



BC Refugee Claimant Housing Referral and Data Management Project

Minutes of the CHARMS Advisory Meeting #11

Wednesday October 27, 2021 - 1:00pm (Zoom)

Present: Marzieh Nezakat (MOSAIC), Alexandra Dawley (MOSAIC), Sherman Chan (MOSAIC), Khim Tan (MOSAIC), Jacqueline Sarvini (MOSAIC), Floorance Faqiri (MOSAIC), Joni Rose (MUNI), Demetrius Schwab (Union Gospel Mission), Julia Wu (BC211), Thanh Lam (MAP Co-Chair/MPNH), Jenny Moss (MAP BC Executive)

Guests: Gerald Rigier (Privacy Consultant), Dominic Vogel (Security Consultant)

Introductions

Meeting Chair: Jackie Sarvini (MOSAIC)

- Jackie provided a welcome to everyone and an acknowledgement that she was speaking from the unceded territories of the Coast Salish people and that our work must acknowledge and affirm the reconciliation process.
- Jackie also acknowledged the generous financial support of Ministry of Municipal Affairs.
- Introductions: especially a warm welcome for Floorance Faqiri, new BC CHARMS Project Assistant.
- Agenda for 11th Advisory Committee meeting was reviewed and approved.

Discussion on the BC CHARMS Database

Privacy Impact Assessment (PIA) – Gerald Rigier

[Please see slides that outline Gerald's presentation exactly, as well as the latest PIA attached.]

Components of presentation:

- **Signature Section:** Alexandra will sign for MOSAIC and Thanh for MAP BC
- **Description of Scope, System Flow and Data Flow**
The scope is the BC CHARMS system itself.
- **Assessment of existing controls against government requirements** completed, but also compared against best practices using the CSA Model Code that is the industry standard for PIA's.
- **Risks** all outlined and responses: provided a mitigation strategy for each risk or they are accepted.
- **Documentation** will all be in place to support the report.

Brief notes:

- Gerald involved early so that there is time to address the risks before the system goes live.

- PIA document is provided for internal use, and the content will be incorporated into a training package which will be a part of the training end users will receive.
- List of risks will evolve over time and Gerald is addressing all known risks at this point.

Mitigation Strategies: many of which are in development

- **Accountability** – Implement a Participation Agreement between MOSAIC and Settlement Agencies/Housing Providers; implement a set of policies and procedures specific to BC CHARMS.
- **Consent** - Ensure that Settlement Workers can explain the consent form in a way that clients can understand.
- **User Agreements** – Implement a User Agreement that all users must sign before being given access to the BC CHARMS database.
- **Security** - Privacy & Security Awareness training will be implemented; implement an auditing program (i.e. who does the auditing and how often, and what happens to reports generated from the auditing); Implement a Business Continuity/Disaster Recovery Plan.

Questions:

- **Joni asked for more of an explanation about:**
 - **Auditing procedure** – well explained in the PIA Auditing section.
 - **Consent** – do clients understand the full pathway of how their information may be shared from one user to another?

There are different levels of consent and Level 2 consent received by settlement worker will be more detailed and verifies that the client understands what he/she is sharing with the settlement worker.

Level 3 consent applies to the most secure level and definitely outlines to the client that their information is being shared at multiple levels.

Jackie will share both the PIA and STRA Documents with the Minutes – please send her any questions to: jsarvini@mosaicbc.org to share with Gerald and Dominic.

Security Threat Risk Assessment (STRA) – Dominic Vogel

[Please see slides that outline Dominic's presentation exactly, as well as the latest STRA attached.]

- Goal of the STRA is intertwined with the PIA – so some of the risks will be repeated from PIA presentation, but today Dominic looked more at the key technical security strategies to assure security.
- Assessed security documentation that the vendor provided in order to identify key risks. There was nothing that was very problematic once policies and procedures are fully developed plus privacy and security training is designed and implemented.
- **Dominic shared a slide of the Risk Table**
 - Risk #3 - Multi factor authentication which extends security check via a code sent to a separate device.

- Risk #4 - Password Best Practices – working with Apricot to make sure their practices are indeed the most secure, e.g. 10 characters, logged out after too many attempts, screening out common passwords etc.
- Risk #5 - Vendor owned encryption system – the customer does not own it and so there is a risk that Apricot could share information – unlikely, but it needs to be stated and understood. (Client-side encryption is very expensive)
- Risk #6 - Review and auditing process needs to be well clarified: e.g. frequency (suggest quarterly) and documented.
- Risk #7 -Vendor provided security documents were not recent/updated – it is a bit of a red flag and needs to be reviewed and understood.
- Risk #8 - Audit process documents also not available or updated.

Questions:

- **Joni asked to explain the red flags again.**

- It is not as though we cannot certify the system as secure, but this situation of out-of-date documentation gives us a moment to pause – they are outdated resources.
- **Joni** – so it is not that the mechanisms do not exist, but the security certificates are not revised regularly enough or provided frequently enough. (2 years old) Would like to see vendor provide more recent documents. **Dominic** agreed – the revisions need to be done on a more regular or ongoing basis – there has been nothing provided in the last year.
- **Marzieh** will follow up – more a matter that it needs to be raised with Apricot. Apricot will provide the latest version once out with the consultant.
- Jackie thanked the two consultants for their participation at the meeting.

Updates on the BC CHARMS Sub-Projects

Report Book & Housing Central Conference

After compiling pictures and written draft the team has submitted the report book, it has five themes based on input from claimants and settlement workers:

- 1) Who belongs? Stories of claimants in their new environments and if they belong.
- 2) Am I eligible? Stories of claimants navigating the rental market and if they feel eligible.
- 3) What makes a home? What a home looks like to them both physically and emotionally.
- 4) Where do I go? Challenges to access to services and what they would do differently had they known.
- 5) The Future is bright – resiliency and hope for the future.

These themes will be used at *BCNPHA Housing Central conference on November 16 from 1:15 – 2:30pm – using anonymous videos of claimants and housing providers as well as a demo of BC CHARMS system.

*See more information about the workshop [here](#) T11 Creating Safer Homes for Refugees

Innovative Housing Solutions

The two contracted researchers submitted a first draft: including enlightening statements about housing challenges and the shame of living in sub-par housing like basement suites. The report will be available in near future and will be a useful piece of research.

Refugee Claimant Navigation Website

A simple website for non-English website – it will only have very basic information and provide help in making the first steps – e.g. health and legal services. It will not replace other more elaborate websites that already exist, but it will be a stepping-stone to reach the settlement agencies and providers claimants want to join. As such it will use very simple illustration-based information for non-English speakers easy use.

Database

Since July they have been working with Social Solutions and the information provided from the questionnaires and interviews the BC Charms team have tried to include all the suggestions, including first and foremost:

- Robust security system
- Different user-level access
- Up to date housing availability
- Seamless referral process

It will use the same collaborative referral system that the agencies are used to.

No questions were asked, but please send Jackie any questions after the fact.

Next Meeting will be communicated within 3 weeks of the date.

Question

- **Jenny Moss (MAP)** Do we have a new representative of the Housing Working Group now that Derek Chu has stepped down as co-chair and member of the Advisory Committee?
- **Marzieh** – agreed, there is a need for a MAP HWG Co-chair to be present on the committee and Marzieh cannot as with her job that would be a conflict of interest. In addition the other HWG co-chair, Doug Peat, is not available.

Suggested that the HWG could discuss this tomorrow, October 28.

Jenny suggested the committee could provide an agreed representative at the meeting – agreed.

Marzieh added that meetings will continue, not as frequently, but it is important that the sector representatives do provide feedback and approve of the decisions made especially through the implementation stage. Without MAP participation and feedback the project cannot continue – so meeting attendance and participation is needed.

- **Demetrius:** question re: user access – has there been any decision about who will be able to sign a Participation Agreement and have access?
Marzieh – yes, everyone who uses the system must sign the Agreement and receive training.

MOSAIC will start promotion phase soon and that will be carried out agency by agency. A representative who will be the user who can sign the agreement will be identified and fully trained using the excellent training Social Solutions has developed plus another package on Privacy and Security to ensure users know how to handle data correctly.

MAP Co-chairs will work with MOSAIC to decide who to approach as potential users.

Adjourned