

Feedback on the Direction for a New Government of Canada Digital Policy

By: The Information and Communications Technology Council

116 Lisgar Street, Suite 300

Ottawa, Ontario

info@ictc-ctic.ca

613-237-8551



Thank you for the opportunity to provide feedback to the proposed Government of Canada Digital Policy. The Information and Communications Technology Council (ICTC) welcomes the opportunity to provide input to this important initiative. It is also important the policy is planned to be an iterative, living policy framework as a static policy is an anathema to all digital initiatives.

Government digital initiatives should be conducted in collaboration with private sector leaders to ensure that the expertise in these companies is utilized and that government does not unnecessarily encroach on/replacate capabilities existing in the private sector.

Feedback on the Digital Policy Proposal:

How would you see these proposals improve your life in using Government of Canada services?

In the age of data-as-an-economy, eCommerce, A.I, IoT, and smart cities, the government should focus its strategy on being “Digital First”. Such a policy measure will have the beneficial effect of enabling citizens to be more digital savvy and entice companies that transact with government to further adopt technologies and heighten their digital advantage in a global economy.

The Canadian government needs to articulate a clear digital services strategy that will enable faster and efficient services by 2023 (for instance) in: e-Identity, e-Health, e-Voting, etc. Such a strategy will provide Canadians and businesses (national & international) with the clarity and confidence that the government of Canada is paving the way for a competitive and advanced economy and society.

The concept of a “tell-us-once” approach is core to providing Canadians and improved Government of Canada experience. The “Sign-In Partner” capability is a move in the right direction but more can be accomplished with better information sharing between departments. This would reduce the frustration users experience when interacting with new services and having to provide information the government already has. It would also eliminate the government from having different address/name/general information about the same person in different departmental systems.

The reduction of paper-based information and forms will lead to better service delivery, measurement, evaluation and improvement. It will also reduce the manual effort required to process user interactions.

If Canadians begin to see that their feedback about the user experience is incorporated, in a timely matter, into the digital services they use, then trust in the process and the underlying digital services will improve.

How would you see these proposals contributing to meaningful improvement in government operations and the delivery of government services?

A “tell-us-once” approach can facilitate a number of service improvements:

- Reduce the data management burden placed on users.
- Enable the government’s finite and stretched cybersecurity resources to better work on hardening and protecting individual’s private information.
- Accelerate the design, development and rollout of new digital service offerings.

A smoother user experience can lead to higher form completion rates which can lead to fewer calls to help phone lines and abandoned user interactions.

The modernization of information management practices can set in place a data/information foundation for all digital services. Standards are the plumbing that will enable digital services to be integrated and synchronized.

Improved digital services around immigration enquiries, supported by sufficient privacy and security considerations, will be able to significantly reduce the number of Access to Information (ATI) re-

quests people submit to circumvent inadequate digital capabilities encountered in the current immigration process. This will result in better service provision for both immigration enquiries and ATI requests.

Advancing Open Government practices throughout the Government of Canada will help Canadians better understand the digital services provided and can boost the trustworthiness of the digital ecosystem. As Canada will be hosting the 2019 global Open Government Partnership Summit in Ottawa, it will be an opportunity for Canada to share its progress on digital policy initiatives.

If these proposals were adopted, what are the key considerations and challenges for implementation?

There are current rules and policies that prevent/hamper government departments to share people's information to make the tell-us-once approach an achievable target. Another challenge is that current government processes are very transaction-centric. Financial institutions pioneered the framing of the user experience away from pure transactions and toward life events. The Government of Canada is encouraged to explore how life event-based user experiences could be employed in their context.

The focus on user-centricity and how it is interpreted will be an important determining factor for the success of the digital policy. There are a number of factors in the Canadian context that can both exacerbate the digital divide and limit services to inadequately connected people in Canada:

- The vast geographic expanse and the related challenges to providing high speed connectivity to rural/remote regions
- The relatively high cost of wireless services
- The lack of a national digital/data literacy strategy

When considering the proposal to "recognize information/data as a strategic asset", the focus on "government-wide" standards may miss opportunities to leverage international data standards (e.g. the Open Contracting Data Standard) to set a foundation for international digital trade and cooperation. As a signatory of the International Open Data Charter, Canada should look to the Charter's principles to help guide the formulation of this policy.

To attract and retain young digital professionals to help modernize and shift existing public servant norms will require investment in best of class tools and safe places to innovate and experiment.

Cyber Security

Possibly the one of the most important considerations and challenges that must be addressed for implementation is the protection of data. Cyber threats to national and economic security increase each year in frequency, scope and severity of impact. Cyber criminals, hackers and foreign adversaries are becoming more sophisticated and capable every day in their ability to use the Internet for nefarious purposes (NSA/CSS, 2016).

Given the rise in vulnerabilities in a highly connected era, measures to protect data are a critical necessity. With multiple important consultations and discussions on protecting citizen data, we wish to point out that there is a link between inter-government policy and the outside world given the intermingling of private sector and government data collection. These vulnerabilities include energy, transportation, power, financial, manufacturing and other sectors. As the "Internet of Things" further proliferates more data will be exponentially stored and transmitted by governments, making for highly attractive targets.

Mitigation of cyber crime and state-sponsored intrusions are therefore a highly important piece of any government data strategy. The Canadians Security Establishment's new Cyber Center and its collaborative model will be an important stakeholder in addressing these challenges. The new government data policy must be proactive in mitigating sophisticated computer and network intrusions, identify theft and ransomware.

In June 2015, for example, the U.S. Office of Personnel Management (OPM) announced that it had been

the target of a data breach targeting the records of as many as four million people. The final estimate of stolen records is approximately 21.5 million. This includes the records of people who had undergone background checks, but who were not necessarily current or former government employees. Information targeted in the breach included personally identifiable information such as Social Security numbers, names, dates and places of birth, and addresses.

The federal government may wish to look at organization's such as the the Electricity Information Sharing and Analysis Center (E-ISAC) which gathers and analyzes security data, shares appropriate data with stakeholders, coordinates incident management, and communicates mitigation strategies with stakeholders. The E-ISAC, in collaboration with the U.S. Department of Energy (DOE) and the [Electricity Subsector Coordinating Council \(ESCC\)](#), serves as the primary security communications channel for the electric industry and enhances industry's ability to prepare for and respond to cyber and physical threats, vulnerabilities, and incidents. Given the variance in requirements by sector, individual hubs such as E-ISAC may assist utilizing collaboration to protect against vulnerabilities brought forward by the immense data collection that lies ahead from those with ill-intent.

Noting that the rules would continue to be developed and evolve over time, are there immediate, critical gaps with these current proposals?

Two of the key findings of the consultation "Digital should be an enabler and not the driver, ... Going digital should not leave citizens and public servants behind..." are dated precepts that need to be placed into a more progressive frame. Digital is far more than an enabler and the pace of digital uptake needs to be accelerated not moderated. One of the major tenets of the open government movement is that society and technology are moving so quickly that government can not keep up on its own and needs to open up to citizens and the private sector to fill gaps. The GC Talent Cloud is a pilot initiative that encapsulate this philosophy and can be a catalyst for early stage success in a Digital Policy roll-out.

Canada does not have the luxury to wait for all public servants to catch up to digital norms. Canadians and the business community are depending on the Canadian Government to lead, not follow. As an example, we are already falling behind internationally on the deployment of 5G technologies, a core enabler of the near-future global digital economy. We have to move away from the mindset of a slow-moving resource-driven economy and fully embrace the tenets of a "Digital First" economy.

The need for improved digital and data literacy in the public service and the Canadian public is magnified by the ambitions of the Digital Policy initiative. Canada is at a disadvantage to some of its D9 partners because education is the domain of provinces and hinders the development of a national strategy to build digital and data literacy capacity at scale.

Creating a procedural framework for the proposal to "Ensure accessibility, openness, privacy and security are addressed at the design stage ...", must precede the rollout of the policy. It must be evolutionary but at the same time be measurable and assessable (e.g. risk assessments completed) so that digital solutions begin with a foundation of trust.

The proposal of an ethical framework for technologies like machine learning and artificial intelligence is a step in the right direction but a more formal, regulatory/oversight mechanism must be considered, to better serve Canadians interests and set an example for other levels of Canadian government and the private sector.

The need for a multi-stakeholder forum to build an engagement framework to support government collaboration with the private sector, academia, and the public.

Look for digital best practices internationally (e.g. D9 partnership) and in the private sector.

Feedback on the Process:

- 90% of the questionnaire respondents were federal public servants, with only 6% not public servants of any kind. This certainly skews the results and hampers the goal of a multi-stakeholder collaborative process. This over-representation of public servants combined with the federal government trailing the private sector and the general public in the use of innovative digital solutions and tools, limit the completeness of the digital policy development knowledgebase.
- The view toward implementing an iterative, continuous improvement process is a step in the right direction. The one constant in the digital space is change, both evolutionary and revolutionary, so the Canadian government is prudent to adopt an agile approach.

About ICTC

The Information and Communications Technology Council (ICTC) is a not-for-profit national centre of expertise on Canada's digital transformation. ICTC is the trusted source for evidence-based policy advice, forward looking research, and creative capacity building programs for the digital economy.

