
Corporate Human Resources
Security Screening Directive
Privacy Impact Assessment

Updated Report
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In consultation with:
Information and Privacy Office
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EXECUTIVE SUMMARY

The Security Screening Directive is intended to strengthen the due diligence process with respect to the appointment or reclassification of employees into certain designated positions. Individuals who are hired to specified positions will have undergone a screening that not only reviews their employment and reference information as is currently in place, but will also allow for the review and identification of any potential concerns through criminal records checks, and/or financial management risk indicators.

The authority for the collection and use of the personal information as indicated stems from the [Public Service Act](#), the [Government Organization Act](#), and the [Freedom of Information and Protection of Privacy Act](#). Corporate Human Resources is charged with the responsibility of implementing the Directive and coordinating related human resource programs and activities across the various Ministries, on behalf of the Government of Alberta, as one employer.

Personal information that is collected through this process is only be used for purposes outlined. It is handled in a manner that respects the sensitivity and the privacy concerns of the individuals to whom the information pertains.

This updated Privacy Impact Assessment report incorporates changes that have been made to the Financial Management Risk Indicator Screening process. These changes include the following: a Level 1 Criminal Records Check will no longer be required for all external candidates. A Vulnerability Risk Indicator through the Canadian Security Intelligence Service will no longer be required as part of the Level 2 Enhanced Security Screening.

Table of Contents

EXECUTIVE SUMMARY.....	2
1.0 DESCRIPTION OF THE SECURITY SCREENING DIRECTIVE	4
1.1 Responsible Public Bodies	4
1.2 Responsible Business Area	4
1.3 Contact Person	4
1.4 Background.....	5
1.5 Situation Prior to Implementation of the Directive (February 2002)	6
1.6 Implications of the Directive on Security Screening Processes	6
1.7 Scope of the Security Screening Directive.....	7
1.8 Benefits.....	9
1.9 Timing.....	9
2.0 PERSONAL INFORMATION COLLECTED, USED AND DISCLOSED	10
2.1 Personal Information Collected.....	10
2.2 Information Flows	11
2.3 Information Users	13
3.0 PROTECTION OF PERSONAL INFORMATION ANALYSIS.....	15
3.1 Collection of Personal Information	15
3.2 Manner of Collection of Personal Information	18
3.3 Accuracy and Retention.....	19
3.4 Right to Request Correction of Personal Information.....	20
3.5 Protection of Personal Information.....	21
3.6 Use of Personal Information	21
3.7 Disclosure of Personal Information	21
3.8 Disclosure for Research or Statistical Purposes	22
4.0 POTENTIAL PRIVACY IMPACTS.....	24
4.1 Potential Privacy Impacts.....	24
4.2 Conclusion	24
APPENDIX 1: SECURITY SCREENING DIRECTIVE.....	25
APPENDIX 2: SECURITY SCREENING PROCESS (LEVEL 1 & 2).....	26
APPENDIX 3: POLICE SERVICE SECURITY SCREENING CHECK.....	35
APPENDIX 4: ALBERTA FINANCIAL RISK MANAGEMENT INDICATOR SCREENING	36

1.0 DESCRIPTION OF THE SECURITY SCREENING DIRECTIVE

The Security Screening Directive, and its implementation, is the focus of this Privacy Impact Assessment (PIA).

For the purpose of this document “security screening” is the general term used to describe Criminal Records Checks and/or Financial Management Risk Indicator Screenings. [Appendix 1](#) is the Security Screening Directive (referred to as the Directive in this report).

1.1 Responsible Public Bodies

Corporate Human Resources (CHR) is responsible, on behalf of the Government of Alberta, for developing, implementing and maintaining the Directive.

Every Ministry, Board, Commission, or other entity under the Public Service Act is subject to this Directive and is responsible for complying with this Directive.

The process of implementing and maintaining the activities required under the directive will be one that is coordinated by CHR. As one employer, Human Resources is an integrated service¹ and program that ensures consistency across the Government of Alberta.

The security screening processes are described in [Appendix 2](#).

1.2 Responsible Business Area

Staffing and Executive Search, CHR, is responsible for coordinating and managing the Directive and associated processes.

1.3 Contact Person

The following official can answer questions about the type of personal information collected and handled under the Directive for the purposes of this PIA:

Assistant Commissioner
Corporate Human Resource Development
Corporate Human Resources
5th Floor, Peace Hills Trust Building, 10011-109 Street
Edmonton, Alberta T5J3S8
Phone: (780) 408-8400

¹ Integrated Service as referred to under s. 40(1)(i) of the *Freedom of Information and Protection of Privacy Act*

1.4 Background

1.4.1 Role of Corporate Human Resources (CHR)

[Corporate Human Resources](#) (CHR) is the corporate human resources arm of the Alberta government. CHR establishes policy frameworks to support departments in achieving their business plan goals. CHR also works with departments to achieve cross-ministry human resource goals. Human resource directives are one tool that CHR utilizes to this end.

Human resource directives set out the general entitlements, benefits, authorities and requirements that apply in the administration of the employer's human resource program in Alberta government organizations under the *Public Service Act*. The purpose of a directive is to:

- Provide direction in the day-to-day administration of government human resources
- Provide a framework that encourages consistency and continuity in the administration of government human resources
- Provide degrees of flexibility to departments in addressing human resources issues
- Provide examples of standardized forms and other tools for departments to use and modify as required.

Every Ministry, Board, Commission, and any other entity subject to these directives is responsible for compliance (see sections [3.1.1](#) to 3.1.4 for a description of the legislative authority that exists between CHR and ministries).

Section 6(1)(c) of the [Public Service Act](#) provides the Public Service Commissioner with the general authority to:

(c) advise and assist departments in the conduct of departmental personnel activities [emphasis added];

This authorizes and supports the creation of a personnel, or human resources administration program within the Government of Alberta. In addition, individual Ministers are responsible for the ongoing personnel activity or program within their Ministries.

1.4.2 Intent of the Security Screening Directive

The Alberta Government has an overall responsibility to ensure that the provision of services for, and on behalf of, all Albertans are undertaken in an open and accountable manner. The increased delegation of responsibilities to managers in order to facilitate the necessary streamlining and efficiencies in decision-making, along with the increased expectations of the public for accountability are factors that have led the Public Service Commissioner after consultation with the Deputy Minister's Committee, to review the need for strengthened security screening processes.

The intent of the Directive is to ensure a sufficient degree of due diligence in the hiring or reclassifying of designated positions, who by virtue of their heightened degree of responsibility, and public trust, should withstand this level of scrutiny.

The decision has been made, in consultation with the Deputy Minister's Committee, by the Public Service Commissioner to issue the Directive as a means of screening new appointments.

1.5 Situation Prior to Implementation of the Directive (February 2002)

Previously, the main type of security screening required as part of the public service recruitment or reclassification process was a Criminal Records Check, as determined by each Ministry. In addition, Alberta Economic Development used a process conducted by the Canadian Security Intelligence Service (CSIS) to screen candidates for foreign postings.

Individual Ministries identified those positions that required Criminal Records Checks based on one or more of the following criteria:

- Positions of trust where the client relies on the character or truth of the employee.
Note: While all employees can be said to occupy a "position of trust", this criteria is interpreted as focusing on those positions that have significant client contact and/or where the well being of the client is in some way based on decisions made by the employee, such as Human Service or Group Home Workers.
- Positions charged with special status or designation.
- Positions dealing with court proceedings and evidence admitted to the court.
- Positions in contact with highly confidential/sensitive information or large amounts of cash, goods or restricted drugs.

The Criminal Records Check was coordinated through the Human Resources Advisor responsible for managing the appointment of an employee through competition or through an exemption. The most common process was for the individual to have the local police provide them with a certificate. The individual then submitted the certificate to the Human Resources Advisor. In one Ministry, a process had been established to have prospective appointees sign a consent form authorizing the employer to obtain a criminal records check on their behalf.

This process was not sufficient to meet the intent that had been identified by the Deputy Minister's Committee (see section 1.4.2).

1.6 Implications of the Directive on Security Screening Processes

The implementation of the Directive was not intended to significantly change the previous process for conducting a Criminal Records Check for Ministry-identified positions.

Ministries continue to have the flexibility to identify positions which they feel meet the criteria identified above and to require a Criminal Records Check be conducted prior to an appointment or reclassification being made to that position. Ministry identified positions come under the Directive.

Ministries do **not** have the authority to add specific positions to those listed in the Directive for the Enhanced Security Screening without consultation with the Deputy Minister of Executive Council.

1.7 Scope of the Security Screening Directive

The Directive introduces an additional level of security screening beyond that of a Criminal Records Check and identifies the specific positions that each level applies to (see [Appendix 1](#)). The positions identified at each level are representative of increasing responsibility, thereby requiring more thorough screening.

All positions that require security screening have been determined to meet some or all of the following criteria:

- Positions of trust where the client relies on the character or truth of the employee
- Positions charged with special status or designation
- Positions dealing with court proceedings and evidence admitted to the court
- Positions in contact with highly confidential/sensitive information or large amounts of cash, goods or restricted drugs.

The security screening results for all positions noted in this Directive are reviewed and assessed for any required follow-up action by designated official(s) listed in the Directive.

The type of security screening required is dependent on the classification hierarchy (see [Appendices 1](#) and [2](#)). There are two security levels and three screening components:

- Level 1 – Criminal Records Check – Criminal Records Check only
- Level 2 – Enhanced Security Screening -- Criminal Records Check *plus* Financial Management Risk Indicator Screening

The screening components are described in sections 1.7.1 to 1.7.4 below.

Security screenings are required for all future appointments or reclassifications to the positions identified in the Directive.

Consent of the individual is required before a security screening can be initiated.

The implementation of the Directive results in a common, consistent process to be used by the employer on behalf of the Government of Alberta (as described in [Appendix 2](#)).

1.7.1 Criminal Records Check (Level 1 & 2)

A Criminal Records Check involves a screening for the presence of criminal convictions, against the Canadian Police Information Center (CPIC). The screening is conducted by the applicable local police force.

While the intent of the Directive was to incorporate as much as possible, the Criminal Records Check procedures that Ministries used prior to February 2002, the procedures are subject to the rules established by the Directive.

In all cases where a Criminal Records Check is required, individuals are given the option to provide a certificate from the applicable police force themselves. Where the individual chooses to have the Ministry collect the Criminal Records Check information, the certificate will be made accessible to the individual upon request.

1.7.2 Financial Management Risk Indicator Screening (Level 2 only)

A Financial Management Risk Indicator Screening involves a screening for the presence of financial management risk indicators such as bankruptcies, garnishees, credit payments beyond 90 days, poor credit rating and the like.

The purpose of this screening is to identify the potential for risks to the employer where an individual has fiscal responsibility for budgets, expenditures or by their participation on Executive Committees through which they have input to, and influence on, program decisions taken by the Ministry.

The individual is provided every opportunity to discuss any perceptions of risk that are raised as a result of the information that is received by the employer.

1.7.3 Changes to the Financial Management Risk Indicator Screening Process

At the outset of the Security Screening Process a third party credit bureau was utilized in the analysis and provision of a report (Financial Management Risk Indicator Screenings) derived from the individual's actual credit bureau report. However, a number of issues surfaced, including concerns that resulted from the creation of a hard copy of the referral process. In order to deal with these and other concerns, a moratorium was put in place until such time that a more secure process could be developed. The following process was developed as a result of the review, and requires the use of a financial analyst working for the Justice and Solicitor General

While the individual's credit bureau report will be reviewed by the financial analyst, those details are **not** disclosed in the report to the employer.

In all cases where a Financial Management Risk Indicator Screening is required, individuals will be given the option as to how their personal information will be gathered and provided to the Government of Alberta.

It is the changes in this screening process that have resulted in the updating of this PIA report.

1.8 Benefits

Benefits derived from this Directive include the ability to assure Albertans that the employer, on behalf of the Provincial Government, has been duly diligent in recruiting, appointing or reclassifying individuals to designated positions who will have a responsibility for the stewardship of government resources and meet one or more of the criteria outlined in section 1.7. At the same time, the Directive provides a balance between those individuals' rights to privacy while they undergo a security screening, and maintaining accountability to Albertans. The employer is able to ensure that any concerns raised through either level of security screening have been reviewed and assessed at the time of hire, appointment or reclassification.

1.9 Timing

The employer will choose an effective date for the implementation of the revised Directive for future designated employees, once this updated PIA report is accepted by the Information and Privacy Commissioner.

2.0 PERSONAL INFORMATION COLLECTED, USED AND DISCLOSED

2.1 Personal Information Collected

Consent of the individual is required before the security screenings can be initiated. Individuals who choose not to provide their consent will not have their application for employment considered further.

The type of screening required will be dependent on the position as designated in the Directive. There are two security levels and three screening components (see *Figure 1*).

The information that individuals must provide to initiate the screening process is shown in [Appendix 3](#).

[Appendix 5](#) shows the personal information that will be reported as a result of the Financial Management Risk Indicator Screening.

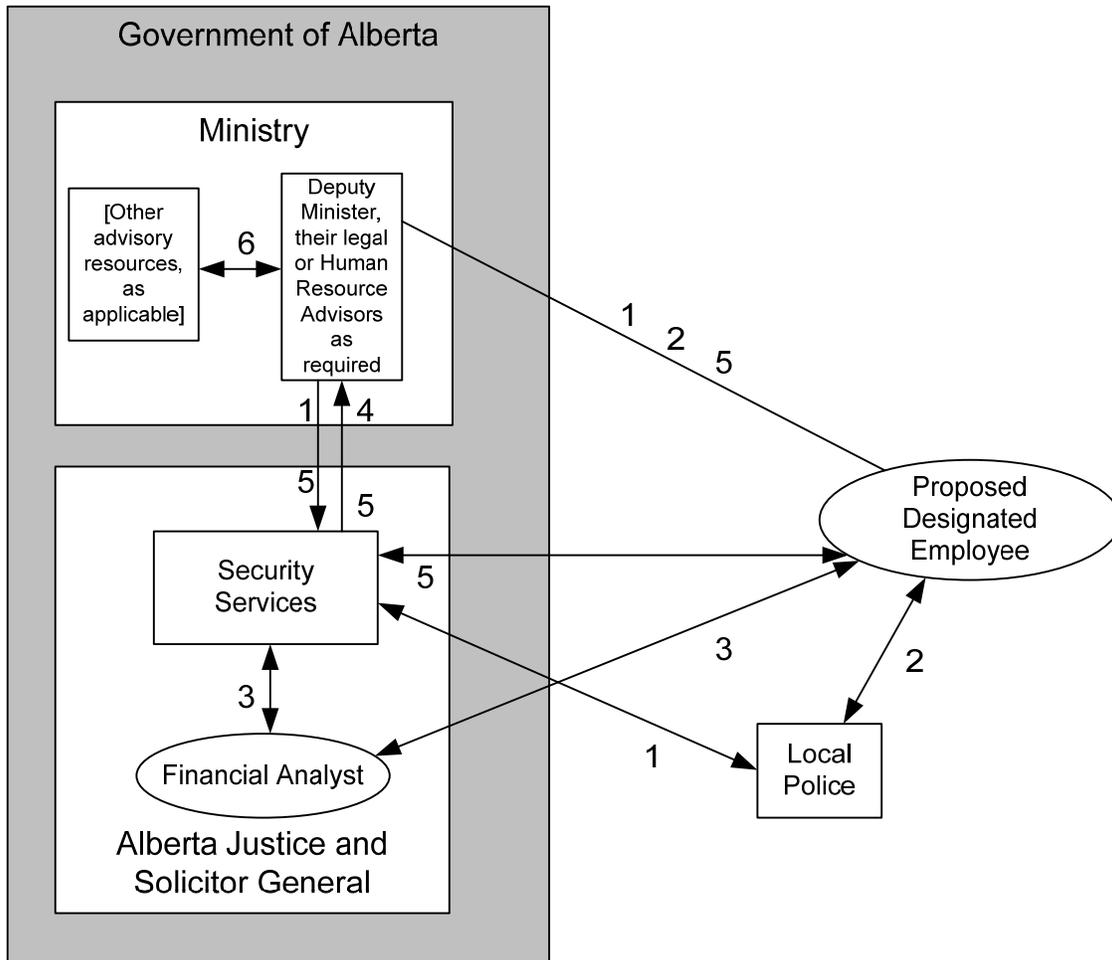
Figure 1
Personal Information Collected

Level 1 – Criminal Records Check		
Type of Check	Personal Information Provided by the Individual	Report Containing Personal Information Provided by:
Criminal Records Check	See Appendix 4	Local Police Service
Level 2 – Enhanced Security Screening		
Type of Check	Personal Information Provided by the Individual	Report Containing Personal Information Provided by:
Criminal Records Check	See Appendix 4	Local Police Service
Financial Management Risk Indicator Screening	See Appendix 5	Financial Analyst working for the Justice and Solicitor General

2.2 Information Flows

[Appendix 2](#) describes the security screening process. The information flows resulting from these processes are shown in *Figure 2*. A description of the information flows follows in section 2.2.1 below.

Figure 2
Security Screenings Information Flow
(as per Directive – Appendix 1)



2.2.1 Security Screenings Information Flow

A Level 1 security screening involves only a Criminal Records Check. A Level 2 screening involves a Criminal Records Check, a Financial Risk Management Indicator Screening. The Financial Risk Management Indicator Screening requires the review of the candidate’s credit bureau report by a financial analyst, and the subsequent completion of the Financial Risk Management Indicator Screening Report based on the findings of the review.

If the required Security documents are clear; i.e. no flags, then the Security Services Administrator, Alberta Justice and Solicitor General will email the appropriate Human Resources consultant and indicate that "All checks for ____ are clear." In cases where there is a flag on one or all of the Security documents, the Administrator will telephone the Human Resources consultant and make arrangements to fax the documents to the Human Resources consultant for review. Once reviewed and a decision is made, that copy is destroyed.

All forms submitted to Security Services will be retained in their custody on behalf of the employing department. Where the Ministry or Executive Search has initiated the security screening process with the written consent of the individual, copies of the Criminal Records Check and Financial Management Risk Indicator Screening Report will be released to the individual as a matter of routine disclosure.

2.2.1.1 Criminal Records Check (Required for both Level 1 and Level 2 Security Screenings)

The candidate has the option of either providing consent to the Deputy Minister or designate to carry out the criminal records check, or, alternatively, of obtaining the criminal records check directly from the local police service. If the individual wishes to request a correction, they must make a request to the source of the report.

1. Under the first option, the Human Resources Advisor forwards the consent form to Security Services, who subsequently obtains the criminal records check from the police service. Security Services forwards the report to the Human Resources Advisor.
2. Where the candidate has chosen to obtain the criminal records check directly, the police services forward the report directly to the individual. The individual then forwards the report(s) to the Human Resources Advisor.

2.2.1.2 Financial Management Risk Indicator Screening Report (Required for Level 2 Security Screenings only)

The candidate has the option of sitting down with the financial analyst and jointly reviewing their financial credit report directly; or of initially obtaining and reviewing their report and subsequently making it available to the financial analyst.

3. Under the first option, the candidate is referred to the Justice and Solicitor General staff, who provide a secure environment and computer resources and candidate attends a scheduled meeting to access, on-line, their Financial Credit Report for immediate review by the Financial Analyst. The candidate is provided with the web addresses of Financial Credit Report providers (either Equifax or TransUnion) and logs on to the selected site. When the Financial Credit Report appears, the Financial Analyst will review the displayed information, and if necessary clarify information with the candidate.

The Financial Analyst will complete and sign the Financial Management Risk Indicator Screening Report (FMRISR). At the conclusion of the meeting, the candidate signs off of the website and will receive a copy of the completed and signed FMRISR, while Justice and Solicitor General retain the original.

Under the second option, the candidate independently and privately accesses and reviews their Financial Credit Report. In doing so, the candidate would receive a customer access ID and password. These are time limited. For those candidates without access to a personal computer, the Government of Alberta will provide a secure on-site computer. Subsequently, via telephone, the candidate will provide the Financial Analyst with their customer access ID and password and mailing address. The Financial Analyst will access and review the candidates on-line Financial Credit Report. Should it be necessary to clarify information with the candidate, this may be done through a telephone interview. The Financial Analyst will complete and sign the FMRISR, log off the website (no copy of the Financial Credit Report is made) and will send the candidate (through Registered Canada Post) a copy of the signed FMRISR. Justice and Solicitor General will retain the original FMRISR.

4. Under either option, Justice and Solicitor General reports the FMRISR results to the individual's ministry as described in section 2.2.1.
5. The Deputy Minister may consult with advisors regarding the reports that result from the security screenings.

2.3 Information Users

2.3.1 The Individual's Ministry

For prospective employees, screenings would be conducted before an offer of employment is extended. In some situations, the completion of a screening may be required at the time of being short-listed as one of several potential top candidates, or in order to receive certification of being eligible for any future vacant positions. No screening will occur before the individual's written consent is obtained.

The Human Resources Advisor for that Ministry is responsible to ensure that consenting individuals have completed and submitted a Criminal Records Check or Financial Management Risk Indicator Screening as applicable, to their office, or signed a consent form and appropriate application forms to allow the Ministry to collect the information from the contracted agents.

Normally the management representative to whom the position reports will be the Ministry representative evaluating information obtained through the security screenings.

The Human Resource Advisor may also be called upon to assist management in assessing the relevance of a security screening to the position duties. [Appendix 1](#) identifies the users in the individual's Ministry to whom a screening can be disclosed.

2.3.2 Role of Executive Search, CHR

Executive Search within CHR, is responsible for the recruitment of senior level management positions on behalf of the Ministries in the Government of Alberta. In this role, Executive Search becomes the Human Resources Advisor recruiting to senior level positions and is responsible for managing the recruitment process in accordance with the [Public Service Act](#), on behalf of the Ministry that the position will report to. Executive Search will ensure that the proper level of security screening is received prior to an appointment being made.

2.3.3 Role of Security Services, Alberta Justice and Solicitor General

Under the security screening processes described in [Appendix 2](#), the human resources advisor, **only with the prior consent of the individual**, requests Security Services to coordinate a security screening. Security Services transmits personal information to the appropriate agency to conduct the actual screening. Information about the individual is collected from the applicable third party sources identified in sections 1.7.1 to 1.7.3 in Chapter 1.

Security Services does not evaluate information about any individual that is submitted to it by the contracted agencies. See section 3.7, *Disclosure of Personal Information*, in Chapter 3 for a description of Security Services' responsibilities.

Section 40(1)(i) of the *Freedom of Information and Protection of Privacy Act* allows public bodies to disclose personal information to an official of another public body where they are involved in the delivery of a common program or integrated service. As stated at the outset of the PIA, the Government of Alberta as one employer is impacted by the Directive in the delivery of an integrated human resource service and program.

2.3.4 Role of CHR

Except as noted in section 2.3.2 above, CHR does not have any direct involvement in the collection, use and disclosure of personal information collected as a result of a security screening. The staff within CHR may be called upon by Ministries to provide functional expertise in areas related to the Directive.

CHR has the responsibility under the *Public Service Act* for the development and implementation of the Security Screening Directive. Through training and communication initiatives, CHR ensures that the Ministries have an understanding of the Directive and are aware of the screening process and supporting activities.

3.0 PROTECTION OF PERSONAL INFORMATION ANALYSIS

3.1 Collection of Personal Information

Section 33 of the *Freedom of Information and Protection of Privacy Act (FOIP Act)* requires that public bodies have authority to collect personal information. Most often, legislation will give authority for a particular program or activity without authorizing the collection of specific personal information. In these situations, and in this case, section 33(c) of the *Act* applies to the Security Screening Directive.

33 *No personal information may be collected by or for a public body unless*
(c) *that information relates directly to and is necessary for an operating program or activity of the public body.*

Corporate Human Resources (CHR) will not be collecting personal information. Sections 3.1.1 to 3.1.3 as follows, describe CHR's authority to establish government-wide direction in personnel matters (e.g. through the use of policies, directives and regulations). Public bodies that are subject to the *Public Service Act* are required to adhere to corporate directions established by CHR and recognizing that the Government of Alberta is one employer.

Section 3.1.4 describes the affected public bodies' authority to manage personnel activities. The discussion in these sections establishes the setting and implementation of personnel policies as a legitimate operating program or activity.

Section 3.1.5 describes the legislative authority to collect personal information in support of the Directive.

3.1.1 Authority of PSC to Set Personnel Policy

The [Public Service Act](#) [s.6(1)] provides the Public Service Commissioner with the general authority to:

- provide advice on personnel policy, legislation and administration to the Minister Responsible for Corporate Human Resources (CHR) and to the Government of Alberta;
- develop and administer systems to carry out human resource policies and practices;
- manage a comprehensive personnel program for the Alberta Public Service;
- provide advice and assistance to senior department managers on personnel matters; and
- support the Government Reorganization Secretariat.

This general authority establishes the Public Service Commissioner's mandate to develop, apply, and review the appropriate personnel activities for the Alberta

Government as one employer, including setting and maintaining personnel policy and ensuring that policy is applied in a consistent manner across all Ministries.

In the case of the Security Screening Directive, in consultation with the Deputy Minister's Committee, the Public Service Commissioner determined that a Criminal Records Check, and a Financial Management Risk Indicator Screening is required for all new appointments or reclassifications to the positions/classifications identified in the Directive, dependent on the level and function of the position in question.

3.1.2 Application of Directive for New Hires and Appointments

When a position is to be filled by in-service promotion or by limited or open competition, or is exempt from competition, an appointment to the position is subject to certification that the person to be appointed is qualified for the position. A security screening for those positions identified above will be completed as part of that process. (Will this be true for all such positions, or is this something that will be left to the discretion of each Ministry?)

The *Public Service Act* gives the Public Service Commissioner explicit authority to determine appropriate hiring criteria. Sections 17(3) and 18(3) enable the Public Service Commissioner to put in place rules and procedures for competitions and subsequent appointment to a position.

17(3) *Competitions conducted by a department head must be conducted in accordance with the rules and procedures prescribed by the Commissioner.*

18(1) *All appointments to positions in a classification plan shall be made by the department head.*

(2) *When a position*

(a) is to be filled by in-service promotion or by limited or open competition, or

(b) is exempt from competition under section 16(3)(a) or (b),

an appointment to the position is subject to certification that the person to be appointed is qualified for the position.

(3) The certification shall be made in accordance with the directions of the Commissioner and by the persons authorized to do so by those directions.

(4) Appointments made to positions excluded from a classification plan pursuant to section 11 shall be made by order of the Lieutenant Governor in Council on the recommendation of the department head.

3.1.3 Authority of Deputy Ministers to Manage Personnel Activities

While, as noted in the previous section, the Public Service Commissioner has the authority to set personnel policy, the activities required to support these policies are the responsibility of the Ministries. Ministerial authority is derived from the *Public Service Act* and the [Government Organization Act](#).

Section 8 of the *Public Service Act* establishes the responsibilities of the Deputy Head (Deputy Minister) relating to personnel matters.

- 8(1)** *Subject to the general direction of the department head, the deputy head*
- (a) shall oversee and control the attendance, conduct and work performance of the employees in the deputy head's department,*
 - (b) may, subject to any other Act relating to the organization of a department, divide the department into branches and divisions and assign duties to positions as required for the effective performance of the department's functions, and*
 - (c) may appoint an acting officer to have, during the absence of the incumbent, the power and authority of the office for which the acting officer is appointed to act, unless such an appointment is otherwise provided for by any other Act.*
- (2)** *For the purposes of this Act, a deputy head has the powers and may perform the duties of the deputy head's department head.*
- (3)** *A department head may appoint an employee of that department as the acting deputy head of that department, and an acting deputy head so appointed has, during the absence of the deputy head or a vacancy in the office of the deputy head, the powers and duties of the deputy head.*

In addition, the *Government Organization Act* allows for a Minister to establish or operate any program considered desirable:

- 8(1)** *A Minister may establish or operate any programs and services the Minister considers desirable in order to carry out matters under the Minister's administration.*
- (2)** *A Minister may institute inquiries into and collect information and statistics relating to any matter under the Minister's administration.*

Such programs and services could and do include the personnel programs and activities necessary to effectively operate the Ministry and fulfill the responsibilities that are required under Section 8 of the [Public Service Act](#).

3.1.4 Authority to Collect Personal Information

The *Public Service Act* and the *Government Organization Act* as described above in sections 3.1.1 to 3.1.3 above, authorize Corporate Human Resources and the individual Ministries to carry out human resource management activities.

Authority to collect personal information is derived from section 33(c) of the *FOIP Act*.

33 *No personal information may be collected by or for a public body unless*

(c) that information relates directly to and is necessary for an operating program or activity of the public body.

Under the Security Screening Directive, personal information is collected from the prospective or current employee to support a Criminal Records Check, a Financial Management Risk Indicator. As with other screenings, such as reference checks or education verification checks, the results may not necessarily ensure that an individual is able to attend to his/her responsibilities in an appropriate manner, but the screenings serve as a discussion point with the individual should there be any issues identified through the various screening processes. As is the case in all recruitment or reclassification activities, reasonable and diligent judgment should be used in assessing all of the information known about a candidate in making the final decision. The Security Screening Directive adds additional information that must be analyzed and weighed.

As described in section 2.1, *Collection of Personal Information*, the personal information to initiate a screening is supplied by the individual while third parties prepare the reports containing personal information. In support of these two activities, the employer determined:

- the exact personal information which is needed to carry out the screening and no more; and,
- that the content of the screening reports provided to the employer is summary information and limited to that information that provides an indicator.

These reports are prepared by third parties who have established screening processes. As such, the directive identifies classes or position designations that are to undergo the screening.

Use of the personal information obtained from the collection is discussed in section 3.6.

3.2 Manner of Collection of Personal Information

Section 34(1) of the *FOIP Act* establishes direct collection as the primary method for obtaining personal information. The same section also authorizes indirect collection of personal information with the informed consent of the individual.

34(1) *A public body must collect personal information directly from the individual the information is about unless*
(a) another method of collection is authorized by
i. that individual

The intent of section 34 is to ensure that an individual is aware of the type of personal information being used to make a decision concerning him or her.

The personal information provided by the third party agents is an indirect collection of information and is thus subject to s.34(1)(a)(i) of the *FOIP Act*. Criminal Records Checks (completed by local police departments) will only be completed if the individual to whom the check pertains has completed and signed a consent and authorization. (See [Appendix 4](#)). Likewise, screenings that are completed by the Financial Analyst will only be completed if the individual to whom the screening pertains has completed and signed an authorization (see [Appendix 6](#)).

In the case of Criminal Records Checks the individual has the option of obtaining the reports directly and submitting them to his/her Ministry's Human Resources Advisor (Level 1) or Deputy Minister (Level 2). In the case of the Financial Management Risk Indicator Screenings, the individual has the option of obtaining the Financial Credit Report directly and subsequently authorizing the financial analyst access in order to allow for the completion of the FMRIR. See sections 1.6.1 and 1.6.2 for more information. Under the *FOIP Act*, this is a direct collection of personal information in accordance with s. 34(1).

In those instances where the individuals choose to sign a consent authorizing the employing Ministry to obtain Criminal Records Checks and Financial Management Risk Indicator Screenings on their behalf, this is an indirect collection under 34(1)(a)(i) of the *FOIP Act*.

The forms filled out by the consenting applicant for the Criminal Records Check and Financial Management Risk Indicator Screening collect information only on the applicant.

3.3 Accuracy and Retention

3.3.1 Accuracy

The Criminal Records Checks required by the Directive are carried out by a contracted third party: local police services,

The Financial Management Risk Indicator Screening Report information is collected from the Financial Credit Report by a Financial Analyst working for the Justice and Solicitor General. A copy of the FMRIS report is provided to the candidate.

These agents are responsible for the accuracy of the reports they provide – the information that is used to complete the reports is based on information maintained by that organization, or on the basis of information that is submitted to the organization by the individual. If the individual questions the accuracy of the information obtained, they should address their concerns to the applicable contracted agent. The individual will also be given the opportunity to present further information to the Ministry (see 3.4 Right to Request Correction).

As noted in the previous section, individuals have the option of obtaining Criminal Records Checks directly from the police service.

In those cases where the individual has authorized the Ministry to obtain the screening, information that is received from the local police service will be routinely presented to the individual upon request. A copy of the Financial Management Risk Indicator Screening Report will be provided to the candidate directly by the Financial Analyst.

Individuals will be provided the opportunity to address any issues that may be seen in the Criminal Records Check if they are deemed to be relevant to the decision in the appointment or reclassification to the position. Information that is received from the Financial Credit Report will be limited to Financial Management Risk Indicators, and not the actual detailed credit history. Individuals will be provided the opportunity to address any issues identified in the Financial Management Risk Indicator Screening.

3.3.2 Records Retention

Security Services will maintain the original copies, on behalf of the Ministries, of the following information collected as a result of the security screening process:

- Information that is submitted by the individual, which is included on the forms that they complete (see [Appendix 4](#))
- Responses submitted by the individual to the Ministry
- Responses obtained from police agencies to the Criminal Records Check. *No Ministry is to have any personal information as all is to be retained with Security Services
- The Financial Management Risk Indicator Screening, (See [Appendix 5](#))

The records maintained by Security Services will be retained in accordance with the *Administrative Records Disposition Authority*.

Ministries will receive copies of reports from Security Services. These are treated as transitory documents, which are destroyed once they have served their purpose.

A checklist form ([Appendix 3](#)) will indicate whether the screening was completed. This form will be retained by the Ministry on the competition file or the personal file. This form is retained in accordance with the retention and disposition schedules under the [Administrative Records Disposition Authority](#).

3.4 Right to Request Correction of Personal Information

As described in the previous section, requests for corrections must be made to the source of the report. While the Ministry has no authority to correct information collected and reported by a contracted agent, it will afford the individual the opportunity to provide further information or documentation that may result in a correction or annotation to the records. This will be clearly identified to the individual should the need arise.

3.5 Protection of Personal Information

Information obtained by Security Services from the contracted agents is retained in a secure environment at Justice and Solicitor General.

The process by which the personal information is transmitted is identified in section 3.5.1 below.

While Security Services retains custody of the original information on behalf of the employer, the Ministry to whom the individual reports, is responsible for the control of that personal information. Security Services keeps the original information in a secure facility. Filing cabinets will be locked, as will the offices they are contained in. In addition the office area is monitored 24 hours per day by video surveillance.

The rationale for the maintenance of the information by Security Services is to ensure strict protection of the personal privacy of the individuals who have completed to an enhanced security screening. Individuals to whom the information pertains will have a right of access to that information as per the Freedom of Information and Privacy Act.

3.6 Use of Personal Information

Personal information that is collected and reviewed through the implementation of this Directive is only to be used for the purposes described in sections 1.7.1 – 1.7.2 and [Appendix 1](#).

The existence of a positive or negative security screening will not automatically result in the offer or denial of a position or have any impact, positive or negative, on an existing employee. The relationship between the result of the screening and the duties of the position that the individual is applying for is being reclassified to, or holds, will be reviewed on an individual basis. A determination of the consequences of any decision regarding that relationship will be made by the Employer in consultation with legal and/or human resource advisors.

It should be noted however, that the manner in which this process will unfold is a Human Resources matter, and is outside the scope of this PIA.

3.7 Disclosure of Personal Information

Information is disclosed only to the authorized users (see [Appendix 1](#)). *Figure 2*, the information flow diagram will assist in identifying that disclosure. Note that the flow diagram refers to the individuals identified in the Screening Directive (as per [Appendix 1](#)).

The Security Services within Alberta Justice and Solicitor General acts on behalf of the employer and has been authorized by the employer to collect information with an individual's consent and to disclose information only to either the employer or to the individual the information has been collected about and has no authority to use or disclose information on its own. As such, Security Services:

- Is responsible for collecting, maintaining and securing the personal information from the local police and the FMRIS Report (where the individual has consented in writing).
- Discloses to the employer the results of the requested security screenings (see Section 2.2.1 in Chapter 2).
- Maintains custody and protects the information on behalf of the employer.
- Manages the contracts with the third parties who conduct the screenings.

Other than to the individuals to whom the information from the screening relates, there will be no routine disclosures of personal information collected as a result of the Directive. Any request for disclosure of this information must be with the individual's consent or in accordance with section 40 of the *FOIP Act* [e.g. s.40(1)(h) – disclosure for the management or administration of personnel who need it to do their business].

3.8 Disclosure for Research or Statistical Purposes

It is not anticipated that personal information would be disclosed for research or statistical purposes. However, given that there is discretion within the *FOIP Act* to disclose information for research and statistical purposes, any request for information will have to be reviewed by the employer through a Ministry in consultation with CHR.

- Positions as determined by the Ministry Deputy Minister
- Positions of trust where the client relies on the character or truth of the employee
- Positions charged with special status or designation
- Positions dealing with court proceedings and evidence admitted to the court
- Positions in contact with highly confidential/sensitive information or large amounts of cash, goods or restricted drugs.

The security screening results for all positions noted in this directive are reviewed and assessed for any required follow up action by the official(s) listed as having access to the information. In all cases where a Criminal Records Check or Financial Management Risk Indicator Screening is required, the applicants will be given the alternative to provide a certificate from the applicable police force or initially reviewing the credit bureau report themselves. Criminal Records Check information collected through Security Services will be made accessible to the applicant upon request.

Ministries will file a list of the positions determined by the Deputy Minister, that require security screening with the Public Service Commissioner's Office by March 31 of each year.

DEFINITIONS

For the purposes of this Directive the following definitions apply:

Criminal Records Check: involves a screening, for the presence of criminal convictions, against the Canadian Police Information Center (CPIC), based on name and birth date and is conducted by the applicable police force.

Financial Management Risk Indicator Screening: involves a screening for the presence of financial management risk Indicators such as bankruptcies, garnishees, credit payments beyond 90 days, poor credit rating, etc. The screening will be conducted by a Financial Analyst based on a review of Credit Bureau information. Information reviewed will **not** be retained nor disclosed.

- **Enhanced Security Screening:** involves a Criminal Records Check, Financial Management Risk Indicator Screening and the verification of applicant's loyalty.

About this Directive

Authority: *Public Service Act*

Application: Organizations under the *Public Service Act*

Effective Date: 1 August 2008

Contact: Staffing
Executive Search

4.0 POTENTIAL PRIVACY IMPACTS

4.1 Potential Privacy Impacts

Individuals who are applying for or seeking appointment or reclassification to positions that are designated by the Directive will be advised in advance of the requirement for a security screening. This applies to current Government of Alberta employees who are applying for a new position.

Should the security screening identify issues of concern to the employer, individuals will be given an opportunity to provide additional clarifying information. Individuals will be able to contact the credit agency to obtain a detailed report of their financial information. The employer will disclose information it has obtained from a police agency.

Security Services will maintain personal information that is obtained through the security screening. Ministry Human Resources staff will be limited to access only the information that relates to the individuals seeking employment, or employed, by that Ministry.

Individuals must authorize the collection and disclosure of the screening information. (See Release of Information Consent Form – [Appendix 3](#)) Should they choose not to consent, in the case of recruitment, no employment offer would be extended.

4.2 Conclusion

The expectations that citizens have of the need for security and privacy extends not only to the information that government organizations maintain about them, but also to the integrity of the individuals who are hired, appointed, or reclassified to positions of trust within those organizations. Corporate Human Resources, in consultation with the Deputy Ministers, advances that those positions designated in the Security Screening Directive are in positions of trust within the public service. There is a need to properly apply a security screening process to deal with issues that have the potential to impact on the areas of responsibility of the individuals in those positions of trust.

APPENDIX 1: SECURITY SCREENING DIRECTIVE

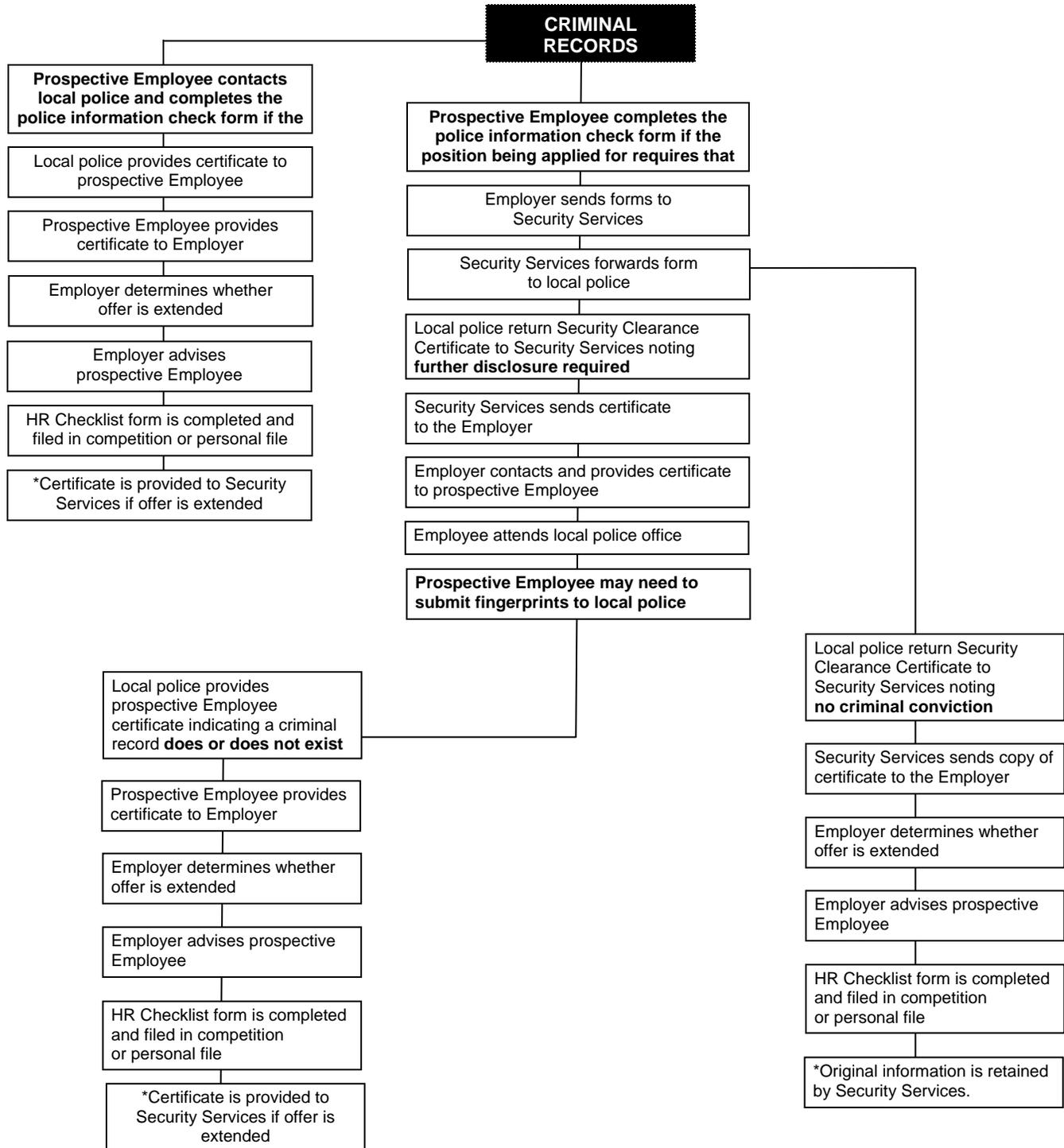
Security screening is required for all appointments or reclassifications to the positions/classifications identified below:

Type of Security Screening: Level 1 –Criminal Records Check		
APPLIES TO:	COLLECTED BY:	INFORMATION DISCLOSED TO:
Senior Officials appointed by Order in Council.	Security Services on behalf of the Ministry.	Deputy Minister of Executive Council or the appropriate Board or Commission Chair, and their legal or human resource advisors as required.
All Management positions in the Alberta Public Service. All Accounting Officers. All Expenditure Officers. Positions as determined by the Deputy Minister.	Ministry Human Resource Director or Executive Search.	Appropriate Deputy Minister, or Management Representative and/or their legal or human resource advisors as required.
Type of Security Screening: Level 2 – Enhanced Security Screening		
APPLIES TO:	COLLECTED BY:	INFORMATION DISCLOSED TO:
Members DM Committee. Members of Ministry Executive Committees. Senior Financial Officers. Positions as determined by the Deputy Minister in consultation with DM, Executive Council.	Criminal Records Check and Financial Management Risk Indicator Screening are collected by Security Services on behalf of the employer.	Deputy Minister Executive Council or appropriate Deputy Minister, their legal or human resource advisors as required.

All positions that require security screening are determined to meet some or all of the following criteria:

APPENDIX 2: SECURITY SCREENING PROCESS (LEVEL 1 & 2)

NOTE: Prior to any security screening, a prospective employee must first complete the “Declaration and Consent to Release Form.”



Information retained by Security Services is accessible to the prospective Employee and/or the Ministry's Deputy Minister.

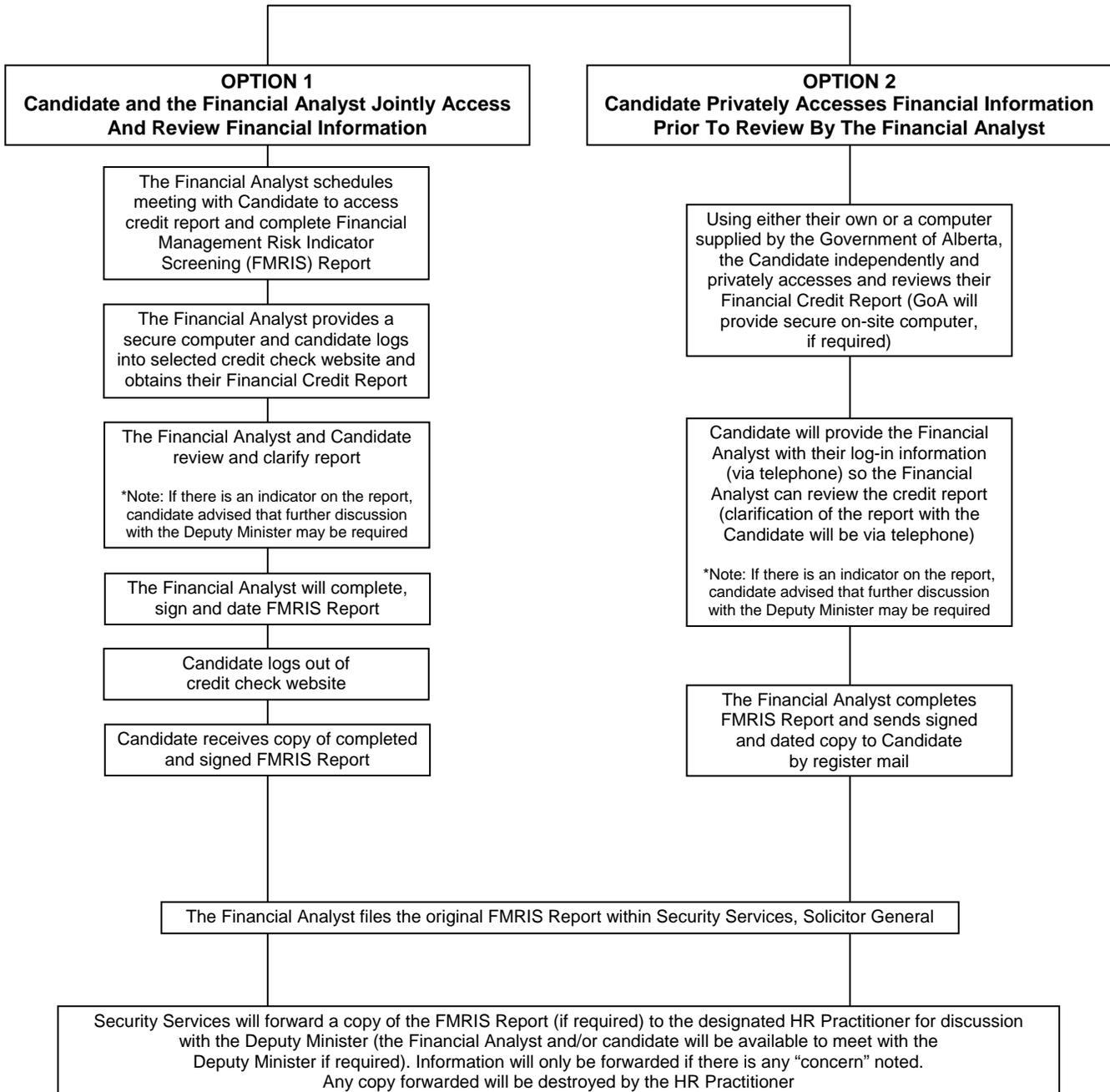
Note: Employer – refers to Executive Search coordinating recruitment/ exemptions of Executive/ Senior Official positions noted on the Security Screening Directive.

For other positions in the Public Service – Employer refers to Human Resources coordinating recruitment, exemptions and reclassifications.

Security Screening Process (continued)

NOTE: Prior to any security screening, a prospective employee must first complete the “Declaration and Consent to Release Form.”

**FINANCIAL MANAGEMENT
RISK INDICATOR SCREENING**



INSTRUCTION SHEET

Level 2: Alberta Public Service Candidate Information on Security Screening

The government has a responsibility to exercise diligence in ensuring that individuals hired into the public service meet security screening requirements. Internal candidates, depending on the nature of the responsibility of their position, and all external hires are required to undergo a security screening to help determine their suitability.

Your consent and authorization is required prior to information being collected.

You have the right to access your information, subject to applicable legislation. Your information is disclosed only to authorized users.

Criminal Records Check

A Criminal Records Check involves a screening for the presence of criminal convictions, against the Canadian Police Information Centre (CPIC). The screening is conducted by the applicable local police force.

You may go the local police department. You should take proper identification, including a birth certificate and/or driver's licence. The required and applicable authorization form will be supplied by the respective police force. You are responsible to forward the information to the Ministry/Human Resource Advisor. A copy of the information will be forwarded to Security Services, Solicitor General & Public Security for retention.

OR

You may authorize the Human Resource Advisor to obtain the security screening (Criminal Records Check) and you must complete, sign and date the applicable Police Information Check authorization and the Declaration and Consent to Release Information Form.

1. The Police Information Check authorization must be completed by you.
2. Personal information must be fully completed.
3. A representative of the ministry must complete the section entitled Verification of Applicant's Identification. The person verifying the identification must print their name and sign the form and provide their phone number in the spaces provided. They must also verify and check off which types of identification were presented to them (minimum 2).
4. The **waiver** on the form **must be completed, signed and witnessed**.

Financial Management Risk Indicator Screening

A Financial Management Risk Indicator Screening involves a screening for the presence of financial management risk indicators such as bankruptcies, garnishees, credit payments beyond 90 days, poor credit rating and the like. The purpose of this screening is to identify the potential for risks to the employer where an individual has fiscal responsibility for significant budgets and/or expenditures.

Details of your financial and credit information will be viewed electronically by Solicitor General & Public Security's Financial Analyst. This information will **not** be retained nor forwarded to the

employer, however the Ministry will receive a summarized Financial Management Risk Indicator Screening Report, which may form the basis of further discussion with the Ministry Deputy Minister.

Solicitor General & Public Security will provide a secure environment and computer resources and you will attend a scheduled meeting to access, on-line, your Financial Credit Report. When you have accessed your Financial Credit Report, the Financial Analyst will review the displayed information and discuss with you. The Financial Analyst will complete and sign a summary Financial Management Risk Indicator Screening Report. You will then log out of the credit check website. The Financial Analyst will provide you with a copy of the Financial Management Risk Indicator Screening Report; a copy will be forwarded to the Human Resource Advisor and the original Financial Management Risk Indicator Screening Report will be retained by Security Services, Solicitor General & Public Security.

OR

You may privately and independently access and review your Financial Credit Report. You will be responsible to contact, the Financial Analyst (via telephone) and provide your Financial Credit Report User Identification and Password and a mailing address. The Financial Analyst will access and review the information and clarify information with you via telephone. The Financial Analyst will complete and sign a summary Financial Management Risk Indicator Screening Report and sign off the website. You will be provided (through Registered Canada Post) with a copy of the signed Financial Management Risk Indicator Screening Report, a copy will be forwarded to the Human Resource Advisor and the original Financial Management Risk Indicator Screening Report will be retained by Security Services, Solicitor General & Public Security.

INSTRUCTION SHEET

Retroactive Collection of Financial Management Risk Indicator Screening

Reinstatement of Financial Management Risk Indicator Screening

As you are aware, the position that you occupy with the Government of Alberta is subject to a Level 2 – Enhanced Security Screening. This level of Security Screening is comprised of three elements:

- *Security Clearance Check (Criminal Records Check)
- *Financial Management Risk Indicator Screening (FMRIS)

Since November 2004, there has been a moratorium on the collection of FMRIS information. This moratorium has now been removed and the FMRIS will be reinstated. This reinstatement is retroactive to November 2004 and as you have been appointed to a position requiring Level 2 – Enhanced Security Screening since that time, you will now be required to complete the (FMRIS).

The FMRIS involves a screening for the presence of financial management risk indicators such as bankruptcies, garnishees, credit payments beyond 90 days, poor credit rating and the like. The purpose of this screening is to identify the potential for risk to the employer where an individual has fiscal responsibility for significant budgets and/or expenditures.

Details of your financial and credit information will be viewed electronically by Solicitor General & Public Security's Financial Analyst. This information will **not** be retained nor forwarded to the employer, however the Ministry will receive a summarized Financial Management Risk Indicator Screening Report (sample attached), which may form the basis of further discussion with the Ministry Deputy Minister.

Solicitor General & Public Security will provide a secure environment and computer resources and you will attend a scheduled meeting to access, on-line, your Financial Credit Report. When you have accessed your Financial Credit Report, the Financial Analyst will review the displayed information and discuss with you. The Financial Analyst will complete and sign a summary Financial Management Risk Indicator Screening Report. You will then log out of the credit check website. The Financial Analyst will provide you with a copy of the Financial Management Risk Indicator Screening Report; a copy will be forwarded to the Human Resource Advisor and the original Financial Management Risk Indicator Screening Report will be retained by Security Services, Solicitor General & Public Security.

OR

You may privately and independently access and review your Financial Credit Report. You will be responsible to contact, the Financial Analyst (via telephone) and provide your Financial Credit Report User Identification and Password. The Financial Analyst will access and review the information and clarify information with you via telephone. The Financial Analyst will complete and sign a summary Financial Management Risk Indicator Screening Report and sign off the website. You will be provided (through Registered Canada Post) with a copy of the signed Financial Management Risk Indicator Screening Report, a copy will be forwarded to the Human Resource Advisor and the original Financial Management Risk Indicator Screening Report will be retained by Security Services, Solicitor General & Public Security.

Your consent and authorization is required prior to information being collected. You have the right to access your information, subject to applicable legislation. Your information is disclosed only to authorized users.

Attached is the Declaration and Consent to Release Information Form

Consent Forms

Level 1 - (Prospective Employees)

Sample Release of Information Consent Form

DECLARATION AND CONSENT TO RELEASE INFORMATION

I, _____, authorize Security Services on behalf of
(name of individual)
_____, Government of Alberta, to collect the records related to the
(name of organization)
Security Screening as per the following:

The following screening will be conducted:

- Criminal Records Check _____ Applicant initials
- Financial Management Risk Indicator _____ Applicant initials

These results are to be used only for the purpose of addressing the screening criteria as established in the Security Screening Directive, and only as a requirement for the position for which I am being considered. The information from the screening will be shared with

_____,
(Please Print:: HR representative name, address and phone #)
who is charged with responsibility of reviewing it for the purpose of this appointment/ reclassification.

Collection, use, disclosure, security and retention of information are subject to the *Freedom of Information and Protection of Privacy Act*.

Applicant Signature

Date

Witness Signature

Date

Witness Name

Send completed forms to

XXXXXXXXXXXXX
Security Services
Solicitor General
11th Floor, Legislature Annex
9718 – 107 Street
Edmonton, Alberta T5K 1E4

Level 2 – (Prospective Employees)

Sample Release of Information Consent Form

DECLARATION AND CONSENT TO RELEASE INFORMATION

I, _____, authorize Security Services on behalf of
(name of individual)
_____, Government of Alberta, to collect the records related to the
(name of organization)
Security Screening as per the following:

The following screening will be conducted:

- Criminal Records Check _____ Applicant initials
- Financial Management Risk Indicator _____ Applicant initials

These results are to be used only for the purpose of addressing the screening criteria as established in the Security Screening Directive, and only as a requirement for the position for which I am being considered. The information from the screening will be shared with

_____,
(Please Print: HR representative name, address and phone #)
who is charged with responsibility of reviewing it for the purpose of this appointment/ reclassification.

Collection, use, disclosure, security and retention of information are subject to the *Freedom of Information and Protection of Privacy Act*.

Applicant Signature

Date

Witness Signature

Date

Witness Name

Send completed forms to

XXXXXXXXXXXX
Security Services
Solicitor General
11th Floor, Legislature Annex
9718 – 107 Street
Edmonton, Alberta T5K 1E4

Levels 1 and 2 – (Current Employees)

Sample Release of Information Consent Form

DECLARATION AND CONSENT TO RELEASE INFORMATION

I, _____, authorize Security Services on behalf of
(name of individual)
_____, Government of Alberta, to collect the records related to the
(name of organization)
Security Screening as per the following:

The following screening will be conducted:

Level 1 – Criminal Records Check

Security Clearance Check Form (Criminal Records Check) _____ Employee initials

Level 2 – Enhanced Security Screening

Security Clearance Check Form (Criminal Records Check) _____ Employee initials

Financial Management Risk Indicator Screening Form _____ Employee initials

These results are to be used only for the purpose of addressing the screening criteria as established in the Security Screening Directive, and only as a requirement for the position for which I am being considered. The information from the screening will be shared with _____, who is charged with responsibility of reviewing it for the
(HR Representative name and fax #)
purpose of this appointment/reclassification.

Collection, use, disclosure, security and retention of information are subject to the *Freedom of Information and Protection of Privacy Act*.

Employee Signature

Date

Witness Signature

Date

Witness Name

Send completed forms to

XXXXXXXXXXXXX
Security Services
Solicitor General
11th Floor, Legislature Annex
9718 – 107 Street
Edmonton, Alberta T5K 1E4

ALBERTA

Checklist Form

Name of Candidate/Employee _____

Please fill in the appropriate information which reflects one of the following transactions:

<p>Competition No.: _____</p> <p>Exemption No.: _____</p> <p>Reclassification/Position No.: _____</p>

An X is placed beside the appropriate security screening check(s) which will indicate the screening was completed.

_____ Criminal Records Check	_____ Completed	_____ Date
_____ Financial Management Risk Indicator Screening	_____ Completed	_____ Date

Signature of Human Resource Consultant/Human Resource Advisor

NOTE: This form is to be placed on the competition file or the personal file. The original copies of the security screening are maintained by Security Services, Justice and Solicitor General.

APPENDIX 3: POLICE SERVICE SECURITY SCREENING CHECK

(See attached sample form)

**APPENDIX 4: ALBERTA FINANCIAL RISK MANAGEMENT INDICATOR
SCREENING****Financial Management Risk Indicator Screening Report****Alberta Public Service**APPLICANT NAME:

ITEMS ON CREDIT REPORT		YES	NO
1.	Bad Debt write offs	<input type="checkbox"/>	<input type="checkbox"/>
2.	Paid Collections	<input type="checkbox"/>	<input type="checkbox"/>
3.	Unpaid Collections	<input type="checkbox"/>	<input type="checkbox"/>
4.	Bankruptcies	<input type="checkbox"/>	<input type="checkbox"/>
5.	Discharged from Bankruptcy (not applicable, leave blank)	<input type="checkbox"/>	<input type="checkbox"/>
6.	ABM or Bank Frauds	<input type="checkbox"/>	<input type="checkbox"/>
7.	Active Judgments	<input type="checkbox"/>	<input type="checkbox"/>
8.	Paid Judgments	<input type="checkbox"/>	<input type="checkbox"/>
9.	Ratings above R2 (Revolving Credit) or I2 (Installment Credit)	<input type="checkbox"/>	<input type="checkbox"/>
10.	NSF Cheques	<input type="checkbox"/>	<input type="checkbox"/>

Yes to any of these items indicates one or more of these will be on the individual's credit file._____
GoA Financial Analyst (*please print*)_____
Signature_____
Date

