Office of the Registrar of Lobbyists for British Columbia

Strategic Plan
2025/26 - 2027/28

Building trust through transparency

O·R·L·

October 2025

WHO WE ARE

The Registrar of Lobbyists provides independent oversight and enforcement of BC's provincial lobbying law.

The *Lobbyists Transparency Act* (LTA) requires individuals and organizations who lobby public office holders and meet specific criteria to register lobbying activities in an online registry.

The goal of the LTA is to promote transparency in lobbying by allowing citizens to know who is attempting to influence public office holders' decisions.

The Information and Privacy Commissoiner is designated the Registrar of Lobbyists for the purposes of the *Lobbyists Transparency Act* (LTA).

Michael Harvey is BC's Registrar of Lobbyists.

The Registrar of Lobbyists for BC respectfully acknowledges that its office is located on the traditional territories of the Lekwungen people of the Songhees and Esquimalt Nations.

The work of the Registrar spans across British Columbia, and the Registrar and office acknowledges the territories of First Nations around BC and is grateful to carry out our work on these lands.

TABLE OF CONTENTS

REGISTRAR'S MESSAGE

Trust is a fundamental quality of a democratic society, but it's complex and nuanced. "Just trust me" doesn't fly in a democracy. The opposite is true... trust in a democracy is based on the ability of citizens to hold accountable those who exercise authority. This accountability is based on transparency - to hold someone to account requires that an account is made and available for review.

Faced with challenges at home and abroad - whether economic, political, or social - it is critical that we buttress the trust that our citizens have in public officials.

In British Columbia, the *Lobbyists Transparency Act* contributes to that transparency by shining light on one way in which organizations attempt to influence decisions, policies, and programs by public entities. Lobbying is an important part of our democracy as organizations and associations - whether for-profit or not-for-profit - try to provide information about their activities, needs, preferences, and pressures so that government, legislators, and other public officials can understand the society that they are charged with governing and providing public goods and services to. When lobbying happens without transparency, accountability suffers and trust is damaged. People will suspect that some have more access than others and that the maxim of "trust, but verify" cannot be applied.

Because the *Lobbyists Transparency Act* (LTA) requires that anyone lobbying in BC register as a lobbyist and report their lobbying of public office holders, the people of the province have access to a wealth of data in our Registry about who is lobbying whom. "Trust, but verify" can be put into action.

The Registry is only as good as the information that's in it. People can trust it as a source of truth if there is broad compliance. To those ends, the strategic focus of the ORL will be on building trust by increasing awareness of the lobbying rules and agility in enforcement.

Building awareness has two components: we want to enhance compliance with the Act by increasing awareness among the lobbying and public office communities to ensure that they know their legislative responsibilities and comply with them. But we also have a sense that there is a lot of room to build awareness of the Registry - and the oversight of it that the ORL performs - among the public.

As for agility, we recognize that compliance with the LTA will be improved the easier it is to comply with. To achieve this we will advocate for simplicity in reforming our legislation and are committed to streamlining our own Registry and oversight operations.

The ORL is a team of dedicated professionals truly dedicated to the principles of transparency, accountability and democracy. This strategic plan has been developed collaboratively by this team and we are collectively committed to its goals. We consider it a privilege to support the democratic pillar of accountability for the people of BC.

Michael Harvey
Registrar of Lobbyists for BC

TRANSPARENCY & INFORMATION IN TODAY'S BC

The ORL's understanding of the operational context against which this plan is set is based on feedback received throughout an internal and external engagement process that occurred in the first half 2025. The external process, in conjunction with the OIPC, included an in-person seven-city listening tour and a written submission component that sought feedback from anyone interested in providing insight as to what they think the ORL's priorities should be in the next three years.

Distrust in social/economic/political systems

- Growing mistrust of public institutions, where the belief that government is working for special interests rather than the public good, poses a fundamental threat to the trust that underpins our democracy.

Need for legislative reform

- British Columbia has one of the most comprehensive lobbying oversight regimes in North America; however, complex registration requirements and processes can create compliance challenges for lobbyists.

Stigma of lobbying

- Despite its valuable role in our democracy, lobbying is often characterized as a corrupting influence – attempts by special interest groups to manipulate government decision-making to their own ends.

Resource constraints

- Economic uncertainty and competing priorities mean that many organizations are struggling to understand and devote the resources needed to comply with their lobbying registration requirements.

- Some organizations may struggle with the administrative aspects of registering or have limited knowledge of their obligations under the law.

High demand for ORL education/services

- The challenges facing the lobbying community in BC have resulted in an unprecedented demand for education and guidance from the ORL.

Knowing the unknowns

- The effectiveness of the Lobbyists Registry as a vehicle for transparency and accountability depends on how complete a picture of lobbying activity it provides.

- Every interaction between a lobbyist and a public policy-maker that is not recorded in the Lobbyists Registry weakens transparency and threatens to erode public trust.

PLAN AT A GLANCE

VALUES	Impartiality	Expertise	Dedication	Respect	Innovation

VISION

A province where people in BC have protection of their rights to access to information, privacy, and transparency, and that those protections enable them to achieve their aspirations and participate in a democratic society.

MANDATE

- promote awareness among lobbyists of registration requirements;

- promote awareness among the public of the existence of the Lobbyists Registry;

- manage the Registry and registrations submitted to it; and

- monitor and enforce compliance with the LTA.

STRATEGIC PRIORITIES

Raising awareness

Goals

- Increase awareness of the ORL and the LTA amongst unregistered lobbyists

- Increase awareness of the ORL and LTA with Public Office Holders

- Make information in the Registry more accessible

Agile oversight

Goals

- Improve compliance through simplification

- Improve compliance through responsive enforcement

- Improve compliance through efficient and effective guidance and tailored education

STRATEGIC PRIORITIES

Awareness

It is clear to the ORL through our internal and external engagement that we have a ways to go with increasing awareness of the LTA. This creates two issues: while awareness has been growing over the years, it is not uncommon for us to encounter organizations that are not aware of the existence of the LTA, that do not think that they are lobbying, or that do not understand what activities of theirs constitute lobbying.

This creates compliance and transparency problems, but it also creates enforcement problems – when an organization comes to us having belatedly discovered their obligations, how are we to respond in a manner that maintains the integrity of the Act?

But the awareness problem is broader – it is apparent to us that citizens of the province do not know exactly how transparent the system is. There is little question that lobbying carries a stigma, but if people understood that lobbying is not the shadowy activity that they might imagine it to be, and that there is an oversight body that can investigate when there are allegations or evidence of non-compliant lobbying, then trust in our democratic system might be higher. It is a strategic priority for the ORL to enhance awareness among both the regulated lobbying community and citizens alike.

Goal 1: Increase awareness of the ORL and LTA amongst unregistered lobbyists

- The *Lobbyists Transparency Act* builds trust between government and the people of this province by providing accountability and transparency around attempts to influence decision-making. Accountability, transparency and public trust suffer when lobbyists are unaware of their obligations under the LTA or choose not to register their activities.

- The ORL will take proactive measures to identify lobbyists, ensure that they understand their obligations, and make their pathway to compliance as straightforward as possible.

Awareness

Goal 2: Increase awareness of the ORL and LTA with Public Office Holders

- While the LTA is focused on lobbyists' obligations to register their activities, public office holders can play an important role in supporting the legislation's goals of transparency and accountability. When public office holders know whether interactions or communications constitute lobbying, they can encourage lobbyists to register them.

- The ORL will develop education and training programs for public office holders to help them understand the rules around lobbying registration in BC and encourage them to share relevant information during potential lobbying interactions.

Goal 3: Make information in the Registry more accessible

- BC's Lobbyists Registry provides a central and transparent record of attempts to influence government decision-making. The Registry's purposes of promoting transparency and accountability are hindered if the information it contains is not accessible, or meaningful to the people seeking it out.

- The ORL will work to identify Registry information that is important to the overall purpose of transparency, as well as to specific groups, and to improve how that information is shared. The aim is to enhance the transparency of the Registry in a manner that is meaningful and effective for those seeking information.

Summary of where we will start

- Explore ways to identify unregistered lobbying, and to raise awareness among established lobbying networks.
- Identify opportunities to communicate with Public Office Holders and offer education on how they can support lobbyists in registering.
- Determine how to deliver key information about the LTA and the Registry.

Agile oversight

An Act that people can understand is one that is easier to comply with and enforce. A Registry that is more straightforward to enter data into is one that provides more accountability.

It is a strategic priority for the ORL to continue to strive, through its operation of the Registry, its enforcement, its outreach and education, and its advocacy for statutory reform, to work towards that sweet spot between maximal information being available to the public, and a streamlined process of getting it to them.

Goal 1: Improve compliance through simplification

- BC's robust lobbying regulatory framework offers people in the province a higher level of transparency than in some other jurisdictions. However, in practice, many lobbyists find compliance with the LTA to be complex.

- The ORL will advocate for legislative amendments that prioritize simplicity in lobbying registration, while still maintaining the legislation's core purpose of transparency and accountability.

- The office will also work on simplifying and streamlining its own compliance and enforcement processes.

Goal 2: Improve compliance through responsive enforcement

- In the vast majority of cases, the ORL focuses on lobbyist education rather than punitive enforcement to encourage compliance.

- Going forward, the ORL will continue to take this education-first approach, while exploring how to improve different pathways to compliance. By recognizing and responding to different needs, the ORL aims to best serve all members of BC's lobbying community.

Agile oversight

Goal 3: Improve compliance through efficient and effective guidance and tailored education

- BC's lobbying community is diverse and comprises everyone from professional lobbyists to people working for smaller organizations who want their voices heard by decision-makers. Clear accessible guidance can help all groups understand the LTA and how to meet their obligations under the law.

- The ORL will develop guidance and education programs that are targeted to lobbyists' level of understanding, and specific lobbying scenarios. This approach will draw on ORL investigation findings to provide lobbyists with clear direction on how they can best meet their lobbying registration obligations, and on the office's enforcement practices.

Summary of where we will start

- Advocate for a legislative framework that promotes compliance through a streamlined Act.

- Review processes to identify internal efficiencies and enhanced oversight.

- Review education strategies to provide a layered approach to education and guidance, while reflecting emerging enforcement practices.

MOVING FORWARD

Over the next three years, the ORL will prioritize initiatives, education, and enforcement actions that align with the strategic priorities set out in this document.

This plan serves as a high-level road map for the work of the office, and is not intended to reflect or limit individual objectives or actions associated with the plan. We have identified actions for each goal in the plan for this first fiscal year, and will report out on our progress in our Annual Report and Service Plan.

The ORL would like to thank everyone who participated in our consultation period that laid the foundation for this report, including those who attended in-person sessions around BC in May. A summary of those consultations, in the form of a *What We Heard* review, can be found at the end of this document.

RESOURCES

General

- Business relationships: Affiliates and others with an interest in lobbying activities
- Codes of conduct
- Exemption process for former public office holders
- Getting started - Reference guide
- Glossary of terms
- Government funding
- Guidance for lobbyists during an election
- How to report political sponsorship and recall contributions in the Lobbyists Registry
- Lobbyist Gifts and other benefits
- Non-profit organizations
- Organizations
- Payment and reimbursement
- Political, sponsorship, and recall contributions
- Procurement
- Provincial entities
- Public office holders and the *Lobbyists Transparency Act*
- Registrar of Lobbyists: Guide to investigations
- Working together for the purpose of lobbying

User Guides

- Accessing information in the Lobbyists Registry
- Account management
- Funding returns
- How to register and report your lobbying activities
- Monthly Returns: Registration return updates and lobbying activity reports
- Quick reference guide for representatives
- Registration returns: new and reactivations
- Sample questionnaire for consultant lobbyists' clients
- Sample questionnaire for organizations that are lobbying
- Tracking lobbying activities: Consultant lobbyists
- Tracking lobbying activities: In-house lobbyists

Infographics

- Are you lobbying?
- Has the most senior paid officer in your organization changed?
- Monthly returns: What are they and when
- Registration timelines
- What do the *Miscellaneous Statutes Amendment Act, 2024,* amendments mean for my lobbying registration?
- What is a funding return?

LISTENING, LEARNING & PLANNING

What we heard from stakeholders and staff to inform
strategic direction for the OIPC and the ORL

Prepared for

The Office of the Information and Privacy Commissioner for British Columbia
and the Office of the Registrar of Lobbyists

Prepared by

Hayden Public Relations

July 31, 2025

Introduction

This report summarizes input gathered through a province-wide, external and internal engagement process led by the Office of the Information and Privacy Commissioner for British Columbia (OIPC) and the Office of the Registrar of Lobbyists (ORL). It is intended to inform the development of a new multi-year strategic plan for both offices.

The insights aim to reflect what was shared by stakeholders, expert advisors, written contributors, members of the public and staff. These voices brought a wide range of perspectives on the OIPC and ORL's work to advance privacy, access to information and lobbying transparency, as well as the role of oversight in a challenging and changing environment.

This report is not a strategic plan, nor does it represent final decisions. It is a tool: an account of the input received, along with recommendations, to support the Commissioner and his team in determining their priorities in the years ahead.

About the OIPC and ORL

The OIPC and the ORL are independent Offices of the Legislature, both led by Commissioner Michael Harvey. The OIPC provides oversight of access to information and privacy compliance across more than 2,900 public bodies under the *Freedom of Information and Protection of Privacy Act* (FIPPA) and oversees privacy obligations in the private sector under the *Personal Information Protection Act* (PIPA). The ORL is responsible for enforcing the *Lobbyists Transparency Act* (LTA) and maintaining the public registry of lobbying activity in the province.

The OIPC operates with the vision of a community where privacy is respected in both public and private sectors, access to information rights are robustly exercised, and public institutions are open and accountable. Its work is guided by five core values: impartiality, expertise, dedication, respect and innovation. Work is guided by those served, including the public, the Legislative Assembly of British Columbia, public bodies and organizations covered by FIPPA and PIPA, and lobbyists and public office holders under the LTA. Although each office has a distinct legislative mandate and publishes separate annual reports and service plans, they operate with shared leadership and collaborate in areas such as staffing, planning and digital infrastructure.

Context

Commissioner Michael Harvey was appointed in May 2024 to lead both the OIPC and the ORL. In the months that followed his appointment, Commissioner Harvey focused on understanding the organization, the environment and the communities served. He then launched a strategic planning initiative centered on listening to a wide range of groups including staff and expert advisors, local and provincial governments, civil society organizations, professional associations, Indigenous-serving organizations, journalists, small businesses, academics and members of the public.

During the spring and summer of 2025, the OIPC and ORL carried out an extensive engagement process. This included a multi-city listening tour, internal planning sessions, staff team interviews, an external advisory board meeting, stakeholder conversations, written submissions and an environmental scan.

The planning process underway is an opportunity to shape a multi-year strategic direction for both offices that reflects the current privacy, access and transparency landscape in British Columbia. The process was designed to consider and reflect on the dual mandates and bring in perspectives from across the province, including voices not always heard in public policy work. The OIPC and ORL wanted to know what issues and risks to pay attention to, where there are barriers to compliance and how their oversight, guidance and enforcement could be more effective. They asked about what is working well, where laws or processes are unclear and what support is needed to help people understand and exercise their rights. They also invited perspectives on how to improve public trust, reduce burdens for smaller organizations and make their work more inclusive and responsive across different regions and communities.

This report is based on a close review and analysis of the input via notes, transcripts and written materials from all engagement activities. We start by focusing on what we heard and learned, organized by theme, and then make recommendations.

Others said the process favours those with resources, especially when cost estimates are used as a deterrent. Some journalists described being treated as commercial applicants or facing inconsistent fee calculations. Others said that high estimates, combined with long timelines, make it hard for FOI to be used effectively for public-interest accountability. Internal and external voices also raised concern about how FOI laws are being interpreted. Several said that some public bodies apply provisions of FIPPA too broadly or inconsistently, limiting access without clear justification. Participants asked whether stronger expectations, clearer definitions or centralized guidance might help ensure that disclosure decisions are applied more consistently across the system.

There were also repeated calls to reduce burden at the source. Some suggested expanding proactive disclosure obligations to reduce the need for routine FOI. Several said that the current system is neither sustainable nor fair — placing significant strain on public servants without improving outcomes for the people seeking access.

Organizations have difficulty keeping up with advances in technology

Across consultations, submissions and internal planning sessions, participants raised concerns that new technologies are being introduced faster than organizations can confidently respond to them. Privacy laws remain broadly applicable, but the tools and interpretation frameworks available to apply them are not keeping pace. The input all pointed to the same core problem: systems for managing privacy risk have not evolved as quickly as the technologies driving that risk.

Artificial intelligence (AI) was a consistent focus. Participants asked when the use of AI requires a privacy impact assessment (PIA), how algorithmic tools are assessed for bias or risk and what responsibilities apply when public or private organizations rely on third-party systems. Several raised questions about metadata, prompts and training data, and whether existing privacy frameworks cover these inputs. There were specific requests for provincial guidance on AI in areas such as automated decision-making and meaningful consent. Caseload analysis confirms these concerns are already emerging in practice. The OIPC is seeing a growing number of complaints and review requests involving surveillance, automated systems and uncertainty about what constitutes personal information in digital environments.

Surveillance concerns were also prominent. Participants described increasing use of monitoring technologies across housing, healthcare, education and public spaces. Examples included the growing use of doorbell cameras and privately owned surveillance systems that capture activity in shared or public areas. Some acknowledged these tools are often introduced for safety reasons, but they questioned whether people understand when they are being recorded or have any real ability to opt out. Several said that surveillance is becoming normalized without adequate oversight and that privacy risks are often invisible to the people who may be most affected.

> " Much of the data that is collected from these devices is done explicitly for the purposes of developing a secondary stream of revenue for companies and packaged under the guise of improved functionality. "

Internal planning reflections echoed these points and identified a gap in capacity to support complex technology files, especially where legal precedent is limited or context specific. Staff noted that without stronger internal capability and clearer expectations, regulated organizations may avoid new technologies entirely or rely on informal workarounds that carry legal or ethical risk.

Participants said they do not expect the OIPC to solve every technology issue but do want leadership in helping define appropriate standards and clarifying how privacy law applies in digital systems. Some emphasized that privacy should support, not block, responsible innovation. Others said the absence of clear direction may discourage good actors while allowing inconsistent practices to continue unchallenged.

Awareness and education on access, privacy and lobbying must be strengthened

Participants across consultations, submissions and internal planning discussions emphasized that education, awareness and guidance are essential to ensuring transparency, fairness and compliance, but the needs differ across audiences.

For the ORL, the core issue is basic awareness. Several participants were unaware of the Registry or unsure whether lobbying rules applied to them. Others said they only learned of the requirements after receiving a warning or being investigated. These concerns were echoed in internal planning materials and confirmed in the ORL's service plan, which identifies public education as one of three goals. The ORL's SWOT analysis also lists lack of awareness of the office and the LTA as a key organizational weakness. Participants said outreach is especially needed for smaller organizations and in-house lobbyists, who often have no legal support and limited familiarity with registration rules.

Even when resources are available, they are not always clear or easy to use. Some described the Registry as intimidating or overly complex, any guidance as legalistic or vague, and noted the absence of any real advisory support for interpreting requirements. Others expressed hesitancy about asking questions, fearing it might trigger enforcement. This was particularly strong among groups with limited capacity, who said the rules felt unclear or out of reach. Media scan findings suggest that public discussion of lobbying in B.C. often lacks clarity about what the law requires and who is responsible for enforcing it.

In contrast, the OIPC is more widely recognized, but many said its role and processes are not well understood. There was strong interest in clearer, more practical guidance on topics such as PIAs, surveillance, AI, information sharing between ministries and third parties and the handling of records involving deceased individuals. Participants also asked for help with consent frameworks, data-sharing scenarios and situations involving cloud-based or third-party systems. Internal staff echoed these concerns, noting that a significant portion of complaints and requests for review arise from confusion or unclear expectations. Teams described the current approach to guidance as largely reactive, developed case by case rather than through a planned or proactive framework.

> " We would welcome input and guidance in terms of how best to address and possibly harmonize operational policies related to information sharing at regional interagency tables where the federal Privacy Act, FOIPPA and PIPA come into play. "

Participants were clear that what is needed is not just more guidance, but guidance that is usable, specific and matched to real-world needs. Several emphasized the importance of tools such as model clauses for contracts, templates, annotated PIAs and checklists for determining when disclosures are permitted under law.

Smaller organizations in particular asked for sector-specific examples and plain language summaries that could be used without legal support. Staff confirmed that these types of requests are common, but said they are often unable to provide consistent or up-to-date tools in response.

Education was also seen as essential for the public. People do not always understand their privacy or access rights, how to exercise them or where to turn for help. This was said to be especially true for newcomers, seniors, people with limited digital access and those unfamiliar with how the laws apply in daily life. Suggestions included community-based education, partnerships with trusted intermediaries and plain language materials that help people understand not just the law, but how to use it.

Others raised concerns that public education also needs to address the broader digital environment. It should not just focus on rights, but how personal data is collected, inferred and used in ways people may not fully understand. Areas of concern included social media, profiling, targeted advertising, AI-enabled surveillance and digital systems used in housing, education and public spaces. Some noted that opting out is often not realistic, especially for those relying on public services. Raising awareness about privacy issues and risks was seen as key to building digital literacy, autonomy and informed participation.

Across all groups, participants expressed that better education, clearer materials and more responsive outreach would improve understanding and reduce conflict. Several said this work is especially important for public-facing institutions, where confusion about the rules can erode confidence in the systems that are meant to protect privacy and promote transparency.

Many organizations are not equipped to fully meet their obligations

Participants across the engagement process described widespread capacity challenges that limit how organizations meet their privacy and access obligations. These concerns came up in listening sessions, internal interviews, written submissions and stakeholder discussions. This was not about unwillingness. It came down to practical constraints. Staff, time, funding and records infrastructure were all flagged as barriers.

The most acute concerns came from smaller organizations. Many said they have only one person, sometimes part-time, tasked with all access and privacy work. Internal staff confirmed that current oversight models assume a baseline capacity that many organizations do not meet.

> " Frequently, smaller organizations or non-profits do not have the resources to navigate the detailed lobbying registration requirements and may unintentionally miss the mark on compliance due to a lack of understanding or capacity. "

Participants emphasized that while FOI timelines are one symptom of the issue, the core problem is deeper. Limited records management capacity was described as a fundamental obstacle to both transparency and privacy compliance. Some said they cannot reliably search, redact or assess risk across their systems. In some organizations, privacy-related records are scattered across paper files, personal drives, inboxes and cloud folders, with no consistent structure or digital tools.

OIPC staff noted that records management gaps are a common thread in privacy complaints. Even in cases that begin as privacy disputes, the root issue is often an inability to locate, verify or manage records. There were also concerns about data governance across teams and systems, especially where staff turnover or informal practices make it difficult to track personal information use over time.

There was a sense, particularly among lower-resourced organizations and those handling sensitive data, that contacting the OIPC for support could carry risk. Some expressed concern that seeking advice could trigger formal scrutiny.

Input across sources also pointed to the absence of a proactive or preventive support model. Several noted that there is currently no clear mechanism to identify or assist

organizations that may be struggling before issues escalate. The overall approach was described as largely reactive, with tools and outreach developed in response to problems rather than through an ongoing strategy to build capacity and confidence.

Laws are misaligned with how today's systems and services work

Several stakeholders expressed concern that several of BC's core privacy, access and lobbying laws do not reflect how information is created, stored or shared in practice. While the underlying principles of these laws remain valued, many suggested that the way they are written no longer fits the realities of digital systems, complex service delivery models or cross-organizational workflows.

Challenges with key statutory concepts such as custody and control, meaningful consent and reasonable search were raised across stakeholder interviews, public engagement sessions and internal feedback. These concepts were described as increasingly difficult to apply in the context of cloud storage, shared platforms, artificial intelligence and third-party service providers. Additional concerns were expressed about the tension between FOI timelines and the operational needs of service delivery, particularly when records span multiple systems or jurisdictions.

Several staff said these structural issues often lead to delays, hesitation or conflicting interpretations. Some described routinely navigating around gaps in the legislation because it does not align with the way systems actually function. These challenges were often linked to environments involving sensitive data, emerging technologies or service delivery across multiple partners or systems.

> "
> PIPA should be updated with mandatory privacy management programs and privacy impact assessments, along with fines for non-compliance.
> "

There was also concern about the limits of PIPA. Multiple stakeholders said the Act is outdated, lacks enforcement mechanisms and does not require structured privacy programs. Some called for updates that would bring BC in line with other jurisdictions, such as Quebec's Law 25 or proposed federal reforms. Suggestions included mandatory privacy management programs, stronger breach reporting rules and the authority to issue fines.

While FIPPA was updated in 2021, concerns raised across external and internal input suggest that many foundational elements still do not account for how digital systems and public bodies function today. These concerns were rooted not in a lack of guidance or understanding, but in the structural limitations of the legislation itself.

The rights of children and youth are constrained

There was clear concern across the input received that BC's current privacy laws and practices do not reflect the realities children and youth face when interacting with digital platforms and public systems. Feedback highlighted risks in education, health care, housing, and other institutional settings, particularly where services involve multiple agencies or long-term involvement by the state.

Many noted that privacy frameworks often assume adult users and fail to reflect the ways young people engage with technology or receive services. Consent processes were described as legalistic and inaccessible, with forms written at an adult reading level and applied without consideration of a young person's comprehension or circumstances. Families and young people are often left without a clear understanding of who holds their information, how it is used, or how to challenge it.

> As children's personal data is being harvested and monetised at unprecedented pace and scale, a robust data protection framework is crucial for ensuring children's privacy, safety, and agency in the digital environment.

Youth records remaining on file for years was another recurring concern and these records could influence how young people are treated by institutions long after the original context has changed. In many cases, there appears to be no path to correct or update that information, even when it affects access to services or supports.

Information sharing between agencies was identified as a source of confusion and risk. Teams working in child protection, policing, Indigenous service delivery and education described uncertainty about which laws apply in shared settings. Different legal obligations can result in hesitation, delays or conflicting interpretations. Several

submissions called for consistent and lawful models for privacy-respecting collaboration in multidisciplinary youth-serving environments.

Timeliness of access to youth-related records was also flagged as a concern. One public body accounted for more than a quarter of all government time extension requests, the majority of which involved children and youth. Delays in accessing records, especially in child protection cases, were described as having serious impacts on families, services and legal processes.

In school and post-secondary settings, concerns were raised about digital monitoring tools such as AI-enabled proctoring systems. These tools were said to lack transparency and oversight, and to be introduced without clear pathways for students to understand or challenge how they were being used. Questions were raised about whether these tools are consistent with principles of accountability and proportionality when applied to children and youth.

Across the input, there was strong support for treating children and youth as full rights-holders. Input emphasized the need for privacy systems that reflect young people's capacity, context and long-term interests. Young people should be able to understand what data is collected about them, correct or contest records that affect them, and participate meaningfully in decisions about how their information is used.

Several submissions called for legal and policy models based on default protections, rather than placing the burden on young people to navigate complex consent systems. Others pointed to risks such as profiling, nudging and manipulative platform design, and called for privacy approaches that focus on dignity, autonomy and safety from the start.

OIPC and ORL practices can shape how oversight is experienced

Input across internal and external sources suggested that the way the OIPC manages intake, triage and investigations can shape how individuals and organizations experience oversight. While the office plays a vital role in protecting information rights, feedback pointed to areas where its own processes may contribute to delay, uneven treatment or diminished confidence in outcomes.

A primary concern was delay. Some files stalled for months with no update and some said it felt like progress depended on follow-up pressure rather than a clear process. Delays were seen as especially difficult in time-sensitive matters or those with broader public interest. Internally, staff noted ongoing backlogs and identified opportunities to improve case management and triage tools.

B.C.'s privacy and access systems do not serve everyone equally

There was consistent recognition that privacy and access systems in B.C. do not serve all communities equally. This included concerns about how people access their rights, how those rights are supported in real-world contexts and whether oversight systems reflect the needs of those most affected.

Systemic barriers were identified that make it more difficult for some individuals and communities to navigate privacy and access frameworks. These include language, literacy, disability, unstable housing, limited internet access and lack of institutional trust. People are often expected to locate the right channels, complete formal paperwork and understand legal entitlements without support. Those facing social or economic marginalization may be less likely to take these steps, especially when there is fear of being disbelieved or further scrutinized. Some pointed to power imbalances that affect groups such as children in care or people who are incarcerated, raising questions about how those least likely to assert their rights are heard and supported.

Concerns were also raised about the experience of tracking and surveillance of marginalized populations. Monitoring is more common in some service environments, including housing, education and social supports, but individuals affected may have limited ability to question or influence how their personal information is collected or used. Others noted that those who feel comfortable being surveilled are often those least likely to face discrimination, and that this sense of safety reflects privilege, not shared experience.

There was also uncertainty about whether equity-related data collection efforts are leading to meaningful change. While intended to support inclusion or track outcomes, input received suggested that collecting more data does not always result in better service, protection or representation. Some questioned whether this information is being retained or repurposed in ways that reinforce rather than reduce marginalization.

Indigenous data sovereignty was identified as a significant and ongoing gap. Input emphasized the need to align privacy oversight with Indigenous-led governance models, with OCAP principles and with the rights affirmed in UNDRIP. Submissions called for long-term access to data on terms defined by Indigenous communities, control over how information is stored, accessed and reported, and sustained resourcing to support these practices.

> Data Sovereignty is not the work of any organization other than the sovereign Nations within themselves.

There were also calls for the OIPC to embed equity more explicitly across its functions, including in outreach and intake processes. This included suggestions to improve how the office engages with and serves communities that face barriers in accessing privacy and access systems, such as newcomers, people with disabilities and those working in low-resourced settings. There were also concerns that guidance and public education materials may not be fully accessible to all audiences, particularly those with disabilities, lower literacy or limited digital access. The OIPC was encouraged to work with trusted intermediaries, develop plain language and culturally appropriate materials and ensure that services reflect the lived realities of those most affected.

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