



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: **January 24, 2020**

A handwritten signature in black ink, appearing to read "S. Robinson", enclosed in a faint rectangular box.

Honourable Selina Robinson
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, Selina Robinson, 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 and replaces the direction issued on February 20, 2018.

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;

"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 with an integrated circuit chip that can be used to authenticate the cardholder when accessing in-person and online 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 services card.
5. Issue other versions of the BC services card (in addition to the combined BC driver's licence and services card), including:

- a. a standalone BC services card with a photograph of the cardholder (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 cardholder (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. Establish policies, standards and processes to govern the lifecycle of the BC services card and the integrated circuit chip including:
 - a. card issuance, replacement and renewal;
 - b. card management;
 - c. card suspension and cancellation; and
 - d. chip manufacturing, activation, authentication and deactivation.
7. 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 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.

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 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 of best practices for protecting their card, personal information and passcode, 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 copy of the Privacy Impact Assessment and 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. 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 BC services card identity information service.
9. Establishing policies and processes for auditing the use of, and access to, the BC services card identity information service.
10. With respect to records or logs that record the use of the BC services card:
 - a. limiting the personal information that is recorded when a BC services card 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 BC services card identity information service.

Schedule A: Required Identification Documents

TABLE 1 Accepted Primary Identification

The following documents are accepted as primary identification, except where noted:

Type of identification	CONDITIONS
BC driver's licence or learner's licence	<ul style="list-style-type: none"> • Must include the individual's photograph and signature • Accepted as primary identification up to three years after the expiry date on the licence • Not accepted as primary identification if the individual last used a student, 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 services card (combined)	<ul style="list-style-type: none"> • Must include the individual's photograph and signature • Accepted as primary identification up to three years after the expiry date on the card
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 as primary identification • Not accepted as primary identification if the individual last used a student, 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 photograph and signature • Accepted as primary identification up to three years after the expiry date on the card
Canadian birth certificate	<p>Most Canadian birth certificates are accepted as primary identification</p> <p>Documents that are not accepted as primary identification 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 as primary identification

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 as primary identification 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
Canadian Record of Landing	<ul style="list-style-type: none"> • Not accepted as primary identification if the individual has previously presented a permanent resident card, passport or citizenship document
Canadian immigration identification record	<ul style="list-style-type: none"> • Not accepted as primary identification if the individual has previously presented a permanent resident card, passport or citizenship document
Identity card	<ul style="list-style-type: none"> • Issued by the Department of Foreign Affairs and International Trade to foreign representatives accredited to Canada • Not accepted as primary identification if expired
Permanent resident card	<ul style="list-style-type: none"> • Not accepted as primary identification if expired • Confirmation of permanent resident, IMM5292 or IMM5688, is not accepted as primary identification
Secure Certificate of Indian Status	<ul style="list-style-type: none"> • Only new design cards issued by Aboriginal Affairs and Northern Development Canada are accepted as primary identification

Note: Temporary permits (student, visitor, work, temporary resident) are not accepted as primary identification for photo or combined BC services cards but are accepted as primary identification for BC driver's licences.

TABLE 2 Accepted Secondary Identification

The following documents are accepted as secondary identification, except where noted:

Type of identification	CONDITIONS
Bank card	<ul style="list-style-type: none"> • The individual's name must be imprinted on the card • Must include the individual's signature
Baptismal certificate	<ul style="list-style-type: none"> • Not accepted as secondary identification
BC services card (non-photo)	<ul style="list-style-type: none"> • The individual's name must be imprinted on the card • Accepted as secondary identification up to one year after the expiry date on the card
Birth certificate from foreign country	
Canadian Forces ID	
Canadian Registration of Birth Abroad Certificates	<ul style="list-style-type: none"> • Not accepted as secondary identification
Correctional service conditional release card	
Credit card	<ul style="list-style-type: none"> • The individual's name must be imprinted on the card • 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 (Canadian or U.S.)	
Employee ID card with photo	
Foreign Affairs Canada or Consular ID	
Health card issued by a Canadian province or territory	
Native Status card	
Nexus card	<ul style="list-style-type: none"> • Must include the individual's name and photograph
Parole Certificate ID	
Passport (Foreign passports, including U.S. passport card)	<ul style="list-style-type: none"> • Not accepted as secondary identification if expired
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	

Type of identification	CONDITIONS
Possession and Acquisition Licence (PAL)	
Secondary ID Attestation form	<ul style="list-style-type: none"> • Must be issued in BC • Must be validated by ICBC • Not accepted as secondary identification if expired
Social insurance card	<ul style="list-style-type: none"> • Must include the individual's signature. Newer cards without a signature are not accepted as secondary identification
Student card (school ID)	

Schedule B: Required Evidence of a Name Change

1. If an individual's name has changed, or changed more than once, he or she 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. an immigration document issued by the Canadian government,then the individual must present that document as evidence. A linking document would not be required.