PROCESS FOR SIGINT METADATA MINIMIZATION

Effective: January 29, 2015 (Revised Version – Originally Issued September 25, 2014)

INTRODUCTION

(C) SIGINT Programs Instructions (SPIs) are working aids intended to address gaps and grey areas that are only partially addressed by, or scattered over several, existing policy instruments. They represent a consolidated and/or expansion of information contained within other policy instruments (e.g., CSOIs, OPS documents, etc.)

(S//SI) SPI-7-14 outlines the process for documenting and tracking updates to the CSE minimization process required before sharing ███████ metadata ████████████. Minimization is required in accordance with:

- OPS-1, *Protecting the Privacy of Canadians & Ensuring Legal Compliance in the Conduct of CSE Activities*; and
- The Ministerial Directive on the Collection and Use of Metadata.

(U) CSE must always act lawfully in delivering its mission. Protecting the privacy of Canadians is a fundamental tenant of our mission. CSE must apply reasonable measures to safeguard the privacy of Canadians while striving for the most effective collection operations to produce foreign intelligence of value to GC clients.

CONTEXT

(TS//SI) In accordance with the Ministerial Directive on the Collection and Use of Metadata, CSE must take measures to render unidentifiable Canadian Identifying Information (CII) prior to sharing ███████████ metadata ███████████████.

CSE began minimizing Dialled Number Recognition (DNR) metadata records for 2nd Party sharing in 2005. Since then, collection equipment was upgraded, ██████████████████████████████████████ ███████████████████ which resulted in metadata field changes. CSE has also agreed to share Digital Network Intelligence (DNI) metadata with its 2nd Party partners, ████████████████████████ ████████████████████████ These ongoing changes require that the minimization process be updated regularly to ensure CSE continues to meets its legal obligations to protect the privacy of Canadians. This document outlines roles and responsibilities for minimization, as well as the process to ensure that ███████ ████████████ metadata sharing is compliant.[1]

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[1] Note that this instruction does not apply to the selected sharing of metadata through targeting or validated queries.
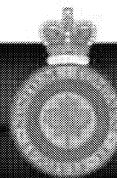
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COLLECTION DOCUMENTATION

(TS//SI) When it comes to DNR, ████████████████████████████
DNR metadata, ██

(S//SI) Each DNR metadata format ████████████████ must be documented by subject matter experts in DG Access. The documentation will indicate:
* the nature of each metadata field ████████████████████
* examples of values (e.g. 1-613-999-xxxx); and
* which fields contain identifying information requiring minimization, in consultation with SIGINT Programs Oversight and Compliance (SPOC) when necessary.

(S//SI) The resulting metadata format documentation will be saved to corporate information management systems (CERRID) and will be made available to all stakeholders. This documentation will inform the development of minimization capability.

(S//SI) In the case of ████ DNI metadata sharing, each field must be reviewed to ensure that no identity information is shared without minimization. SIGINT operational areas sharing DNI metadata must document which fields they are sharing and which are subject to minimization.

REQUIRED ACTIONS WHEN CHANGES ARE MADE TO COLLECTION EQUIPMENT THAT MAY AFFECT MINIMIZATION

(TS//SI) Guidelines for documenting metadata minimization updates are listed below. Procedures established by DGP/SPOC will be used to notify stakeholders, and begin with submission of the Metadata Minimization Change Notification web form. The web form will capture details of the change for tracking and compliance purposes, to include:
* ████████ affected by the changes;
* Metadata ████████████████████
* Date of Change;
* Updated Documentation, CERRID reference number;
* Description of change; and
* List of stakeholders e.g. ████████████ SPOC, others as required.

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ROLES AND RESPONSIBILITIES FOR DNR MINIMIZATION

SPOC	• Advises on what constitutes identifying information in collected or generated metadata fields as required; • Develops, coordinates and documents a minimization compliance validation activity, to ensure the update process is followed, changes have been made, and if not, detect any anomalies that may be present in shared metadata. • The Compliance Validation team will pull a sample of from all data collection formats every 30 days and manually review it to ensure the minimization process is accurate and working according to the format documentation. • Reports on any anomalies/incidents found in the metadata; if a privacy breach is discovered (i.e. ▮▮▮▮▮data has been shared without proper minimization), reports to D2 Corporate and Operational Policy for inclusion in the Privacy Incident File, for OCSEC review.
Associated SIGINT Collection Area(s)	• Completes the online web form Metadata Minimization Change Notification web form and provides a description of change. • Notifies all stakeholders of any impending change and updates associated documentation for inclusion into CERRID.
▮▮▮▮▮▮▮	• Forwards minimized ▮metadata ▮▮▮▮▮▮through approved channels • Upon notification of a **DNR collection equipment** change, halts all affected dataflows, pending confirmation from the ▮that the minimization process has been updated and testing was successfully completed.
▮▮▮(DNR)	• Updates the automated DNR minimization capability in accordance with updated documentation from associated SIGINT Collection Area(s) and SPOC. • Ensures ▮▮▮are in place in the event the process malfunctions. • Provides confirmation to stakeholders identified in the web form when updates are complete. • Provides a sample of minimized records for review by the SPOC compliance validation team.
SIGINT operational areas sharing **DNI metadata**	• Obtains approval from Director SPR to share ▮▮▮▮DNI metadata. • Review each DNI metadata field to ensure that no un-minimized identity information is shared. • Consult with SPOC as required.

ROLES AND RESPONSIBILITIES FOR DNI MINIMIZATION

SPOC	• Advises on what constitutes identifying information in collected or generated metadata fields as required; • Develops, coordinates and documents a minimization compliance validation activity, to ensure the update process is followed, changes have been made, and if not, detect any anomalies that may be present in shared metadata.

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	• Reports on any anomalies/incidents found in the metadata; if a privacy breach is discovered (i.e. ████████ data has been shared without proper minimization), reports to D2 Corporate and Operational Policy for inclusion in the Privacy Incident File, for OCSEC review.
Associated SIGINT Collection Area(s)	• If collection equipment has been changed, completes the online web form Metadata Minimization Change Notification web form and provides a description of change. • Notifies all stakeholders of any impending change and updates associated documentation for inclusion into CERRID.
████████	• Forwards minimized ██ metadata ████████████ through approved channels
███ (DNI)	• Ensures that ████████ DNI metadata ██████████████████ is minimized prior to sharing with 2nd Parties. • Provides a sample of minimized records for review by the SPOC compliance validation team as requested.
SIGINT operational areas sharing **DNI metadata**	• Obtains approval from Director SPR to share ████████ DNI metadata. • Ensure ████████ DNI metadata is minimized prior to sharing. • Consult with SPOC as required.

MINIMIZATION INCIDENTS

(TS//SI) If any of the stakeholders, or a partner, or an analyst using the data discovers un-minimized Canadian identifying information ████████████████████████████████ the following steps will be taken:
- Notify SPOC, by specifying the observed data, the ████████ involved, and the date of discovery;
- SPOC will gather information and request that ███ halt the flow if an incident is confirmed;
- ████ will halt all affected metadata flows immediately;
- SPOC will contact stakeholders in DG Access and DG Core to look into the cause of the incident, and will develop a mitigation plan; and
- Appropriate stakeholders will apply the mitigation, and the flow will be re-established upon completion.

PROMULGATION

(S//SI) I hereby approve SPI-7-14, *Process for SIGINT Metadata Minimization*. This SIGINT Programs Instruction is effective immediately.

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James Abbott
Director General, SIGINT Programs