



BC SERVICES CARD DIRECTION

TO: THE PROVINCIAL IDENTITY INFORMATION SERVICES PROVIDER

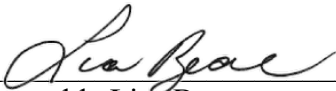
DIRECTION: 1/12

SUBJECT: Direction respecting the BC Services Card and related personal identity information

AUTHORITY: This direction is issued under section 69.2 (3) of the *Freedom of Information and Protection of Privacy Act*

APPLICATION: This direction applies to the Ministry of Citizens' Services as the designated Provincial Identity Information Services Provider for the Province of British Columbia under section 69.2 (1) of the *Freedom of Information and Protection of Privacy Act*

EFFECTIVE DATE: September 21, 2022



Honourable Lisa Beare
Minister of Citizens' Services

Minister of Citizens' Services
Direction to the Provincial Identity Information Services Provider
issued under Section 69.2 (3) of the
Freedom of Information and Protection of Privacy Act

I, Lisa Beare, Minister of Citizens' Services, issue the following direction to the Provincial Identity Information Services Provider under section 69.2 (3) of the *Freedom of Information and Protection of Privacy Act*, R.S.B.C. 1996 c. 165 ("FOIPPA"). This direction amends the direction issued on July 2, 2021.

A. Definitions

In this direction:

"agent" means the Insurance Corporation of British Columbia (ICBC), a government agent, or a person who is authorized in writing by ICBC to provide identity proofing services.

"cardholder" means an individual who has been issued a BC Services Card physical credential.

"credential" means a physical or electronic identifier that is issued to an individual, attests to the truth of certain stated facts, and is used to authenticate the identity of the individual.

"eligible entity" means a government institution subject to the *Privacy Act* (Canada).

"personal identity information" means any personal information of a type that is commonly used, alone or in combination with other information, to identify or purport to identify an individual.

"public body" means a public body as defined in FOIPPA.

B. BC Services Card Direction

Under section 69.2 (3) (b) of FOIPPA, the Provincial Identity Information Services Provider is directed to:

1. Establish a program to issue the BC Services Card.
2. Issue the BC Services Card that can be used to authenticate the cardholder when accessing services.
3. Permit individuals who already have a BC driver's licence, or who are applying for a BC driver's licence, to combine their BC Services Card with their BC driver's licence, subject to limited and specified exceptions.

4. Collaborate with the Insurance Corporation of British Columbia to establish the rules for eligibility, format, issuance and cancellation of the combined BC driver's licence and BC Services Card.
5. Issue other versions of the BC Services Card (in addition to the combined BC driver's licence and BC Services Card), including:
 - a. a standalone BC Services Card with a photograph of the individual (photo BC Services Card) and a level of identity assurance consistent with a BC driver's licence for individuals who do not have a BC driver's licence or who choose not to combine their BC Services Card with their BC driver's licence; and
 - b. a BC Services Card without a photograph of the individual (non-photo BC Services Card) and a lower level of identity assurance for minors and adults who, for reasons such as infirmity or lack of required identity documents, cannot meet the identity proofing standards required by this direction.
6. Issue to the cardholder, a BC Services Card electronic credential with a high level of identity assurance, that enables the cardholder to access online services, subject to limited and specified exceptions.
7. For individuals that do not meet the eligibility requirements of enrollment or renewal of enrollment in the Medical Services Plan, issue an electronic credential with a high level of identity assurance, that enables individuals to access online services, subject to limited and specified exceptions.
8. Establish policies, standards, and processes to govern the lifecycle of the BC Services Card including:
 - a. issuance, replacement, and renewal;
 - b. management;
 - c. suspension and cancellation; and
 - d. manufacturing, activation, authentication, deactivation, and expiry.
9. Enter into agreements, as necessary, with the Insurance Corporation of British Columbia and other public bodies to perform services related to the issuance of the BC Services Card.

C. Identity Proofing Direction

Under section 69.2 (3) (a) and (b) of FOIPPA, the Provincial Identity Information Services Provider is directed to implement the following identity proofing standards:

1. In issuing a new, renewed, or replacement combined BC driver's licence and BC Services Card, the Insurance Corporation of British Columbia's identity proofing standards for issuing a BC driver's licence will apply except where noted in Schedule A.

2. In issuing a new photo BC Services Card, or renewing, replacing, changing, or correcting personal information on it after card expiry or less than six months before card expiry, the Provincial Identity Information Services Provider must require the individual to:
 - a. attend in person before an agent of the Provincial Identity Information Services Provider where the individual's photograph will be taken and the individual's signature will be obtained; and,
 - b. present two pieces of identification described in the attached Schedule A tables as long as they are not from the same issuing authority, of which at least one piece of identification is described in Table 1 (Accepted Primary Identification).
3. The Provincial Identity Information Services Provider must require that the identification presented under Direction C2(b) above be provided in accordance with the conditions described in each of the tables set out in the attached Schedule A and also in accordance with the following conditions:
 - a. each piece of identification presented to the agent must be an original or a true copy of the original, certified by the issuing agency;
 - b. a single piece of identification from Table 1 (Accepted Primary Identification) cannot be used as both a piece of identification from Table 1 (Accepted Primary Identification) and Table 2 (Accepted Secondary Identification);
 - c. the identification documents from Table 1 (*Accepted Primary Identification*) cannot be expired, unless otherwise noted in the table; and,
 - d. the identification documents from Table 2 (*Accepted Secondary Identification*) may be expired for up to one year, unless otherwise noted in the table.
4. The Provincial Identity Information Services Provider may issue a replacement photo BC Services Card more than 6 months before card expiry under the following conditions:
 - a. the card is deemed to have been lost or stolen; or,
 - b. the card holder's personal information has changed or been corrected.
5. In issuing a replacement photo BC Services Card more than 6 months before card expiry, the Provincial Identity Information Services Provider must require the individual to follow the same process as for renewing as set out in Direction C2, unless the individual is unable to present the required identification.

In this case, the Provincial Identity Information Services Provider may allow the agent to match the individual to their previous photograph on record and confirm relevant information.

6. The Provincial Identity Information Services Provider must require an individual to present additional evidence where the individual's name has changed (or is different from the name shown on the presented identification). Required evidence to provide proof of a name change is set out in the attached Schedule B. Each presented name change document must be an original or a true copy of the original, certified by the issuing agency.
7. In issuing a new, renewed or replacement non-photo BC Services Card, the Provincial Identity Information Services Provider may accept a lower level of identity assurance and may waive one or more of the identity proofing standards listed in Directions C2, C3 and C6, above.

Issuing BC Services Card Electronic Credential

8. Subject to Direction C1, and C2 above, to activate a BC Services Card electronic credential for online services, the Provincial Identity Information Services Provider must require the cardholder to:
 - a. present their BC Services Card before the Provincial Identity Information Services Provider:
 - i. in person or online; and,
 - ii. if online, take and submit a digital photo of themselves.
9. Respecting Direction C7 above, for non- photo BC Services cardholders, to activate a BC Services Card electronic credential for online services, the Provincial Identity Information Services Provider must require the cardholder to:
 - a. present their BC Services Card before the Provincial Identity Information Services Provider:
 - i. in person or online;
 - ii. if online, take and submit a digital photo of themselves; and,
 - iii. present two pieces of identification described in the attached Schedule A Table 1, where:
 - a) the two pieces of identification are not from the same issuing authority;
 - b) at least one piece of identification comprises a photograph of the individual; and,
 - c) if the primary identification presented does not comprise a photograph of the individual, the acceptable secondary identification is limited to the following:
 - a) Driver's licence or identity card (Canadian or U.S.)
 - b) Health card issued by a Canadian province or territory with photo
 - c) Passport (Foreign passports, including U.S. passport card)
 - d) NEXUS card.

10. Subject to C8 and C9 above, to activate the electronic credential on additional devices a cardholder must present their BC Services Card before the Provincial Identity Information Services Provider:

- i. online, and,
- ii. authenticate their identity using their existing BC Services Card electronic credential.

Issuing an Electronic Credential for Individuals who do not hold a BC Services Card

11. For individuals that do not have a BC Services Card (as referenced in Direction B7), to issue an electronic credential for online services, the Provincial Identity Information Services Provider must require the individual to:

- a. take and submit a digital photo of themselves; and
- b. take and submit a digital copy of two pieces of identification described in the attached Schedule A Table 1, where:
 - i. the two pieces of identification are not from the same issuing authority;
 - ii. at least one piece of identification comprises a photograph of the individual; and,
 - iii. if the primary identification presented does not comprise a photograph of the individual, the acceptable secondary identification is limited to the following:
 - a) Driver's licence or identity card (Canadian or U.S.)
 - b) Health card issued by a Canadian province or territory with photo
 - c) Passport (Foreign passports, including U.S. passport card)
 - d) NEXUS card.

12. The Provincial Identity Information Services Provider must require that the identification presented under Direction C11 above be provided in accordance with the conditions described in each of the tables set out in the attached Schedule A and also in accordance with the following conditions:

- a. each piece of identification presented to the agent must be an original or a true copy of the original, certified by the issuing agency; and,
- b. the identification documents cannot be expired.

D. Personal Identity Information Direction

Under section 69.2 (3) (a) of FOIPPA, the Provincial Identity Information Services Provider is directed to include the following personal identity information on the BC Services Card, subject to the stated conditions:

1. The combined BC driver's licence and BC Services Card will contain the same personal identity information as the BC driver's licence.
2. A photo BC Services Card must contain an issued and expiry date and the cardholder's:
 - name;
 - sex;
 - address;
 - date of birth;
 - photograph; and,
 - signature.
3. A non-photo BC Services Card must contain an issued and expiry date and the cardholder's:
 - name;
 - sex;
 - address (unless an exception applies); and,
 - date of birth.
4. The Provincial Identity Information Services Provider may enter into an agreement with the Ministry of Health to print an individual's Personal Health Number on the back of the BC Services Card.

E. Direction on Privacy and Security of Personal Identity Information

Under section 69.2 (3) (c) of FOIPPA, the Provincial Identity Information Services Provider is directed to protect the privacy and security of the personal identity information in its custody or under its control. This includes but is not limited to:

1. Ensuring, through contractual or other means, that personal identity information is protected, as required by Part 3 of FOIPPA, by any service provider or other agent that provides services on behalf of the Provincial Identity Information Services Provider.
2. Ensuring that all personal identity information sharing with third parties is legally authorized and governed by Information Sharing Agreements.
3. Informing cardholders and individuals of best practices for protecting their BC Services Card, electronic credentials and personal information, as well as measures for reducing the potential for identity fraud.
4. Completing a Security Threat and Risk Assessment on the personal identity information services it provides and providing a copy of that assessment to the Chief Information

Security Officer with the Office of the Chief Information Officer (OCIO) for review and comment, prior to the implementation of its services.

- a. The Security Threat and Risk Assessment must be updated on an annual basis or prior to a significant change to one of the services. A copy of the updated assessment must be provided to the OCIO's Chief Information Security Officer for review and comment.
5. Completing a Privacy Impact Assessment on the personal identity information services it provides during the development of the service and providing a copy of that assessment to the Corporate Information and Records Management Office (CIRMO) for review and comment.
 - a. The Privacy Impact Assessment must be updated on an annual basis or prior to a significant change to one of the services that involves the collection, use, storage, or disclosure of personal information. A copy of the updated assessment must be provided to the CIRMO for review and comment.
 - b. The Provincial Identity Information Services Provider must also provide, through the CIRMO, a summary or copy of the Privacy Impact Assessment and a summary or copy of any updates to the assessment to the Information and Privacy Commissioner for British Columbia for review and comment.
 6. Immediately deactivating a BC Services Card, where the card is reported lost, stolen, or damaged, or where the identity information on the card has been confirmed to be fraudulent or compromised. Where practicable, the Provincial Identity Information Services Provider should also make reasonable efforts to recover the card.
 7. Ensuring that all BC Services Card program employees, service providers and other agents who are responsible for handling personal identity information are made aware of their responsibilities to protect personal identity information and have received training on protecting personal identity information.
 8. Establishing policies, processes, and controls to limit access to the personal identity information stored in the personal identity information service.
 9. Establishing policies and processes for auditing the use of, and access to, the personal identity information service.
 10. With respect to records or logs that record the use of the BC Services Card and electronic credentials:
 - a. limiting the personal information that is recorded when a BC Services Card or electronic credential is used to access a service to the minimum information necessary for the effective operation of the Provincial Identity Information Services Provider, so as to prevent the creation of long-term, detailed records;

- b. ensuring that the information recorded about the service accessed is of a sufficiently general nature so as to not unnecessarily reveal information about a sensitive or personal transaction;
 - c. ensuring that the personal information recorded in a usage log is only used to support the service, address technical problems, and investigate a security or privacy incident or a case of suspected fraud; and,
 - d. ensuring that the information recorded about which service was accessed is not retained for longer than 30 days unless the information is necessary for a privacy, security, or fraud investigation.
11. Establishing policies and processes for identifying, reporting, and managing actual or suspected instances of identity fraud.
12. Immediately reporting an actual or suspected information incident to CIRMO and following all policies and processes CIRMO may set out.

F. Other Directions

Under section 69.2 (3) (e) of FOIPPA, the Provincial Identity Information Services Provider is directed to establish policies and processes for how a public body, or an eligible entity registers to use the personal identity information service.

Schedule A: Required Identification Documents

TABLE 1 Accepted Primary Identification

Type of identification	Conditions
BC driver's licence or learner's licence	<ul style="list-style-type: none"> • Must include the individual's name, photograph and signature • Accepted up to three years after the expiry date on the licence • Not accepted as primary identification if the individual last used a study, work, visitor, or temporary-resident permit as primary identification to obtain the BC driver's licence or the BC learner's licence
BC driver's licence and BC Services Card (combined)	<ul style="list-style-type: none"> • Must include the individual's name, photograph and signature • Accepted up to three years after the expiry date on the card • Can only be used as one piece of identification
BC identification card (BCID)	<ul style="list-style-type: none"> • Accepted up to three years after the expiry date on the card • Older BCID cards without an expiry date are not accepted • Not accepted as primary identification if the individual last used a study, work, visitor, or temporary-resident permit as primary identification to obtain the BCID
BC Services Card (photo)	<ul style="list-style-type: none"> • Must include the individual's name, photograph and signature • Accepted up to three years after the expiry date on the card
Canadian birth certificate	<p>Documents that are not accepted include:</p> <ul style="list-style-type: none"> • baptismal certificates • certificates of live birth • Quebec birth certificates issued <i>before</i> 1994 • Manitoba birth certificates issued by a "division registrar" • Ontario Long Form Birth Certificates • Canadian Registration of Birth Abroad certificates • DND birth certificate (DND 419)
Canadian citizenship card or certificate (letter format)	<ul style="list-style-type: none"> • The <i>commemorative sheet</i> that comes with a citizenship card or certificate is not accepted

Type of identification	Conditions
	<ul style="list-style-type: none"> • Citizenship certificates issued on or after Feb. 1, 2012 are accepted only when successfully validated through Immigration, Refugees and Citizenship Canada.
Canadian passport	<ul style="list-style-type: none"> • Not accepted if expired • The individual must confirm the name shown in their passport is exactly how it appears on their foundation document (Canadian birth certificate or Canadian immigration document that is accepted in Schedule A: Table 1), or as changed through a vital statistics agency • If the name is different, appropriate linking documents are required • Temporary passports are not accepted
Canadian permanent resident card (previously Canadian Record of Landing)	<ul style="list-style-type: none"> • Not accepted if expired • Confirmation of Permanent Residence, IMM5292 or IMM5688, is not accepted • Canadian Record of Landing is not accepted if the individual has previously presented a permanent resident card, passport or citizenship document
Canadian immigration identification document	<ul style="list-style-type: none"> • Study, work, visitor or temporary resident permit documented in Form IMM1442 issued by Immigration, Refugees and Citizenship Canada • Not accepted if the individual has previously presented a permanent resident card, passport or citizenship document
Identity card	<ul style="list-style-type: none"> • Issued to foreign representatives accredited by the department of Global Affairs Canada • Not accepted if expired
Secure Certificate of Indian Status	<ul style="list-style-type: none"> • Accepted only if laser-etched card issued by Indian and Northern Affairs Canada

TABLE 2 Accepted Secondary Identification

Type of identification	Conditions
Bank card	<ul style="list-style-type: none"> • The individual’s name must be printed on the card by the issuer • Must include the individual’s signature
BC Services Card (non-photo)	<ul style="list-style-type: none"> • The individual’s name must be printed on the card by the issuer
Birth certificate from foreign country	
Canadian Forces ID	<ul style="list-style-type: none"> • Must include the individual’s name, photograph and signature
Certificate of Indian Status or Native Status Card	<ul style="list-style-type: none"> • Must include the individual’s name, photograph and signature
Credit card	<ul style="list-style-type: none"> • The individual’s name must be printed on the card by the issuer • Must include the individual’s signature
Department of National Defense 404 Driver Licence	<ul style="list-style-type: none"> • Must include the individual’s name, photograph and signature
Driver's licence or identity card issued by a Canadian province or territory or U.S. state	<ul style="list-style-type: none"> • Must include the individual’s name, photograph and signature
Employee ID card with photo	<ul style="list-style-type: none"> • Must include the individual’s name and signature and/or photograph
Health card issued by a Canadian province or territory	<ul style="list-style-type: none"> • Must include the individual’s name, photograph and/or signature
NEXUS card	<ul style="list-style-type: none"> • Must include the individual’s name and photograph
Parole Certificate ID or Correctional service conditional release card	<ul style="list-style-type: none"> • Issued by federal or provincial governments
Passport (Foreign passports, including U.S. passport card)	<ul style="list-style-type: none"> • Not accepted if expired

Type of identification	Conditions
Pleasure Craft Operator Card	<ul style="list-style-type: none"> • Must be issued by Transport Canada • Must include the individual's name and signature
Police identification	
Possession and Acquisition Licence (PAL)	
Secondary ID Attestation form	<ul style="list-style-type: none"> • Must be issued by ICBC or the BC Ministry of Social Development and Poverty Reduction • Must be validated by ICBC • Not accepted if expired
Social insurance card	<ul style="list-style-type: none"> • Must include the individual's name and signature. Newer cards without a signature are not accepted
Student card (school ID)	<ul style="list-style-type: none"> • Must include the individual's name and photograph

Schedule B: Required Evidence of a Name Change

1. If an individual's name has changed, or changed more than once, they must present linking documents that connect *each* change of name, unless such linking documents were previously presented to and recorded by an agent. Accepted linking documents include:
 - a. a marriage certificate,
 - b. a name change certificate;
 - c. a divorce certificate that includes both the individual's married name and the individual's previous name; or
 - d. a court order stamped by the court registry.

2. If an individual assumed a name through marriage, and wishes to resume the name listed on their primary identification document listed in Table 1, Schedule A that is either:
 - a. a Canadian birth certificate; or,
 - b. a valid immigration document or card issued by the Government of Canada,then the individual must present that document as evidence. A linking document would not be required.