

Communications Security
Establishment Commissioner

The Honourable Robert Décary, Q.C.



Commissaire du Centre de la
sécurité des télécommunications

L'honorable Robert Décary, c.r.

TOP SECRET//SI//CEO

Our file # 2200-68



The Honourable Peter MacKay, P.C., M.P.
Minister of National Defence
101 Colonel By Drive
Ottawa, Ontario
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Dear Mr. MacKay:

The purpose of this letter is to provide you with the results of a review of CSEC's Operational and Production Coordination Centre (COPCC). The review focused on the activities of the Events and Exercises (E&E) Section of the COPCC in support of two major events [REDACTED]. This review was conducted under my authority as articulated in Part V.1, paragraph 273.63(2)(a) of the *National Defence Act*. Based upon the information examined and the interviews conducted, CSEC conducted its support to major events through the COPCC in accordance with the law and ministerial direction.

The objectives of the review were to acquire detailed knowledge of and document the activities of the COPCC in general and of the E&E Section and its activities in support of major events in particular; to assess whether the foreign intelligence activities conducted in support of the two major events [REDACTED] complied with the law and ministerial requirements; and to assess the extent to which CSEC protected the privacy of Canadians in carrying out those activities in support of the major events. I paid particular attention to CSEC's processing of requests for and associated releases of information about Canadians suppressed in foreign intelligence reports produced in support of the major events.

At the outset of the review, it was my belief that since the COPCC may be operating in an environment of high pressure or even crisis during the conduct of a major event, the possibility of an error occurring, in either procedure or judgement, may be greater than during normal day-to-day operations. The potential impact on the privacy of Canadians or non-compliance with the law while conducting certain of these activities could be significant. However, I conclude that the

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activities conducted by the E&E Section in support of major events do not appear to present any greater risk to the privacy of Canadians than activities conducted by other sections of CSEC.

I found that CSEC's associated policies and procedures were appropriate and provide sufficient direction to employees respecting the protection of the privacy of Canadians. CSEC's use of temporary policy instruments [REDACTED] to streamline approval processes for identity management, "actions-on" and sanitizations were appropriate. Both CSEC managers and their employees were aware of the policies and procedures and CSEC managers routinely and closely monitored support to major event activities to ensure the activities complied with the governing authorities. However, CSEC's operational instructions provide only limited direction specific to the COPCC. It is a positive development that CSEC has recognized this gap and is developing an operational instruction respecting the activities of the COPCC.

The enclosed report contains detailed information on my findings as well as related issues. I made no recommendations. CSEC officials were provided an opportunity to review and comment on the report, for factual accuracy, prior to finalizing it.

If you have any questions or comments, I will be pleased to discuss them with you at your convenience.

Yours sincerely,



Robert Décary

Enclosure: (1)

c.c. Chief, CSEC

Office of the
Communications Security
Establishment Commissioner



Bureau du
Commissaire du Centre de la
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**A Review of CSEC'S COPCC and its activities and those SIGINT
activities conducted in support of Two Major Events [REDACTED]**

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I. AUTHORITIES

The review was conducted under the authority of the Commissioner as articulated in Part V.1, paragraph 273.63(2)(a) of the *National Defence Act* ("NDA"), and in accordance with the Ministerial Authorizations ("MAs") and Ministerial Directives ("MDs") that indicate that CSEC activities will be subject to review by the CSE Commissioner or that require CSEC to assist the Commissioner in the exercise of reviews.

II. INTRODUCTION

In its role as a central coordination nexus in CSEC activity, at any given time the CSEC Operational and Production Coordination Centre (COPCC) may operate under all three parts of CSEC's mandate. This review focused on the activities of the Events and Exercises Section in support of two major events [REDACTED] and under parts (a) and (c) of CSEC's mandate.

Rationale for conducting this review

Major events carry with them a number of obligations and implications for the Government of Canada (GC) [REDACTED]

[REDACTED] Likewise (depending on the nature of the event), [REDACTED]

[REDACTED] the GC may call upon CSEC for the provision of foreign intelligence. From a security standpoint, depending on the nature of the event, [REDACTED]

[REDACTED] This being the case, the GC will employ a variety of available security agencies in a joint manner in order to accomplish the tasks at hand. With its unique mandate, as well as its range of capability and skill-sets, CSEC will receive requests from law enforcement and national security agencies (channelled through either the Royal Canadian Mounted Police or the Canadian Security Intelligence Service) as part of this joint effort. In this regard, CSEC is a valuable asset in ensuring the effectiveness [REDACTED] in any major event.

Since the CSEC COPCC may be operating in an environment of high pressure (or even crisis) during the conduct of a major event, the possibility of an error occurring, in either procedure or judgement, may be greater than during normal day-to-day operations.

The potential impact on the privacy of Canadians or non-compliance with the law while conducting certain of these activities could be significant. This is the first review of the activities of the COPCC. [REDACTED]

¹ Activities of the former Canadian SIGINT Operations Centre (CANSOC) were captured in several past reviews.

[REDACTED] both of which offer good examples of activities conducted in support of major events. It is for these reasons that the Commissioner selected the COPCC and activities conducted in support of major events for review.

III. OBJECTIVES

The objectives of the review were:

- to acquire a detailed knowledge and understanding of the role, organization, makeup and activities of the COPCC in general and the Events and Exercises ("E&E") Section in particular;
- to acquire detailed knowledge of, and to document, CSEC's activities in support of major events generally;
- to assess whether the SIGINT activities conducted in support of two major events [REDACTED] complied with the law;
- to assess the extent to which the SIGINT activities conducted in support of two major events [REDACTED] were conducted in accordance with the requirements of applicable MAs and MDs; and
- to assess the extent to which CSEC protected the privacy of Canadians in carrying out the SIGINT activities in support of [REDACTED]
[REDACTED]

IV. SCOPE

The review focused on the COPCC and those SIGINT activities conducted in support of [REDACTED]
[REDACTED]

In addition to acquiring detailed knowledge about the COPCC and activities in support of major events, the Commissioner's office examined:

- the legislative and policy framework, as well as the procedures followed by CSEC relating to the COPCC and its activities conducted in support of major events;
- the amount and treatment of private communications and information about Canadians by the COPCC in its activities conducted in support of major events;
- the extent to which technology was used and other efforts were applied by the COPCC in its activities conducted in support of major events to protect the privacy of Canadians; and

- a sample of the communications collected by SIGINT in support of the two major events [REDACTED] and associated reporting.

V. CRITERIA

A) Legal requirements

The Commissioner expected that CSEC conducted its COPCC and those SIGINT activities in support of major events in accordance with the *NDA, Privacy Act, Criminal Code, Canadian Charter of Rights and Freedoms*, and any other relevant legislation and Justice Canada advice.

B) Ministerial requirements

The Commissioner expected that CSEC conducted its COPCC and related activities in support of major events in accordance with ministerial requirements;

C) Policies and procedures

The Commissioner expected that CSEC:

- i) had appropriate policies and procedures that guide its COPCC and related activities conducted in support of major events and provide sufficient direction respecting legal and ministerial requirements;
- ii) had employees who are aware of, and complied with, the policies and procedures; and
- iii) had an effective management control framework to ensure that the integrity and lawful compliance of COPCC and activities conducted in support of major events were maintained on a routine basis, including appropriately accounting for important decisions and information relating to compliance and the protection of the privacy of Canadians.

VI. METHODOLOGY

The Commissioner's office examined applicable written and electronic records, files, correspondence and other documentation relevant to the COPCC and activities conducted in support of major events, including policies and procedures, and legal advice².

Interviews were conducted with managers and other personnel involved in the COPCC and activities conducted in support of major events.

² The Commissioner's office understands that CSEC's disclosure of any legal advice would not amount to a waiver of any privilege, including solicitor/client privilege that attaches to the advice

As a first step, the Commissioner's office documented and described the COPCC in terms of its organizational, administrative, and operational makeup, CSEC's activities, processes and systems utilized in supporting major events; the legislative and policy framework; and ensured a common understanding of concepts and terminology. Subsequently, we assessed CSEC's conformity with the criteria and developed conclusions respecting the objectives. This is a report of the outcomes of the review.

VII. BACKGROUND

As the first stage of this two-track review, a study of the COPCC was conducted. This provided the necessary background understanding of what is, in simple terms, the nerve centre for CSEC in any major event.

A) COPCC Description

The CSEC Operational Production and Coordination Centre (COPCC) is the new Operational Coordination directorate, which was created within the Director General for SIGINT Programs (the centre for [REDACTED] within SIGINT). Colloquially referred to as "The Floor", it is at the same time both a physical entity and a concept.

COPCC was formally established [REDACTED] as it grew from a 24/7 watch office under the name CANSOC, to encompass three distinct teams, each with a distinct function. It continues to evolve today as requirements demand. Situated on the second and fourth floors of the Sir Leonard Tilley building, its stated mission is to become the CSEC Cryptologic Operational & Coordination Centre of excellence by contributing to CSEC's operational integrity through its 24/7 coordination and surge capability.

1. Purpose of the COPCC

The COPCC essentially serves as the central nervous system of CSEC through its interactions with CSEC clients, partners and various entities within CSEC itself. The COPCC purpose is in part to provide an increased range of co-ordination when an activity or event falls outside of the "business as usual" category. In this sense, it is an event management centre, where experts from throughout CSEC can assemble to co-ordinate on a high priority incident or event.³ However, that is not the COPCC's sole purpose. It is the 24/7 operations centre for CSEC and as such the COPCC is the watch office, systems monitor, and fulfils various other responsibilities. Much of the day-to-day work that the COPCC continues to perform today was inherited from the CANSOC. Much of this work culminates in a daily operations brief that the COPCC Director provides to the Executive Committee (ExCom), including the Chief of CSEC.

³ CSEC publication [REDACTED] March [REDACTED]

2. Origin and history of concept development

[REDACTED]

The notion of the COPCC was originally articulated in the CSE Vision [REDACTED] although its need was recognized well before that document was produced.

“We will coordinate current operations across the SIGINT program through the use of event managers and a centralized operations structure that draws on resources from all areas in SIGINT and across CSE. Our success in all facets of our mission will depend on our ability to work together on the priority issues of the day. In order to facilitate this, we will create a centralized operations structure that will bring together critical staff from [REDACTED] to concentrate on top priorities. The organization will have full decision-making authority for all the key aspects of the SIGINT cycle related to the top priorities of the day, and will operate 24/7. It will be led by experienced event managers, with specialist staff moving in and out as required.”⁴

The parallel document SIGINT [REDACTED] also articulated the need for integration. In the opinion of CSEC management, “things were getting too big” and as events and crises presented themselves, no one area of responsibility could satisfactorily answer the need. An increased level of co-ordination was called for and the COPCC was designed to meet that need.⁵

In [REDACTED] during a briefing to the Executive Committee (ExCom), the proposal was made to “Create a Director Operational Coordination, responsible for an operations centre (“The Floor”) where the multidisciplinary teams running [REDACTED] operations (i.e., the highest priority operations) are housed”.⁶ Key duties identified during this briefing included:

- Manage the day-to-day SIGINT operations supporting [REDACTED] priorities;
- Build a “Floor” infrastructure that can accommodate the addition of watchkeepers from [REDACTED]
- Improve service and responsiveness to the Canadian Forces and other operational clients;

⁴ CSE [REDACTED] “Our Vision and Strategy” [REDACTED] page 72. Note: CSE [REDACTED] gave rise to a second document entitled “SIGINT [REDACTED]”, which served as SIGINT’s planning document and blueprint to guide its evolution over the next five years.

⁵ Interview with Director COPCC [REDACTED]

⁶ SIGINT Organizational Strategy Proposal Documentation for Human Resources [REDACTED] e-mail from Policy and Review Advisor, External Review and Policy Management [REDACTED]

- Enhance skill levels available in quiet hours; and
- Provide additional flexibility in the use of space through open concept, and standard footprints.

Prominent among the planned changes was the implementation of "The Floor" (i.e. the COPCC), which would bring elements from across SIGINT together to focus exclusively on [REDACTED] requirements. In essence, a target team to deal with top priority requirements by co-locating experts from the [REDACTED] areas of all [REDACTED] directorates general (and potentially [REDACTED]) a perceived arrangement that was likened to a "cryptologic microcosm". The first phase called for the creation of the COPCC within existing spaces, calling for modest reconfiguration during the fourth quarter of the [REDACTED] fiscal year. It was forecast that the creation of the full "Floor" would require significant physical and network reconfiguration beginning in fiscal year [REDACTED] depending on status of the accommodations plan.⁷

In [REDACTED] the new [REDACTED] announced the operational start-up of Phase I of the COPCC. Phase I brought together critical staff from across the organization to work on CSEC's highest operational priorities [REDACTED]. The concept also incorporated the [REDACTED] Help Desk and hosted the IT Service Desk. At this point, the team was assembled in a practical sense; however, the physical workspace that has come to be known as the "Floor" was still in the planning phase.⁸

In terms of concept development, any plan will naturally evolve over time as the SIGINT environment and [REDACTED] priorities develop based on changing conditions. In [REDACTED] the "CSEC Operational Production and Coordination Centre (COPCC) Two Year Strategic Work Plan for [REDACTED] and [REDACTED]" was released which captured and articulated the more refined vision and plan for the COPCC.⁹

The [REDACTED] was used as the pilot project during the COPCC implementation. The [REDACTED] was an all-encompassing task that was [REDACTED]. Within CSEC management, it was felt there was a need for an increased level of coordination and supporting mechanisms were required to achieve the goals with respect to the realities of a 24/7 operation [REDACTED].

In the original plan and stand-up of the COPCC, the stand-alone section of Events and Exercises (E&E) (to include manpower, roles, and responsibilities), was not envisioned,

⁷ Ibid.

⁸ Extract from [REDACTED] e-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

⁹ See CSEC Operational Production and Coordination Centre (COPCC) Two Year Strategic Work Plan for [REDACTED] and [REDACTED] e-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

¹⁰ CSEC publication [REDACTED]

per se. The responsibilities currently handled by E&E were seen as responsibilities that would be administered by the COPCC as a whole. In light of both [REDACTED] events [REDACTED] the E&E section, along with its tasks and roles, became one of the operational focal points of the COPCC. The idea of the E&E Section was originally recommended in the [REDACTED] ¹¹ (see below). The current manager of the E&E section and one other member of her team are employed in the COPCC under floating MOUs ¹². Staffing for the other available position continues. ¹³ In effect, the E&E Section exists, but it is not actually established in terms of job descriptions and job classification. ¹⁴ This being the case, the E&E Section remains a work in progress.

3. Organization

The COPCC as a physical entity is embodied by "The Floor"; an operations and event management centre found on the Fourth Floor of the Sir Leonard Tilley Building in the Confederation Heights region of Ottawa, as well as a day to day operations centre located on the Second Floor of the same building. However, as a concept, the COPCC spreads throughout CSEC and beyond into the wider Canadian security and Intelligence community.

¹¹ [REDACTED]

¹² Interview with E&E Manager [REDACTED] See also e-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

¹³ Interview with Director COPCC, [REDACTED] See also e-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

¹⁴ Interview with Director COPCC, [REDACTED] See also e-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

4. Responsibilities, tasks and services

The COPCC is divided into three broad areas of responsibility, with each section covering a variety of tasks and duties. These include:

[REDACTED]

The [REDACTED] is built around the operations and watch centre historically known as the Canadian SIGINT Operations Centre (CANSOC). This section monitors the general cryptological environment [REDACTED]

[REDACTED] In its role as a watch centre, the [REDACTED] will, during silent hours, take remedial action in response to specific issues, notifies the internal and external user communities of incidents, and will recall specialists as required to address the most pressing issues. The [REDACTED] is the Canadian link in the wider Five-Eyes [REDACTED] community and remains in constant contact with its counterparts in the USA, the UK, Australia and New Zealand. Likewise, it serves as CSEC's link into the Canadian intelligence and security network of operations centres such as the RCMP National Operations Centre and the DND/CF National Defence Operations Centre. In general terms, the [REDACTED] carries the following responsibilities:

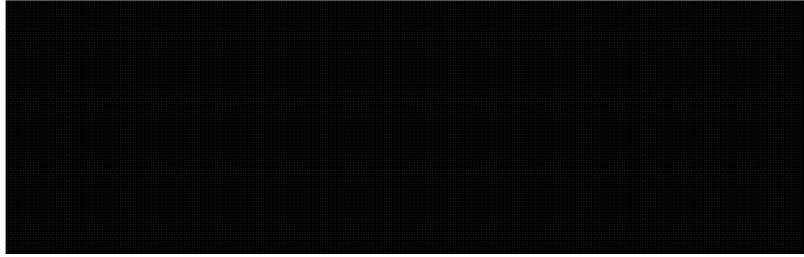
- Acts as CSEC's eyes, ears and point of contact (particularly during off hours);
- Monitors SIGINT and collateral reporting 24/7 for real or potential threats to Canadian and or allied interests;
- Provides timely support to Government of Canada (GC) departments and agencies, CF Commands, CSEC management or operational elements. [REDACTED]
- Liaises with Canadian and/or 2nd Party partners in response to crisis situations;
- Keeps abreast of issues of current or future interest to Canadian or allied interests (i.e. SIGINT posture, event planning);
- Supports various internal CSEC operational or service support areas during off-hours/weekends;
- Provides tailored support to Client Relations Officers (CROs) [REDACTED]
- Provides back-up to [REDACTED] during outages by taking over specific tasks or monitoring functions; and
- Authorises the sanitisation and release of SIGINT reports in a threat to life situation during off hours.¹⁵

¹⁵ Briefing to Commissioner's office. [REDACTED]

Office of Network Communication (ONC)

The ONC provides 24/7 technical, cryptological and SIGINT operational support to CSEC, its clients and partners. This section monitors the status of CSEC's various technical systems and determines the impact of systems failures and outages. Its areas of responsibility and duties include:

- Process and maintain various message delivery systems, such as:



5. [redacted] and

6. [redacted]



- [REDACTED]
- Provide off hours (24/7) technical support to CSEC clients on assorted SIGINT applications, systems and databases;
- Change/Incident Management Framework:
 - Generate/respond to [REDACTED] alerts and changes as outlined in the [REDACTED] and [REDACTED]
 - Coordinate with [REDACTED] subject matter experts to ensure service interruption is minimised.
- [REDACTED]
- Administer off-hours [REDACTED] support to CSEC clients [REDACTED] and [REDACTED]
- Provide off hours support [REDACTED] to GC clients, [REDACTED]

Events and Exercises (E&E)

Events and Exercises (E&E) provides advice and support in an operational and liaison capacity by organizing and coordinating CSEC-wide responses to surge events, [REDACTED] major events or exercises with national security implications. Such responses address CSEC requirements from Government departments and agencies, [REDACTED] in preparation for, or during situations of potential and/or real crisis, which could threaten Canadian life or property. [REDACTED]

The E&E Section is responsible for three main streams of activity [REDACTED] events; event coordination and management; and exercise design and play. The COPCC E&E team operates hand in hand with [REDACTED] ONC to provide 24/7 support to high priority operations. The E&E team leader reports directly to DIR COPCC, who may, or may not, be appointed as Event Manager, with specialist staff moving in and out of the COPCC as required.

²⁵ CSEC Briefing to the Commissioner's Office [REDACTED]

The concept of the term event is [REDACTED]

5. [REDACTED] Major Events

The E&E team [REDACTED] the CSEC representative for major events, acting as SIGINT authority and liaison. This team will normally function within a multi-GC department/agency security and intelligence environment (usually as part of a Joint Intelligence Group (JIG)). As part of this, the team will act as the co-ordination point [REDACTED]

6. Event Coordination and Management

Within the COPCC, the E&E Section plays lead role in supporting CSEC operations for surge operations and Major Events. This centralised operations structure brings together critical staff from different sections, including [REDACTED] to concentrate on top priorities. In this manner, personnel from any number of CSEC sections will move in and out of a given operation as required. COPCC is the lead coordinating body at the start of a surge event. Centralized coordination efforts within COPCC Floor Operations will then transfer to an operational focus, shifting to a "new" normalization of operations integrated into standard daily operations. Functions of the E&E team will involve calling initial meetings across SIGINT or CSEC as required, making sure everyone understands roles and responsibilities, monitoring progress, holding update meetings, liaising with Five-Eyes or Government of Canada partners as required, preparing situation reports (sitreps), and ultimately preparing Lessons Noted Action Plans (LNAPs) and following-up on lessons learned. CSEC advises that COPCC E&E is still in the burgeoning stages of developing this role and shaping it. Such a role involves the flexibility of adapting to each new situation, as no two events [REDACTED] will ever be alike.

7. GC [REDACTED] Exercises

The E&E team is the CSEC lead for inter-governmental [REDACTED] exercises with a national security nexus. This section's responsibilities run the gamut in Exercise including exercise planning, design and actual game play. As well, this section is responsible for post-exercise Lessons Noted Action Plans (LNAPs) to identify successes, shortcomings and areas for improvement.

Examples of exercises held [REDACTED]

²⁸ *Ibid.*

8. Personnel

The COPCC is currently designed for 36 full time Person Years (PYs). The COPCC works on a 2 x 12 hour shift system bolstered by daytime staff covering eight hours during the normal working day. This system operates on a five-week rotation.²⁶

According to CSEC, there are no unique qualifications required to work in the COPCC, per se. COPCC shift worker positions could be considered "entry level" within the directorate and could be staffed using an external process. In practice, most positions are filled by former military (usually drawing from the Communication Research occupation) and from internal competitions within CSEC itself.

There is an orientation period that will range from 1 to 3 months before individuals are actually placed on shift by themselves. This on-the-job training program is conducted with mentoring by an experienced member of the COPCC.²⁷

E&E positions require more organizational knowledge and industry specialisation and are therefore usually staffed following internal mechanisms. Members of the E&E team require detailed knowledge of SIGINT policy. This being the case, the E&E team has a more stringent selection process. To date, E&E team members have been either hand-picked for the assignment, or participated in a comprehensive internal competition to be deployed or assigned to the E&E team for an event or exercise.

9. Supporting Policy

The COPCC is situated within SIGINT and is subject to all existing CSEC operational policies such as the policy suite regarding the privacy of Canadians (the OPS-1 series),
IRRELEVANT and the Security/Control of
SIGINT (OPS-5 series).²⁸

For the time period under review, there was no specific policy or procedural document, such as a Canadian SIGINT Operations Instruction ("CSOI"), in place applicable to the COPCC. A CSOI is currently being developed (CSOI-2-1 *CSEC Operational Production and Coordination Centre (COPCC) Authorities*) and is in draft form only.²⁹ CSEC indicated that, barring other operational priorities, the draft CSOI is scheduled for completion during the [REDACTED] fiscal year.³⁰

²⁶ Interviews with COPCC Manager [REDACTED] and [REDACTED]

²⁷ Interview with Director COPCC and COPCC Manager [REDACTED]

²⁸ E-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

²⁹ E-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

³⁰ Interview with Director COPCC, [REDACTED] See also e-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

10. Physical footprint

The COPCC is made up of two distinct physical spaces. The first is located on the second floor of the Sir Leonard Tilley Building. This is the space that was occupied by the former CANSOC and it is the 24/7 watch centre staffed by personnel from [REDACTED] and ONC.

The second space is on the fourth floor of the Sir Leonard Tilley Building. This is best described as a command post location that normally sits unoccupied unless there is an exercise, [REDACTED] event, or a crisis of sufficient proportion to call for the mobilisation of the command post. It is configured with a line of command/watch officer workstations at its head with three rows of desks branching off with workstations for all key sections within CSEC. The number of people mobilised and the work stations occupied will depend on the nature and extent of the event/crisis. The space on the fourth floor is better viewed as flex space that can be used for the co-ordination of an actual event and as "space available" for other initiatives.³¹

11. Satellite locations

There is no satellite or alternate facility for the COPCC, per se. In the event of a catastrophic failure at the Confederation Heights location, a plan exists to shift operations and selected personnel [REDACTED] However, the systems focal point for the COPCC is at Confederation Heights [REDACTED]

12.

The COPCC [REDACTED]

13. Relationship with other GC agencies and operations centres

The COPCC has nothing formal in terms of arrangements in its interactions with other GC operations centres. Interactions that do take place are normally case-specific and are based on customer needs. The ONC Section regularly attends multi-departmental meetings to deal with Emergency Management. Likewise, the E&E Section will liaise with other GC operations centres as required depending on the nature of the exercise,

³¹ Interviews with Director COPCC, [REDACTED] and [REDACTED]

³² Interview with Director COPCC, [REDACTED]

³³ *Ibid.*

event or crisis.³⁴ While there are no formal arrangements, COPCC is a member of the Federal Operations Centre Working Group and is represented by [REDACTED] (occasionally ONC and/or E&E, as warranted). As well, the E&E team represents CSEC at the Interdepartmental Exercise Coordinating Community (IECC) to keep CSEC management informed of exercise developments and plans that will have an impact on emergency management decisions taken at ADM EMC (Emergency Management Committee) and national security decisions taken at ADM NS OPS (National Security Operations).

B. E&E SECTION AND THE SELECTED MAJOR EVENTS

Specific to this review was an examination of the role of the E&E Section in CSEC's support to the GC [REDACTED]
[REDACTED]

The COPCC led the pan-CSEC effort to co-ordinate the corporate response to both the [REDACTED] and [REDACTED]. The CSEC participation in the events included teams [REDACTED] operating from the COPCC [REDACTED]. Training and multi-departmental exercises took place to test and refine procedures. Lessons learned were documented and are being utilised to develop planning for the future.

1. Personnel

For both [REDACTED] and [REDACTED] a total of [REDACTED] personnel were assigned to the E&E Section [REDACTED] teams. The teams often worked [REDACTED] on extended hours (ranging from eight to twelve hour workdays and on-call during off hours and on weekends) over lengthy periods of time. The COPCC [REDACTED] Office [REDACTED] personnel) provided 24/7 support.

2. Training

A common approach to training was adopted for both events [REDACTED] and this continues to be utilised today. It was based on a roadmap (the Surge [REDACTED] Training Plan) developed by the [REDACTED] in collaboration with the COPCC E&E team.³⁵ Subjects included in the training that have either a direct or indirect nexus to compliance and privacy include CRO Function, SIGINT Legal Framework, ITS Familiarisation, Use and Dissemination of SIGINT, External Review - Disclosure Risk Management, and Document and Equipment Handling.

Team members completed all training requirements as outlined in the referenced document (specifically the checklist courses/training) [REDACTED]. This was accomplished either during the team's preparation [REDACTED] or in some cases, career experience/training from other positions held within CSEC.

³⁴ *Ibid.*

³⁵ CERRID #526508-VIC, Surge [REDACTED] Training Plan, [REDACTED]

Training for the team was provided via the following methods/techniques:

- a) formal instruction;
- b) one-on-one instruction/mentoring;
- c) train-the-trainer, (a team member received the instruction/direction and passed it on to the rest of the team); and
- d) On-the-Job-Training during the first few days [REDACTED]

3. Exercises

Exercises to confirm readiness were developed and conducted for both [REDACTED] and [REDACTED] events. These included:

[REDACTED]

A black and white photograph of a dark, textured surface, possibly a book cover or endpaper. Several horizontal white rectangular strips of varying lengths and positions are scattered across the page. Some strips are overlapping, creating a minimalist, abstract composition. The strips are located at various heights and widths, with some appearing as thin lines and others as more substantial blocks. The overall effect is one of sparse, geometric elements against a dark, grainy background.

³⁸ Interview with E&E Manager, [REDACTED]
³⁹ CERRID #585726 v14, LNAP [REDACTED] page 3.

Future [REDACTED] Operations

CSEC advises that, in the future, COPCC E&E will likely develop tailored event management contingency operations (CONOPs) to govern its participation in [REDACTED] operations as required, on a case-by-case basis. One possible example cited was [REDACTED]. If CSEC is invited to participate as a member of an RCMP-led JIG, then a CONOP would be developed to guide and direct that participation.⁴¹

4. Policies

The applicable OPS policies that governed the E&E team [REDACTED] in support of JIG clients were:

Privacy of Canadians

- OPS-1, *Protecting the Privacy of Canadians and Ensuring Legal Compliance in the Conduct of CSEC Activities* (December 23, 2009 and March 11, 2010);
- OPS-1-1, *Procedures for Release of Suppressed Information from SIGINT Reports* (May 8, 2008);
- OPS 1-6, *Operational Procedures for Naming and Releasing Identities in Cyber Defence Reports* (March 11, 2010);
- OPS-1-7, *SIGINT Naming Procedures* (September 29, 2004);
- OPS-1-8, *Active Monitoring of Operations to Ensure Legal Compliance and the Protection of the Privacy of Canadians* (December 23, 2008) ;
- OPS-1-10, *Operational Procedures for Metadata Analysis* [REDACTED] (September 26, 2008).

Support to CSIS and Law Enforcement Agencies

- [REDACTED]

Security/Control of SIGINT

- OPS-5, *Canadian SIGINT Security Standards (C5SS)* (March 1, 1995);
- OPS-5-1, *Operational Use of the Internet* (January 27, 2005);
- OPS-5-2, *CSE SIGINT Reporting Procedures* (superseded by a CSE SIGINT Operations Instruction CSOI-4-1 *SIGINT Reporting*);

⁴¹ E-mail from Policy and Review Advisor, External Review and Policy Management [REDACTED]

- OPS-5-3, *Write-To-Release (WTR) Procedures* (October 18, 2002);
- OPS-5-6, *Providing access to SIGINT information* (March 29, 2004);
- OPS-5-8, *GAMMA Handling Standards* (July 11, 2007);
- OPS-5-9, *End Product Sanitization/Action-on Procedures* (May 10, 2002);
- OPS-5-14, Superseded by a *CSSD 103 The SIGINT Classification System*;
- OPS-5-15, *Need-to-Know Guidelines* (April 13, 2004);
- CSSD-2101, *Dissemination of SIGINT*⁴²

██████████

According to CSEC, the standard identity disclosure procedure used with the RCMP's Sensitive Information Handling Unit (SIHU) worked well ██████████ and is being formally defined in a Memorandum of Understanding between RCMP and CSEC.⁴³ CSEC advises that both it and the RCMP are continuing the drafting of the Memorandum of Understanding regarding SIGINT handling and anticipate that the MOU could be concluded during FY ██████████⁴⁴

The need for time-sensitive policy authorisations for the release of suppressed identity information in SIGINT reports ██████████ prompted the Chief to approve a specific and unique instrument developed for the E&E team, "Procedures for Identity Management, Actions-on and Sanitizations during ██████████"⁴⁵ This instrument was signed into authority on ██████████ and was valid for ██████████. It provided delegated authority by name to two members of the ██████████ E&E team for "identity management, sanitization and action-on decisions within established procedures". Specific direction was given as to when, how, and in what circumstances (i.e. threat-to-life; non-threat-to-life), this delegation was to be exercised and who ██████████ must be informed whenever the delegation was exercised. Additionally, in the case of non-threat-to-life circumstances, if approvals had not been obtained from ██████████ as required, the E&E Team were authorized to take action based on a single approval from either the DGPC or Director COP.

⁴² E-mail from Policy and Review Advisor, External Review and Policy Management, ██████████

⁴³ Excerpt from the CSEC Chief's Annual Report to the Minister of National Defence, ██████████ pages 7-8.

In an e-mail from Policy and Review Advisor, External Review and Policy Management, ██████████ CSEC advised that the drafting of this MOU is ongoing and its completion is anticipated for Fiscal Year ██████████

⁴⁴ E-mail from Policy and Review Advisor, External Review and Policy Management, ██████████

⁴⁵ E-mail from Policy and Review Advisor, External Review and Policy Management, ██████████

The instrument was only used once during the course of [REDACTED] when a disclosure was made to the CSIS Liaison Officer after normal working hours.⁴⁶

[REDACTED]

For [REDACTED] with the Chief's approval, a similar authority was developed and approved.⁴⁷ The essence of the authority provided the following:

- Two managers within the [REDACTED] Group were authorized to release Canadian identities to CROs and the COPCC simultaneously with report releases. During core hours, efforts were to be made to obtain DGPC approval for contextual identification approvals of all CSEC reports. However, if approval could not be obtained within 30 minutes, the managers were authorized to approve all contextual authorizations and inform the DGPC after the fact that they had done so. DGPC reserved the right to cancel any report if [REDACTED] disagreed with the approval given by the managers.
- The [REDACTED] COPCC Events Team was given authority to approve sanitization/action-on requests for threat-to-life situations where there was no time to contact [REDACTED]. The COPCC Events team had to notify the Manager, Operations Policy as soon as possible after the fact and provide the information normally required for sanitisation/action-on requests. The Manager Operations Policy would, in turn, then review and handle the requests in accordance with existing policy after the fact.

CSEC advises that consideration will be given to using a similar instrument in the future for [REDACTED] events on a case-by-case basis. The decision to do so would lay with the Chief CSEC for approval and would be guided by a variety of factors including SIGINT support requirements, [REDACTED] disclosure risk management, threat levels and team-member experience.⁴⁸

IT Security Policies

While the focus of this review was largely on the SIGINT activities, CSEC advised that there were several IT Security concept of operations documents that applied to both the [REDACTED] and [REDACTED] which guided the E&E team in addition to those already cited.⁴⁹ These included:

⁴⁶ Interview with E&E Manager, [REDACTED]. See also e-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]. The disclosure request forms that relate to this issue are CERRID #468544 and CERRID #458298.

⁴⁷ CERRID #567626 V1 Release of Canadian Identities and Approval of Sanitizations/Actions-On [REDACTED]

⁴⁸ E-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

⁴⁹ E-mail from Policy and Review Advisor, External Review and Policy Management, [REDACTED]

- ITS CONOP - Concept of Operations: IT Security Operational Response to [REDACTED]
- ITS COMSEC Support [REDACTED]
- ITS [REDACTED]⁵² and
- ITS [REDACTED]⁵³

ONC

For the period under review, the COPCC made extensive use of an internal website. The Commissioner's office was advised that this business practice continues today.

For the purpose of this review, and due to the great number of documents (recalling [REDACTED] role to support various internal CSEC operational or service support areas during off-hours/weekends and ONC's role to provide 24/7 technical, cryptological and SIGINT operational support), CSEC provided two web-links for the [REDACTED]/ONC that contain CSEC's working aids/SOP's etc.⁵⁴ The internal web links are:

- a) [REDACTED] and
- b) [REDACTED]

⁵⁰ CERRID #173802, IT Security [REDACTED] CONOP [REDACTED] Note: Section 4 (IT Security Support Costs) and Annex B (Standby Costs) of this document outline support costs and provide a detailed breakdown of standby costs as per the collective agreement. These sections have been removed from the document as they are not relevant to the terms of reference for this review.

⁵¹ CERRID #429692 V1A COMSEC Support [REDACTED]

⁵² CERRID #431563 V1 [REDACTED]

⁵³ CERRID #431547 V1 [REDACTED]

⁵⁴ E-mail from Policy and Review Advisor, External Review and Policy Management [REDACTED] Note: These are "evergreen" sites that are being continually updated to reflect current needs/operations. CSEC cautioned that it cannot confirm that the content present reflects what was in place during the review period as indicated in the Terms of Reference. CSEC therefore draws the readers' attention to modification dates on the documents posted on the website.

5. The Operation(s)

Team Roles

For both [REDACTED] and [REDACTED], the [REDACTED] team roles included:

- Gathering requirements/foreign leads;
- Delivering appropriate end product reporting, relaying feedback, refining requirements;
- Advising clients on interpretation, use and handling of information;
- Educating clients on capabilities and authorities;
- Adhering to the SIHU governance model for disclosure and information sharing in the JIG;
- Providing time-sensitive support to the JIG Commander [REDACTED] in the event of an urgency;
- Urgent SIGINT to the [REDACTED] as required (RCMP, [REDACTED] CF Canada Command); and
- Courtesy provision of SIGINT to CFLOs, SOFCOM, CSIS LOs⁵⁵

During both [REDACTED] the teams [REDACTED]

Priorities (used as training themes and as actual priorities during [REDACTED])

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

⁵⁵ CERRID #547894 v1B, COPCC [REDACTED] Briefing to SIGINT Board, [REDACTED] and CERRID #551574 v1 COPCC [REDACTED] Briefing to RCMP JIG Federal Partners [REDACTED]

⁵⁶ Interview E&E Co-ordinator, [REDACTED]

⁵⁷ CERRID #547894 v1B, COPCC [REDACTED] Briefing to SIGINT Board, [REDACTED]

IRRELEVANT

IRRELEVANT

6. SIGINT Reporting and Disclosure of Suppressed Information about Canadians to GC Clients

[REDACTED]

During the course of [REDACTED] a total of [REDACTED] SIGINT end product reports were deemed pertinent to the operation and shared with JIG/SIHU clients. There were a total of [REDACTED] requests for release of suppressed Information about Canadians, which in turn resulted in the disclosure of a total of [REDACTED] individual pieces of Canadian identity information.

Identity releases were, with one exception, accomplished through the standard identity disclosure procedure. In the one exception, Canadian identity information was disclosed pursuant to the unique policy instrument established by the CSEC Chief [REDACTED] [REDACTED] (see Supporting Policy Section above).⁵⁹

[REDACTED]

During the [REDACTED] period, the CSEC team shared [REDACTED] SIGINT end product reports with JIG/SIHU clients. These generated a total of [REDACTED] requests for release of suppressed Information about Canadians, which resulted in the disclosure of [REDACTED] individual pieces of Canadian identity information.

Upon the request of the Canadian Security Intelligence Service, one end product report originally designated Canadian Eyes Only was converted to "Rel to US" and released to [REDACTED] the US.⁶⁰ The wording contained in the body of the report was not altered in any way. The Commissioner's office examined the circumstances leading to the release of the Canadian Eyes Only report and had no questions.⁶¹

⁵⁸ CERRID #774656 v1 COPCC Capture Document [REDACTED] page 3. Note: While reference is made to [REDACTED] within COPCC documents, this operation was not examined and is outside the review's specific focus on the COPCC, although it was a part of the overall [REDACTED] operation.

⁵⁹ Interview with E&E Manager, [REDACTED]

⁶⁰ E-mail from Policy and Review Advisor, External Review and Policy Management [REDACTED]

⁶¹ CERRID #846966-v1, Request for downgrade of classification, [REDACTED]

VIII. FINDINGS

As an organization, the COPCC and its sub-components provide CSEC with around-the-clock technical, messaging, cryptographic and operational support, and real-time threat awareness. It also provides crisis-related information to different elements at CSEC, GC departments and agencies, Canadian Forces Commands [REDACTED]

[REDACTED] The COPCC enhances and streamlines CSEC's activities in support of broader GC direction and objectives. As such, it is subject to the same laws, ministerial direction, and established policies and procedures as the rest of the organization.

A major objective of this review was to examine and acquire a detailed knowledge and understanding of the role, organization, makeup and activities of the COPCC in general and the E&E Section in particular. As a result, a significant part of this report is dedicated to explaining and documenting the information acquired, like a study.

A) LEGAL REQUIREMENTS

Finding no. 1: Compliance with the Law

Based upon the information reviewed and the interviews conducted, CSEC conducted its support to major events through the COPCC in accordance with the law.

CSEC advised that there are no foundational legal opinions applicable to this review. This is not surprising because the activities reviewed, although conducted [REDACTED] [REDACTED] are not different than those conducted regularly as part of CSEC's mandate. The Commissioner's office did not identify any other activities that would suggest a requirement for specific consultation with counsel. Additionally, CSEC's Directorate of Audit, Evaluation and Ethics (DAEE) advised that there are no relevant audit or evaluation reports in relation to the review.

Two major events and certain associated activities of the E&E section were chosen for examination for compliance with the law, ministerial direction, and policies and procedures. These activities were not unique in their nature beyond the fact that [REDACTED] [REDACTED] Since the E&E Section's [REDACTED] team were operating in a multi-departmental / agency environment [REDACTED] and under potentially heightened levels of pressure, the Commissioner wished to examine the related activities to ensure that established policies and procedures related to compliance and privacy were not compromised in these unique [REDACTED] situations.

In general, and for the activities examined, the Commissioner's office found that E&E managers and other employees involved in the major events were aware of and complied with legal requirements.

For the period under review, the activities conducted by the E&E Section in its support to the two major events did not appear to present any greater risk to the privacy of Canadians than activities conducted by other sections of CSEC. The activities reviewed for this report involved only a minimal number of private communications and information about Canadians.

The *NDA* requires that CSEC provide foreign intelligence in accordance with Government of Canada intelligence priorities (paragraph 273.64(1)(a)). COPCC activities in support of [REDACTED] and [REDACTED] resulted in the production of [REDACTED] reports shared with numerous clients on various foreign intelligence subjects such as [REDACTED]

The Commissioner's office examined all of the reports and had no questions.

To ensure compliance with the law and appropriate measures to protect the privacy of Canadians, the Commissioner's office also examined in detail CSEC's processing of all requests for and associated releases of Canadian Identity Information suppressed in CSEC's foreign intelligence reports, produced in support of both the major events under review. The Commissioner's office has no questions about any of the requests or associated disclosures. The justifications given by the requesting departments and CSEC activities met established criteria that have been examined in detail in past reviews and assessed as appropriate and reasonable. The authorities and justifications put forward for the disclosures by the requesting agencies met the established criteria and were appropriate.

Finding no. 2: Privacy Incident

CSEC took appropriate corrective action in a timely manner in response to the privacy incident it recorded relating to the subject of review.

There is a relevant entry in CSEC's Privacy Incident File (PIF) for [REDACTED] concerning a list of selectors drawn up [REDACTED] for a metadata analysis project, [REDACTED] and a related entry [REDACTED]. We note that while the incident relates to CSEC work [REDACTED] it did not involve the COPCC or E&E Section. The incident involved the [REDACTED] contact chaining [REDACTED]. The purpose of this project was to compile [REDACTED]. This was a strategic project with the objective of identifying potential threats [REDACTED].

This entry was investigated in some depth and addressed in the Commissioner's [REDACTED] review of CSEC's PIF. The circumstances of this incident were examined in greater depth as part of this review and the Commissioner's office concludes that the incident was handled and resolved appropriately.

B) MINISTERIAL REQUIREMENTS

Finding no. 3: Ministerial Direction

Based upon the information reviewed and the interviews conducted, CSEC conducted its support to major events through the COPCC in accordance with ministerial direction.

COPCC and support to major events activities are not subject to any specific reporting or other requirements under ministerial authorizations or directives. This is not surprising because the activities reviewed, [REDACTED] are the same as those conducted regularly as part of CSEC's mandate. The Commissioner's office did not identify any other activities that would suggest a requirement for specific ministerial direction.

In general, and for the activities examined, the Commissioner's office found that E&E managers and other employees involved in the major events were aware of and complied with ministerial requirements.

C) POLICIES AND PROCEDURES

Finding no. 4: Appropriateness of Policies and Procedures

Operational policies and procedures for activities in support of major events are in place and provide sufficient direction to CSEC employees respecting the protection of the privacy of Canadians.

The COPCC as an organizational structure and CSEC activities conducted in support of major events are subject to the full range of CSEC's policies and procedures.

The COPCC has established and maintains a closed website that serves as a ready reference by providing a single location for personnel to access policy guidance, procedures, SOPs and other direction. Although not yet in place, work is ongoing to institute a CSOI specifically addressing the COPCC (see Finding no. 5 below). Additionally, a unique policy and procedure instrument was instituted [REDACTED] to meet specific challenges unique to that particular [REDACTED] event (see Finding no. 6 below).

Finding no. 5: Policies and Procedures for the COPCC

Operational instructions provide limited direction specific to the functioning of the COPCC.

For the time period under review, there was no specific policy or procedure document, such as a Canadian SIGINT Operations Instruction (CSOI), in place applicable to the COPCC. CSEC advised that a CSOI is currently being developed (CSOI-2-1 *CSEC Operational Production and Coordination Centre (COPCC) Authorities*). The Commissioner's office reviewed a draft table of contents of the CSOI. CSEC advises that the anticipated timeframe for the draft to be ready for senior management review is assessed to be within fiscal year [REDACTED]. The Commissioner encourages CSEC to promulgate the CSOI for the COPCC as soon as is practically possible.

Finding no. 6: Policies and Procedures for Major Events

The use of a temporary policy instrument during [REDACTED] and a similar instrument during the [REDACTED], to streamline approval processes for identity management, actions-on and sanitizations was appropriate.

For the [REDACTED], the Chief approved a specific and unique instrument for the E&E team, "Procedures for Identity Management, Actions-on and Sanitizations during the [REDACTED]". It provided delegated authority by name to two members of the CSEC [REDACTED] E&E team for "identity management, sanitization and action-on decisions within established procedures". The driving motivation to institute this temporary instrument was the [REDACTED]. In actual terms, the instrument was only utilized once during the course of the event.

Likewise, during [REDACTED] with the Chief's approval, a similar authority was developed and approved. Two managers within the [REDACTED] Group were authorized to release Canadian identities to CROs and the COPCC simultaneously with report releases. As well, the [REDACTED] COPCC Events Team was given authority to approve sanitization/action-on requests for threat-to-life situations [REDACTED]. The COPCC Events team had to notify the Manager, Operations Policy as soon as possible after the fact and provide the information normally required for sanitisation/action-on requests.

The Commissioner's office has no questions about the use of these temporary policy instruments in the circumstances reviewed. In general, the Commissioner's office accepts the need for temporary instruments of this type in order for [REDACTED] CSEC assets to provide the necessary support in a timely fashion, particularly when a risk to life may be involved.

Finding no. 7: Awareness of Personnel

CSEC managers and other employees interviewed were aware of relevant policies and procedures and their application to the COPCC and major events.

In general, and for the activities examined, the Commissioner's office found that the managers and other employees involved in the COPCC and major events were aware of and complied with policies and procedures.

Finding no. 8: Management Control Framework

CSEC managers routinely and closely monitored its support to major events through the COPCC to make certain the activities complied with governing authorities.

For the activities examined, CSEC maintained an appropriate document trail and close supervision of support activity was exercised [REDACTED] within the COPCC [REDACTED] [REDACTED] for the [REDACTED] events.

IX. CONCLUSION

Major events carry with them a number of obligations and implications for the GC [REDACTED]

[REDACTED] Likewise (depending on the nature of the event), [REDACTED]

[REDACTED] the GC may call upon CSEC for the provision of foreign intelligence.

This is the first review of the COPCC, which is the new Operational Coordination directorate, created within the Director General for SIGINT Programs. Since the COPCC may be operating in an environment of high pressure (or even crisis) during the conduct of a major event, the possibility of an error occurring, in either procedure or judgement, may be greater than during normal day-to-day operations. The potential impact on the privacy of Canadians or non-compliance with the law while conducting certain of these activities could be significant.

[REDACTED] two [REDACTED] events [REDACTED] and [REDACTED] both of which offer good examples of activities conducted in support of major events. It is for these reasons that the Commissioner selected the COPCC and activities conducted in support of major events for review.

The objectives of the review were for the Commissioner to acquire a detailed knowledge and understanding of the role, organization, makeup and activities of the COPCC in general and the E&E Section in particular; to acquire detailed knowledge of, and to document, CSEC's activities in support of major events generally; to assess whether the SIGINT activities conducted in support of two major events [REDACTED] complied with the law; to assess the extent to which the SIGINT activities conducted in support of two major events [REDACTED] were conducted in accordance with the requirements of applicable MAs and MDs; and finally to assess the extent to which CSEC protected the privacy of Canadians in carrying out the SIGINT activities in support of [REDACTED] and [REDACTED]

Based upon the information reviewed and the interviews conducted, CSEC conducted its support to major events through the COPCC in accordance with the law and ministerial direction.

CSEC took appropriate corrective action in a timely manner in response to a privacy incident it recorded relating to the subject of this review.

Appropriate operational policies and procedures were in place and provide sufficient direction to CSEC personnel respecting the privacy of Canadians. The use of temporary policy instruments during both the [REDACTED] and [REDACTED] to streamline approval processes for identity management, actions-on and sanitizations was appropriate.

However, operational instructions provide limited direction specific to the COPCC. It is a positive development that CSEC has recognized this gap and is developing an operational instruction respecting the activities of the COPCC. Both CSEC managers and their employees were aware of relevant policies and procedures and CSEC managers routinely and closely monitored the support to major events activities to ensure the activities complied with the governing authorities.

Finally, it is concluded that the activities conducted by the E&E Section in support of major events do not appear to present any greater risk to the privacy of Canadians than activities conducted by other sections of CSEC.

There are no recommendations specific to this review.

A list of findings and recommendations is enclosed at Annex A.



Robert Décary, Commissioner

ANNEX A – Findings

Finding no. 1: Compliance with the Law

Based upon the information reviewed and the interviews conducted, CSEC conducted its support to major events through the COPCC in accordance with the law.

Finding no. 2: Privacy Incident

CSEC took appropriate corrective action in a timely manner in response to the privacy incident it recorded relating to the subject of review.

Finding no. 3: Ministerial Direction

Based upon the information reviewed and the interviews conducted, CSEC conducted its support to major events through the COPCC in accordance with ministerial direction.

Finding no. 4: Appropriateness of Policies and Procedures

Operational policies and procedures for activities in support of major events are in place and provide sufficient direction to CSEC employees respecting the protection of the privacy of Canadians.

Finding no. 5: Policies and Procedures for the COPCC

Operational instructions provide limited direction specific to the functioning of the COPCC.

Finding no. 6: Policies and Procedures for Major Events

The use of temporary policy instruments [REDACTED] to streamline approval processes for identity management, actions-on and sanitizations was appropriate.

Finding no. 7: Awareness of Personnel

CSEC managers and other employees interviewed were aware of relevant policies and procedures and their application to the COPCC and major events.

Finding no. 8: Management Control Framework

CSEC managers routinely and closely monitored its support to major events through the COPCC to make certain the activities complied with governing authorities.

ANNEX B – Interviewees

Director, CSEC Operational and Production Coordination Centre
Manager, CSEC Operational and Production Coordination Centre
Manager, COPCC Events and Exercise Section
Analyst, COPCC Events and Exercise Section