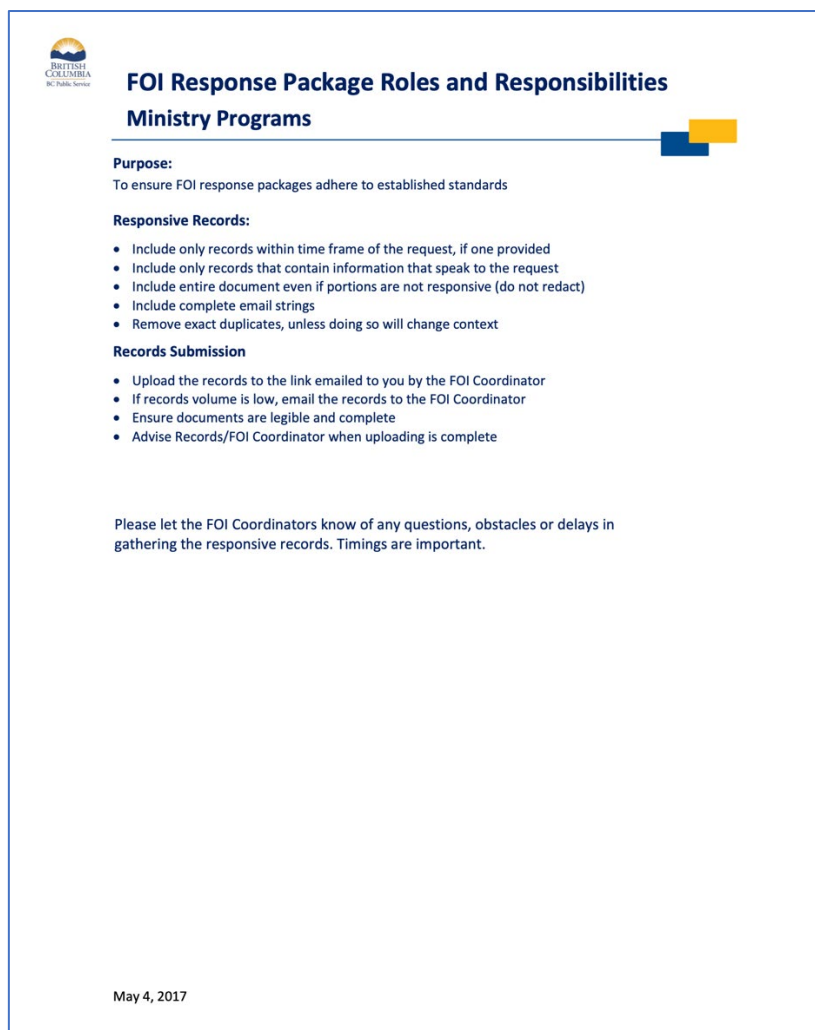


Figure 4: A Ministry procedural document

While the word “standard” is admittedly one of the easier words to use in making this point, it is not the only such phenomenon. Across the public service, phrases like “legislated requirements,” “government policy,” “ministry guidelines,” and the like are replete. The validity of our arguments can be modified accordingly to suit the context of

individual utterances, whose prevalence indicates what Frankfurt might call “a program of producing bullshit to whatever extent the circumstances require.”⁴¹ They seem aimed at the “*feeling* of order, clarity, and rationality” that is important to sensemaking.⁴² It leaves us with a new question: what kind of agency does a document that does not exist have? What about a document that is said to contain one thing, but in reality, does not? For freedom of information, for recordkeeping, we read this as a perpetual hesitancy to commit to consistent courses of action, of decision, both *in situ* and *a priori*. There is a vast gulf between FOI as understood legislatively (i.e., what the statute says) or jurisprudentially (i.e., what the OIPC and courts have said the statute says) and how public bodies understand what it looks like to truly get FOI right.

⁴¹ Ibid.

⁴² Weick, *Sensemaking in Organizations*, 29.

Recommendations

Based on our findings, we offer the following recommendations to all public bodies, recognizing that several such recommendations hinge on necessary action being taken by the Minister of Citizens' Services in particular.

1. Research, writing, and formatting literacies need to be recovered.

There is a serious problem with low-quality of documentation across the public service, particularly in ministries. Research, writing, and formatting literacies need to be recovered.

It might sound odd that a civil liberties group is calling for better documents. But documents and bureaucracy matter no matter the angle from which you approach the state. Documents make public problems legible over distance and across cross-sections in time. The documents we collected, in many cases, did anything but make problems legible; they demonstrated a serious deficit in the articulability of public administration, thus imperiling the ability to deliver an account of action. If asked, 'why was this done this way?' most public servants, with respect to FOI, do not have the luxury of deferring to paper and saying, 'that's what the manual said.'

Preparing documentation is expensive. It can be extremely hard—especially in difficult fiscal environments and polycrisis—to slow down and document. But that is what public servants need to become comfortable saying is needed, and the public needs to become comfortable paying for. This sense of 'bureaucracy' needs defense in popular rhetoric and is particularly important amid ongoing conversations about the role of artificial intelligence and public service reform. We are in urgent need of a documentary renaissance in which the human skills to research issues, write typified responses, and organize them into a graphically coherent text are the province of skilled, dignified bureaucrats empowered to serve the public effectively in a true "culture of justification."⁴³ This is a culture and technology issue—together—and one that will require much more conversation in B.C. and across Canada.

⁴³ *Canada (Minister of Citizenship and Immigration) v. Vavilov*, 2019 SCC 65 (CanLII), [2019] 4 SCR 653, <https://canlii.ca/t/j46kb>.

2. British Columbia needs a recordkeeping statute with a vision that serves the interests of government and the public, both today and in the future.

The *Information Management Act* is rote and circular. British Columbia needs a recordkeeping statute with a vision that serves the interests of government and the public, both today and in the future.

The annual reports under the current *Act* are highly performative. To date, they have been unhelpfully brief presentation slides that spill the most ink discussing what *IMA* and the Chief Records Officer are before ending on what was ostensibly accomplished under their premises at the end. Taking “data-driven government” seriously demands we establish a system to treat information, construed to include records and documents, as resources, akin to people and finances. We need an auditor for the management of the public record, with the necessary resources to be able to examine and effectively recommend better practices. An amended *IMA* needs to include provisions requiring annual recordkeeping plans; the successor to the current Chief Records Officer needs to more frequently use and follow up on their power to issue directives to establish records controls (such as metadata schemas, business classification schemes, standards for naming conventions, etc.).

FIPA views the statutory independence of the Chief Records Officer as a necessity going forward. The CRO has not properly held government accountable for its management of the public record. We would never make the deputy minister of finance the Auditor General *ex officio*—in fact we cannot, compelled by the very same argument here. The future chief keeper of the public record needs to hold the position as a standalone one, independent from government. If records management was truly a matter of ‘common sense,’ we would have figured it out by now. It is not. Consequently, we are not calling for either the Office of the Information and Privacy Commissioner nor the Auditor General to absorb these responsibilities without retaining new internal expertise. Responsibility for the oversight of records management must be assigned in a way that is respectful to recordkeeping informatics as an autonomous professional field.

Beyond this, FIPA does not hold strong views on who takes on the role, as long as they meet these first criteria. We are calling for a mission-driven opening-up of *IMA* that gives the statute a more explicit purpose and puts records managers in control.⁴⁴

3. Recordkeeping needs to become a core administrative imperative in the public sector.

Recordkeeping obligations are not clearly expressed. Recordkeeping needs to become a core administrative imperative in the public sector.

Government must allocate greater resources to these explicitly administrative functions, and political opponents must not take advantage of these critical investments as ‘Red Tape’ when, if done thoughtfully, they could be cutting-edge, world-class, mature and necessary developments in the delivery and organization of public services. We are openly and explicitly calling for more money, and more authority, for administration. A mature public will celebrate this; public services cannot be effectively delivered when organizational memories are cut short by a shared drive in the state of nature and when public servants cannot find what they need to discharge their duties. The mandates of publicly elected representatives depend on the effective management of records. Currently, recordkeeping in B.C.’s public sector follows a train of thought that makes recordkeeping cultures within public bodies—and the user experience—relatively invisible. Records practices need to move to the forefront of our attention, alongside systems and policies. A culture of records stewardship is needed, starting with senior leadership.

4. To start doing things differently, information professionals must be afforded greater respect.

Records management appears to be treated as a marginal practice. To start doing things differently, Information professionals must be afforded greater respect.

⁴⁴ Canada’s information and privacy commissioners have effectively described the relationship between recordkeeping, open government and democracy on multiple occasions. See, for example, <https://www.oic-ci.gc.ca/en/statement-information-and-privacy-commissioners-canada-duty-document>, <https://www.oic-ci.gc.ca/en/resources/news-releases/transparency-default-information-regulators-call-new-standard-government>.

What is it that history is for? While government cannot disclose what information it cannot find, FIPA perceives the first-order challenge posed by poor recordkeeping is that we cannot govern with what we cannot find. The case for the importance of recording information in a fixed medium is made by the weight of history. Archivists and records managers need a seat at all tables concerning systems of record, including but not limited to procurement processes for systems for collaboration, meeting recording, instant messaging, enterprise resource management, lines of business, shared drives and enterprise content management, and notetaking. We note, for example, that the Deputy Ministers' Committee on Digital and Data, which, according to its terms of reference, is "accountable for overseeing digital investments and setting direction for connected digital service delivery, technology, and data management across government,"⁴⁵ does not include the Chief Records Officer as an *ex officio* member.⁴⁶ Point being, we the public are not getting, *inter alia*, the best value for our money invested in information technology when archivists and records managers are excluded. Senior public servants must show a greater interest in recordkeeping and monitoring the implementation thereof.

5. Correctness must replace timeliness.

Timeliness is not a comprehensive measure for all that we care about. *Correctness* must replace timeliness.

To be clear, FIPA is not endorsing the view that timeliness should be altogether given up because non-compliance is so deficient. Public bodies' widespread contempt for their statutory obligations, and successive governments' disinterest in addressing this moral failure, is a worthwhile and necessary object of continued criticism—but there is more to FOI than simply closing files. Not all file closures are equal, though they are certainly treated that way. Specifically, correctness, specifically, whether the *right documents* were *rightly severed* within

⁴⁵ Ministry of Citizens' Services, *Deputy Ministers' Committee on Digital and Data Terms of Reference*, (2025) https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/services-policies-for-government/information-management-technology/imit-capital-investments/dmcd_d_tor.pdf

⁴⁶ The current Chief Records Officer is also the Associate Deputy Minister of Citizens' Services and Government Chief Information Officer, who is an *ex officio* member. But that was not the case before March 2025, and the roles are historically separate. See *Ministerial Order 142*, MO 142/2025, British Columbia, https://www.bclaws.gov.bc.ca/civix/document/id/mo/mo/m0142_2025

the *right time*,⁴⁷ needs to be the new standard by which we judge an access regime.

FOI workers need greater guidance for complex cases. Better resources are needed for every other access regime that is not serviced by IAO and is not routinely exposed to the volume of complex situations to the same degree. In this way, every ‘complex request’ is an opportunity for a lesson to be learned and circulated in a community of practice. As a part of this, the Office of the Information and Privacy Commissioner should explore the preparation and circulation of routine interpretation and practice bulletins—smaller public bodies would especially benefit from this, where FOI is done most frequently on the side of someone’s desk. Program areas being asked to provide records need more guidance on how to interpret a request and how to conduct an adequate search. More controlled vocabularies—ideally, ones that reflect an organization’s current business classification scheme—must be available to applicants so they can effectively interface, via an FOI worker, with the public servant searching for records responsive to their request. Why say “any and all records” (i.e., a vague listing of increasingly unstable genres) when what could really be said is ‘*the record(s)*’?

All of this takes and requires greater time, but would reflect a more even redistribution of the things we care about.

6. The “consultative committee” mentioned in section 67 of the *Act* should be established.

Applicant experiences need to inform the future of FOIPPA. The “consultative committee” mentioned in section 67 of the *Act* should be established.

Government frequently complains that the demand for FOI is increasing, as is the complexity of the prototypical request, but makes little attempt to (1) understand the anatomy or provenance of this trend, and (2) systematically as only one of many means by which transparency may be realized. Legal scholar Seth Kreimer has written that the United States’ *Freedom of Information Act*’s successes in bringing accountability for of the Global War on Terror was only

⁴⁷ The right time is not synonymous statutorily authorized time.

possible “as part of an ecology of transparency that included an infrastructure of federal civil servants, internal watchdogs, reasonably open opportunities to publish and share information, and a set of civil society actors willing to undertake prolonged campaigns for access and accountability.”⁴⁸ We completely agree.

We recommend the government convene a standing, open government committee with the authority to advise the Minister of Citizens’ Services. Such a committee may be able to offer more precise recommendations, and more regularly, for addressing issues volume that make timeliness (although focused on far too much) more prescient in the eyes of public bodies). It may also be able to comment on applicants’ perspectives—on how they formulate requests, respond to further inquiries about their request, etc.—in greater detail, which in the context of general (i.e., non-personal) FOI requests, is absent. The current all-party statutory special legislative committee to review the *Act* every six years is an insufficient forum to discuss *FOIPPA*’s operational affairs given successive governments have ignored its repeated recommendations.

⁴⁸ Seth F. Kreimer, “The Ecology of Transparency Reloaded,” in *Troubling Transparency*, ed. Michael Schudson and David E. Pozen (Columbia University Press, 2018), <https://go.exlibris.link/wSD2JFiH>.

Appendixes

Appendix A: List of public bodies

Appendix B: Requests sent to ministries

Appendix C: Requests sent to broader public sector organizations

Appendix D: List of recommendations

Appendix A: List of public bodies

All available release packages can be downloaded from FIPA's website at the following address: <https://fipa.bc.ca/access-assessment-release-packages/>

The following public bodies were included in this study:

Broader Public Sector

- [Provincial Agricultural Land Commission](#)
 - Package: [PAL – PS](#)
- [Board of Examiners \(Local Government Act\)](#)
 - Package: [BOE – PS](#)
- [British Columbia Arts Council](#)
 - Package: [BAC – PS](#)
- [British Columbia Emergency Health Services Authority](#)
 - Package: NA
- [British Columbia Housing Management Commission](#)
 - Package: [BCH – PS](#) (large file)
- [Innovate BC](#)
 - Package: [IBC – PS](#)
- [British Columbia Lottery Corporation](#)
 - Package: [BLC – PS](#) (large file)
- [British Columbia Pavilion Corporation](#)
 - Package: [BPC – PS](#)
- [British Columbia Securities Commission](#)
 - Package: [BSC – PS](#) (large file)
- [British Columbia Transit Corporation](#)
 - Package: [BTC – PS](#)
- [British Columbia Transportation Financing Authority](#)
 - Package: [TFA – PS](#)
- [Building Code Appeal Board](#)
 - Package: [BCA – PS](#)
- [Columbia Power Corporation](#)
 - Package: [CPC – PS](#)
- [Community Care and Assisted Living Appeal Board](#)
 - Package: [CAL – PS](#)
- [Community Living British Columbia](#)
 - Package: [CLB – PS](#)
- [Credit Union Deposit Insurance Corporation of British Columbia](#)
 - Package: [CUD – PS](#)
- [Destination British Columbia](#)
 - Package: [DBC – PS](#)
- [Environmental Appeal Board](#)
 - Package: [EAB – PS](#)
- [British Columbia Financial Services Authority](#)
 - Package: [FSA – PS](#)
- [Financial Services Tribunal](#)

- Package: [FST - PS](#)
- [First Peoples' Heritage, Language and Culture Council](#)
 - Package: [FPC - PS](#)
- [Forensic Psychiatric Services Commission](#)
 - Package: NA
- [Forest Appeals Commission](#)
 - Package: [FAC - PS](#)
- [Forest Practices Board](#)
 - Package: [FPB - PS](#)
- [Health Professions Review Board](#)
 - Package: [HPR - PS](#)
- [Hospital Appeal Board](#)
 - Package: [HAB - PS](#)
- [Independent Investigations Office](#)
 - Package: [IIO - PS](#)
- [Justice Institute of British Columbia](#)
 - Package: [JIB - PS](#)
- [Knowledge Network Corporation](#)
 - Package: [KNC - PS](#)
- [Medical Services Commission](#)
 - Package: [MSC - PS](#)
- [Oil and Gas Appeal Tribunal \(Energy Resource Appeal Tribunal\)](#)
 - Package: [ERT - PS](#)
- [Oil and Gas Commission](#)
 - Package: [BER - PS](#) (large file)
- [Patient Care and Quality Review Board Secretary](#)
 - Package: [PRB - PS](#)
- [Patient Care and Quality Review Board \(Vancouver Coastal\)](#)
 - Package: NA
- [Patient Care and Quality Review Board \(Fraser Valley\)](#)
 - Package: NA
- [Patient Care and Quality Review Board \(Island\)](#)
 - Package: NA
- [Patient Care and Quality Review Board \(Northern\)](#)
 - Package: NA
- [Patient Care and Quality Review Board \(Interior\)](#)
 - Package: NA
- [Patient Care and Quality Review Board \(PHSA\)](#)
 - Package: NA
- [Provincial Health Services Authority](#)
 - Package: [PHA-PS](#) (large file)
- [Royal British Columbia Museum](#)
 - Package: [RBC - PS](#)
- [Skilled Trades BC Appeal Board](#)
 - Package: [STB - PS](#)
- [Transportation Investment Corporation](#)
 - Package: [TIC - PS](#)

Core Government

- [Ministry of Agriculture and Food](#)
 - Package: [MAF - CG](#)
- [Ministry of Attorney General](#)
 - Package: [MAG - CG](#)
- [Ministry of Children and Family Development](#)
 - Package: [MCF - CG](#)
- [Ministry of Citizens' Services](#)
 - Package: [MCS - CG](#) (large file)
- [Ministry of Education and Child Care](#)
 - Package: [MEC - CG](#)
- [Ministry of Emergency Management and Climate Readiness](#)
 - Package: [MEM - CG](#)
- [Ministry of Energy, Mines and Low Carbon Innovation](#)
 - Package: [MEI - CG](#) (large file)
- [Ministry of Environment and Climate Change Strategy](#)
 - Package: [MCC - CG](#)
- [Ministry of Finance](#)
 - Package: [MFN - CG](#)
- [Ministry of Forests](#)
 - Package: [MFR - CG](#)
- [Ministry of Health](#)
 - Package: [MHT - CG](#) (large file)
- [Ministry of Housing](#)
 - Package: [MHG - CG](#)
- [Ministry of Indigenous Relations and Reconciliation](#)
 - Package: [MIR - CG](#)
- [Ministry of Jobs, Economic Development and Innovation](#)
 - Package: [MJE - CG](#)
- [Ministry of Labour](#)
 - Package: [MLR - CG](#)
- [Ministry of Mental Health and Addictions](#)
 - Package: [MMH - CG](#)
- [Ministry of Municipal Affairs](#)
 - Package: [MMA - CG](#)
- [Ministry of Office of the Premier](#)
 - Package: [OOP - CG](#)
- [Ministry of Post-Secondary Education and Future Skills](#)
 - Package: [MPE - CG](#)
- [Ministry of Public Safety and Solicitor General](#)
 - Package: [MPS - CG](#)
- [Ministry of Social Development and Poverty Reduction](#)
 - Package: [MSD - CG](#)
- [Ministry of Tourism, Arts, Culture and Sport](#)
 - Package: [MTA - CG](#)
- [Ministry of Transportation and Infrastructure](#)
 - Package: [MTI - CG](#)
- [Ministry of Water, Land and Resource Stewardship](#)
 - Package: [MWL - CG](#)

Appendix B: Requests sent to ministries

- 2024 BC Core Government Requests
 - <https://fipa.bc.ca/2024-bc-core-government-requests/>

Over a series of five requests, the following FOI records or information were sought from ministries :

1. current organizational charts that indicate freedom of information personnel and information management personnel (ARCS 105-02);
2. delegation of authority charts for the Freedom of Information and Protection of Privacy Act (ARCS 265-20);
3. policies or procedures regarding freedom of information (not privacy), including policies and procedures regarding the routine release of information and proactive disclosure, but excluding the FOIPPA Policy & Procedures Manual (ARCS 292-00, 292-27);
4. final reports regarding public-body-specific performance reporting, program evaluations, or project implementation plans or reviews with respect to freedom of information (ARCS 400-02, ARCS 400-10, ARCS 400-20, ARCS 400-40, ARCS 400-50, ARCS 440-02, ARCS 400-20);
5. delegation of authority charts for the Information Management Act, as applicable (ARCS 265-20);
6. interoffice memoranda about freedom of information and records/information management (ARCS 195-20, 195-45);
7. Metadata Application Profiles and Information Destruction Models, as well as associated policies and procedures and implementation plans and reports;
8. office of primary responsibility designations/matrices (ARCS 432-12);
9. technical manuals for records management systems;
10. file lists and indexes (ARCS 432-10);
11. final training packages and training implementation history files (excluding correspondence; ARCS 1735-25) for freedom to information and records/information management training;
12. ministry self-assessments for records/information management based on the frameworks provided by the Chief Records Officer;
13. the public body's policies and procedures regarding records/information management (ARCS 432-00);
14. the public body's Information Resource Management Plans; and
15. copies of licenses, contracts, and agreements between the public body and recordkeeping system service providers or contractors;

16. acceptable use of technology policies and procedures;
17. final job description files for any employee who regularly performs a role or responsibility in responding to a freedom of information request or fulfilling public body's records/information management program (ARCS 1360-20);
18. "documenting government decisions" policy instruments (where "instrument" has the same meaning as in TBD 1/23);
19. policies and procedures concerning incidents regarding sections 65.3 [Offence to willfully evade access provisions] and 30.3 [whistle-blower protection] of the Freedom of Information and Protection of Privacy Act;
20. final Requests for Proposals (and any attachments to those proposals) concerning records management/freedom of information (not privacy);
21. contracts and statements of work for consultant services for freedom of information related work (if more than one, please provide only the last five);
22. copies of records management ontologies/thesauri;
23. copies of checklists, forms, templates, guides and other tools used in relation to processing freedom of information requests (please include intranet files when responsive, by print PDF or screen capture if necessary);
24. records confirming the appointment and responsibilities of FOI Oversight Liaison Officers and Duty to Document Champions, or roles that perform a similar function if those titles are antiquated;
25. case management procedures for freedom of information requests;
26. onboarding manuals; and
27. the public body's duty to document readiness assessments (produced in Winter 2019).

Appendix C: Requests sent to broader public sector organizations

- 2024 BC Broader Public Sector Requests
 - <https://fipa.bc.ca/2024-bc-broader-public-sector-requests>

Over five requests, the following FOI records or information were sought from broader public sector organizations:

1. current organizational charts that indicate freedom of information personnel and information management personnel;
2. delegation of authority charts for the Freedom of Information and Protection of Privacy Act;
3. policies or procedures regarding freedom of information (not privacy), including policies and procedures regarding the routine release of information and proactive disclosure;
4. final reports regarding the public body's performance reporting, program evaluations, or project implementation plans or proposals with respect to freedom of information;
5. delegation of authority charts for the Information Management Act, as applicable;
6. interoffice memoranda about freedom of information and records/information management;
7. Metadata Application Profiles and records disposition models, as well associated policies and procedures and implementation plans and reports;
8. office of primary responsibility designations/matrices;
9. technical manuals for records management systems;
10. acceptable use of technology policy instruments (where "instrument" has the same meaning as in Treasury Board Directive 1/23 and onboarding manuals;
11. file plans/lists/indexes and/or records management ontologies/thesauri;
12. public body self-assessments and audits/evaluations of records/information management;
13. policy instruments regarding records or information management;
14. copies of record retention schedules;
15. the public body's information resources/information asset plans/records management plans, as applicable;
16. licenses, contracts, or agreements between the public body and recordkeeping system service providers or contractors;

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;
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);
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);
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;
21. internal surveys and the results of surveys concerning records/information management of freedom of information;
22. "documenting government decisions" policy instruments (where "instrument" has the same meaning as in Treasury Board Directive 1/23);
23. final Requests for Proposals concerning records management/freedom of information (not privacy);
24. copies of checklists, forms, templates, guides and other tools used in relation to processing freedom of information requests;
25. contracts and statements of work for consultant services for freedom of information/records management work;
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;
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);

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.);

Appendix D: List of recommendations

- 1. Research, writing, and formatting literacies need to be recovered.**
- 2. British Columbia needs a recordkeeping statute with a vision that serves the interests of government and the public, both today and in the future.**
- 3. Recordkeeping needs to become a core administrative imperative in the public sector.**
- 4. To start doing things differently, information professionals must be afforded greater respect.**
- 5. Correctness must replace timeliness.**
- 6. The “consultative committee” mentioned in section 67 of the *Act* should be established.**