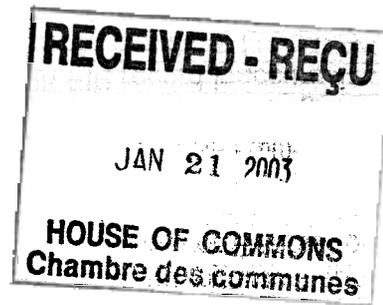


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JAN 17 2003

Mr. Garry Breitkreuz, MP
Yorkton-Melville
Room 452D, Centre Block
House of Commons
Ottawa ON K1A 0A6

Dear Mr. Breitkreuz:

This is further to Dennis Young's e-mail of January 9, 2003 seeking my views about continued errors in the gun registry's FIP database, as reported by the Auditor General of Canada in December of 2002.

I have reviewed Chapter 11 of the Auditor General's Report, which dealt with the Firearms Interest Police (FIP) database operated by the RCMP for the Firearms Program. Many of the systemic problems noted by the Auditor General with FIP record inaccuracies were previously outlined in my "Firearms Report" of August 2001. At that time, I had noted problems of individuals being improperly flagged in FIP, while other individuals who should have been flagged were not.

For FIP to be an effective early warning flag for potential violence, it is vital that police officers keep their incident reports accurate and up-to-date regarding the status of persons responsible for incidents covered by section 5 of the *Firearms Act*. Moreover, the *Privacy Act* requires that information collected for an administrative purpose be up to date and as accurate as possible.

The problem as I see it is that the responsibility for FIP data quality is dispersed among the some 900 law enforcement and Firearms Program contributors across the country. There is no one department or agency that effectively ensures the coordination and enforcement of common FIP data entry standards for all municipal, provincial and federal partners.



(*) Successive Ministers of Justice have declared that they were responsible for all aspects of the Firearms Program, but have failed to effectively resolve the serious problem of inaccurate FIP records. The RCMP, while managing the FIP database for the other firearms partners, claims responsibility for the data quality of only those records that it enters in the system. CFOs are responsible to ensure that all FIP hits against a firearms client are thoroughly reviewed; however, FIP entries are created by police agencies and are not controlled by the CFOs. This situation has left the control of data quality to each individual police agency and has contributed to inconsistencies in FIP entries among the various agencies.

To resolve these FIP problems I made the following recommendations in my "Firearms Report" of 2001:

- 1) Since DOJ's Canadian Firearms Centre is responsible for issues respecting data quality on FIP and in conformity with section 6(2) of the *Privacy Act* (accurate, complete and up-to-date information), there should be an auditing framework to verify the validity and accuracy of FIP records.
- 2) The Canadian Firearms Centre FIP Project Team should continue to work towards establishing and implementing common police agency extract standards and procedures, and a copy of the report(s) of improvements should be provided to the Privacy Commissioner.

(*) To date, the department has not implemented my recommendations, nor has it provided any of the progress reports I have requested. I do not have the power under the *Privacy Act* to order DOJ to implement these and my other recommendations concerning this initiative. However, I will continue to express my concerns to the Minister of Justice and urge him to quickly take appropriate measures with his stakeholders to bring the Program into compliance with the *Privacy Act*.

The Auditor General's report has underlined the vital importance of introducing controls immediately to ensure the accuracy of all FIP records. It serves to underscore the critical importance of implementing the recommendations I made some 18 months ago regarding the issue of data integrity.

Yours sincerely,

George Radwanski
Privacy Commissioner of Canada