Report on the Administration of the *Freedom of Information and Protection of Privacy Act*

2024/25

BRITISH COLUMBIA
Ministry of Citizens' Services

October 20, 2025

The Honourable Raj Chouhan
Speaker of the Legislative Assembly
Suite 207 Parliament Buildings
Victoria, B.C. V8V 1X4

Dear Mr. Speaker,

I am pleased to present this report on the administration of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) for the 2024/25 fiscal year.

The Ministry of Citizens' Services is committed to enhancing B.C.'s Freedom of Information (FOI) system so people have timely access to the information they need.

In particular, the Ministry is dedicated to improving service delivery for applicants seeking personal information, particularly those requesting information about their involvement with the Ministry of Children and Family Development. This report will highlight this distinct category of access request.

We are also continuing to invest in best-in-class digital tools to streamline the FOI process and enhance efficiency and service quality.

I would like to express my appreciation to all the dedicated people across the public service who are committed to enhancing access to information and the protection of privacy.

Sincerely,

Honourable Diana Gibson
Minister of Citizens' Services

pc: Kate Ryan-Lloyd
Clerk of the Legislative Assembly
Legislative Assembly of British Columbia

TABLE OF CONTENTS

INTRODUCTION **4**

ACCESS TO INFORMATION **5**

2024/25 Access to Information Highlights 5

Access to Information Key Performance Indicators 6

PRIVACY PROTECTION **10**

2024/25 Privacy Protection Highlights 10

Privacy Protection Key Performance Indicators 11

APPENDIX **13**

INTRODUCTION

B.C.'s *Freedom of Information and Protection of Privacy Act* (FOIPPA) balances the public's right to access information with an individual's right to privacy. The Act has two main purposes:

- To make ministries more open and accountable by providing people with a legislated right of access to government information, including their own personal information, subject to reasonable exceptions.
- To protect personal privacy by prohibiting the unauthorized collection, use, disclosure, access or storage of personal information by ministries.

The Ministry of Citizens' Services is responsible for supporting all ministries to fulfill their legal obligations under FOIPPA and supporting applicants throughout the Freedom of Information (FOI) request process.

The Ministry of Citizens' Service also plays a key role in helping all ministries effectively manage privacy risks and safeguard personal information. This includes promoting best practices and offering guidance, training, and support on privacy management.

ACCESS TO INFORMATION

FOIPPA promotes openness and transparency in government by giving anyone the right to request access to records held by ministries, subject to certain exceptions. In addition to facilitating access through formal requests, FOIPPA also requires ministries to proactively disclose certain types of information to the public, without the need for a formal FOI request.

2024/25 Access to Information Highlights

FOI Modernization Project Update

The 2024/25 fiscal year was the fourth of a five-year, $8.2-million commitment to modernize FOI processes and systems. The FOI Modernization Project's focus for the coming year is to finalize the implementation of a unified FOI software system, automating processes and supporting consistency across ministries to reduce the average time it takes to process and respond to an FOI request.

MCFD FOI Service Delivery Project Update

The Ministry of Children and Family Development (MCFD) receives the highest volume of personal requests of any ministry — over 2,000 requests each year. These requests often come from people seeking access to information involving major life events such as adoption, child protection, and foster care.

In addition to the high number of requests, the volume of pages associated with these requests and the complexity of information involved are substantial. These requests often contain some of the most sensitive personal information held by government and must be thoroughly reviewed by access professionals navigating privacy protection, complex legislation, and challenges related to aging physical records.

The Ministry of Citizens' Services continues to work in partnership with MCFD to prioritize responding to these requests. Together the ministries are working to develop longer-term solutions that better address the access to information needs of former and current MCFD clients.

Access to Information Key Performance Indicators

For clarity, this report distinguishes between access requests made under FOIPPA:

- **FOI Requests** includes general requests, relating to the operations and administration of government. It also refers to personal requests which relate to employment, disability, or correctional services.
- **MCFD Personal Requests** are those specifically related to requests from MCFD clients for personal information, including requests related to current and former children in care and adoptees. These requests involve review under both FOIPPA and other legislation such as the *Child, Family and Community Service Act and the Adoptions Act*. This information is highly sensitive and personal in nature.

Aggregate statistics for all requests made under FOIPPA can be found in the appendix.

Requests Received and Closed

6,818 *access requests were closed in the 2024/25 fiscal year.*

Requests are recorded as "received" in the fiscal year in which they are opened for processing. "Closed" requests includes all requests closed in the reported fiscal year.

Number of FOI requests received

Year	FOI Requests Received	MCFD Personal Requests Received
2020/21	8,347	1,858
2021/22	7,274	2,056
2022/23	4,997	2,016
2023/24	5,520	2,278
2024/25	4,691	2,372

Number of FOI requests closed

Year	FOI Requests Closed	FOI Pages Processed	MCFD Personal Requests Closed	MCFD Personal Pages Processed
2020/21	9,127	803,425	1,713	841,505
2021/22	7,554	771,610	2,095	1,206,147
2022/23	5,304	934,442	2,107	1,600,154
2023/24	5,312	855,443	1,889	1,146,759
2024/25	4,840	1,089,986	1,978	1,087,671

Requests Closed On Time

*In the 2024/25 fiscal year, **72%** of MCFD personal requests were closed on time, while **85%** of FOI requests were closed on time.*

Ministries must respond to an FOI request within 30 business days. FOIPPA provides for the ability to extend this time if certain conditions apply, or with the permission of the Information and Privacy Commissioner.

On-time percentage

Year	FOI Requests	MCFD Personal Requests
2020/21	86%	77%
2021/22	83%	72%
2022/23	81%	70%
2023/24	85%	81%
2024/25	85%	72%

Average processing days

Year	FOI Requests	MCFD Personal Requests
2020/21	50	99
2021/22	50	120
2022/23	60	148
2023/24	45	97
2024/25	43	121

MCFD Personal Request Complexity

Personal requests associated with the Ministry of Children and Family development (MCFD) present unique challenges to review and process. The records in these requests can impact major life decisions and detail personal histories of adoption and/or a child's time in care. These requests contain sensitive personal information and require complex analytical work to ensure protection of third-party information. These challenges are exacerbated by the overall volume of MCFD personal requests: MCFD personal requests represent 52% of all personal FOI requests and 34% of all general and personal requests received in 2024/25.

The number of requests received each year has increased by nearly 30% since 2020/21. This increase, combined with the volume and complexity of the material involved, has added to the pressure faced by the ministry in closing each request within the legislated timelines, with the average open overdue request being over 2,300 pages.

Number of overdue MCFD personal requests and pages

Year	Open Overdue Files	Overdue Pages
2020/21	561	1.07m
2021/22	585	1.54m
2022/23	430	1.22m
2023/24	653	1.65m
2024/25	984	2.19m

On-time percentage and processing time for MCFD personal requests in FY2024/25

File Size (in pages)	Files Closed 2024/25	Average Processing Days	On-Time Percentage
0-499	1494	37	88%
500-999	164	115	56%
1000-1999	174	476	6%
2000-3999	106	527	5%
4000+	40	651	5%

Proactive Disclosures Published

In the 2024/25 fiscal year, ministries published 3,592 proactive disclosures under seventeen mandatory directives.

Proactive disclosure is the release of government information to the public without a formal FOI request. The practice of disclosing information on a proactive basis is an important way for government to improve access to information, transparency, and accountability.

Section 71.1 of FOIPPA allows the Minister responsible for the Act to establish categories of records that ministries must proactively disclose and to issue directions that detail those disclosures. In 2016/2017 fiscal year there were eight directives. Since then, nine new directives were added. There are now 17 categories of records that are proactively released to the public. Examples of categories include Corporate Transition Binders as well as Estimates Notes.

Ministries also disclose a great deal of information through online repositories and interactive tools such as BC Data Catalogue, DriveBC, and the BC Economic Atlas.

Number of proactive disclosures published under directives

Year	Proactive Disclosures
2020/21	3,521
2021/22	3,305
2022/23	4,511
2023/24	4,176
2024/25	3,592

PRIVACY PROTECTION

FOIPPA establishes a framework to protect individuals' personal information by setting clear authorities for the collection, use, and disclosure of personal information by ministries. FOIPPA also sets out provisions to protect personal information from unauthorized access, use, or disclosure. This includes requiring ministries to implement appropriate security measures to safeguard sensitive data. In the event of a privacy breach, ministries are required to assess the impact and notify individuals affected by the breach when necessary.

2024/25 Privacy Protection Highlights

Responsible Use of Artificial Intelligence (AI)

The BC Government is committed to responsibly using and implementing AI to ensure efficiency, fairness, and improved public services. Responsible use of AI in BC is guided by policy, regulation, and a strong privacy and security framework.

In the 2024/25 fiscal year, the ministry:

- Updated guiding principles and generative AI guidance.
- Created a public AI website with information on AI awareness, responsible use guidelines, and examples of how AI is being used.

Privacy Protection Training

Ensuring government employees are trained in information management is critical to managing and protecting the personal information entrusted to government. This is done, in part, by requiring every government employee to take a comprehensive information management course which focuses on privacy, information security, access, and records management (Information Management 117 – IM117).

This training is mandatory every two years to ensure that employees stay up-to-date with recommended practices and legislative and policy requirements.

In the 2024/25 fiscal year, 91% of B.C. Government employees had completed the training.

Privacy Protection Key Performance Indicators

Privacy Impact Assessments Completed

*In the 2024/25 fiscal year, ministries completed **1,008** Privacy Impact Assessments.*

A Privacy Impact Assessment (PIA) evaluates how a current or proposed government initiative will impact the personal privacy of any individual whose information is collected, used, or disclosed. A PIA identifies potential privacy risks and ensures that measures are in place to protect personal information.

Number of Privacy Impact Assessments completed

Year	Privacy Impact Assessments Completed
2020/21	972
2021/22	1,056
2022/23	945
2023/24	1,214
2024/25	1,008

Privacy Breaches Reported

In the 2024/25 fiscal year, the majority of privacy breaches were categorized as having a negligible risk to individuals or government.

The Information Incident Management Policy requires that any BC Public Service employee who becomes aware of an actual or suspected information incident must report it to the Ministry of Citizens' Services. Investigators assess each reported case to determine whether a violation of FOIPPA has occurred and to identify the factors that may have contributed to the incident or privacy breach. Each incident is then evaluated and categorized using a five-tier system, with the assigned tier reflecting the potential harm, sensitivity, and the type of information involved.

Privacy breaches

	2020/21	2021/22	2022/23	2023/24	2024/25
Reported	1,978	2,487	3,114	4,025	6,186
Investigations conducted	1,621	2,043	2,556	3,991	5,749
Confirmed privacy breaches	1,455	1,897	2,439	3,923	5,641
Instances where breach notification required (% of violations)	124 (8.5%)	100 (5.3%)	116 (4.8%)	25 (0.6%)	20 (0.4%)

Number of privacy breaches by tier

Tier level	2020/21	2021/22	2022/23	2023/24	2024/25
Tier 1: Minor incidents involving personal or confidential information with negligible risk of harm to individuals or government.	1,369	1,825	2,128	3,756	5,529
Tier 2: Moderately complex incidents involving personal or confidential information with low to moderate risk of harm to individuals or government.	247	254	349	175	160
Tier 3: Moderate/major incidents/complaints involving personal or confidential information with higher potential for harm to involved parties, inappropriate conduct and jeopardy for individuals.	113	84	109	94	87
Tier 4: Major/complex and/or high-profile incidents involving highly sensitive personal or confidential information and potential for harm to large number of individuals, may impact public confidence in a ministry or government.	0	0	0	0	1
Tier 5: Major incidents requiring the involvement of an external investigator due to an actual or perceived conflict of interest.	0	0	0	0	0

APPENDIX

Access Requests by Type

- **FOI Requests** relate to the operations and administration of government and personal requests relating to employment, disability, or correctional services.
- **MCFD Personal Requests** relate to requests from MCFD clients for personal information, including requests related to current and former children in care and adoptees.

Number of access requests received by type of request

Year	FOI Requests	MCFD Personal Requests
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2023/24	5,520	2,278
2024/25	4,691	2,372

Number of FOI requests closed by type of request

Year	FOI Requests	MCFD Personal Requests
2020/21	7,149	1,713
2021/22	5,459	2,095
2022/23	3,301	2,107
2023/24	3,238	1,889
2024/25	2,629	1,978

On-time percentage by type of request

Year	FOI Requests	MCFD Personal Requests
2020/21	86%	77%
2021/22	83%	72%
2022/23	81%	70%
2023/24	85%	81%
2024/25	85%	72%

Average processing days by type of request

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2020/21	50	99
2021/22	50	120
2022/23	60	148
2023/24	45	97
2024/25	43	121

Pages processed by type of request

Year	FOI Requests	MCFD Personal Requests
2020/21	803,425	841,441
2021/22	771,610	1,206,764
2022/23	934,442	1,600,534
2023/24	855,443	1,157,992
2024/25	1,089,986	1,087,671

Average number of pages by type of request

Year	FOI Requests	MCFD Personal Requests
2020/21	159	638
2021/22	161	704
2022/23	275	941
2023/24	269	798
2024/25	366	705

Disposition of Access Requests

Closed FOI requests by disposition

Year	Partial disclosure	Full disclosure	No records responses	Access denied [1]	Transferred [2]	Abandoned/ Withdrawn	All other dispositions [3]
2020/21	3,918	1,037	2,102	184	224	1,502	160
2021/22	3,900	1,020	1,191	153	394	763	133
2022/23	2,606	709	712	109	361	714	93
2023/24	2,406	661	870	149	348	711	167
2024/25	2,237	572	698	72	346	743	172

[1] *Includes Access Denied, Access Denied – Section 20, and Access Denied – Section 43*

[2] *Includes Records in Another Minister/Org responses*

[3] *Inclusive of Cancelled, Opened in Error, Outside Scope of Act, Refuse to Confirm or Deny, and Routinely Releasable responses*

Closed MCFD Personal requests by disposition

Year	Partial disclosure	Full disclosure	No records responses	Access denied [1]	Transferred [2]	Abandoned/ Withdrawn	All other dispositions [3]
2020/21	1,195	19	69	78	2	269	82
2021/22	1,575	17	97	32	0	306	70
2022/23	1,372	18	122	45	1	488	62
2023/24	1,290	26	127	25	3	323	95
2024/25	1,382	16	143	23	0	269	142

[1] *Includes Access Denied, Access Denied – Section 20, and Access Denied – Section 43*

[2] *Includes Records in Another Minister/Org responses*

[3] *Inclusive of Cancelled, Opened in Error, Outside Scope of Act, Refuse to Confirm or Deny, and Routinely Releasable responses*

Access Requests Received by Ministry

	General	Personal
Agriculture and Food	36	0
Attorney General	80	36
Children and Family Development	41	2387
Citizens' Services	47	10
Education and Child Care	85	29
Emergency Management and Climate Readiness	37	3
Energy and Climate Solutions	22	0
Energy, Mines and Low Carbon Innovation	73	0
Environment and Parks	312	8
Finance	179	413
Forests	197	9
Health	230	42
Housing and Municipal Affairs	96	6
Indigenous Relations and Reconciliation	55	2
Infrastructure	13	1
Jobs, Economic Development and Innovation	27	1
Labour	33	11
Mental Health and Addictions	20	0
Mining and Critical Minerals	23	0
Municipal Affairs	37	7
Office of the Premier	75	5
Post-Secondary Education and Future Skills	49	13
Public Safety and Solicitor General	159	675
Social Development and Poverty Reduction	34	909
Tourism, Arts, Culture and Sport	38	2
Transportation and Transit	227	14
Water, Land and Resource Stewardship	247	8
TOTAL	**2472**	**4591**

Fees for Access to Information

FOIPPA enables ministries to charge a fee for aspects of an FOI request. In addition to fees related to processing requests, such as locating and retrieving records or producing records. Fees are only applicable to General requests.

	2020/21	2021/22	2022/23	2023/24	2024/25
Application Fees Paid	--	$11,950[1]	$26,930	$29,650	$22,590
Processing Fees Paid (nearest thousand)	$51,000	$50,000	$53,000	$54,000	$70,000
Number of Requests Where Processing Fees Paid	144	143	171	192	214

[1] A $10 application fee for general requests was introduced in November 2021. The value reported for 2021/22 reflects 4 months of reporting

Aggregate Access Requests

Number of access requests received and closed by government

Year	Received – All	Closed – All	Pages Processed – All
2020/21	10,205	10,840	1,644,866
2021/22	9,346	9,651	1,978,374
2022/23	7,017	7,412	2,534,976
2023/24	7,798	7,201	2,013,435
2024/25	7,063	6,818	2,177,657

Government on-time percentage and average processing days

Year	On-Time Percentage - All	Average Processing Days – All
2020/21	85%	57
2021/22	81%	65
2022/23	78%	85
2023/24	84%	59
2024/25	81%	65