

**Office of the  
Privacy Commissioner  
of Canada**

**Commissariat  
à la protection de  
la vie privée du Canada**



# **Review of the Personal Information Handling Practices of the Canadian Firearms Program**

**Department of Justice Canada and  
the Royal Canadian Mounted Police**

**Final Report – August 29, 2001**

**TABLE OF CONTENTS**

**EXECUTIVE SUMMARY** ..... 4

**REVIEW**..... 7

BACKGROUND ..... 7

SCOPE OF REVIEW..... 8

**PROGRAM PROFILE** ..... 9

AUTHORITY and MANDATE ..... 9

ROLES AND RESPONSIBILITIES OF PRINCIPAL PARTNERS ..... 10

        Department of Justice Canada (DOJ) ..... 11

        Royal Canadian Mounted Police (RCMP) ..... 12

        Chief Firearms Officers (CFOs)..... 12

        Canada Customs and Revenue Agency (CCRA) ..... 13

PERSONAL INFORMATION HOLDINGS ..... 13

        Canadian Firearms Registration System (CFRS)..... 14

        Canadian Firearms Registry On-line (CFRO) ..... 14

        Canadian Police Information Centre (CPIC) ..... 15

        Police Information Retrieval System (PIRS) ..... 15

        Provincial and Municipal Police Information Retrieval Systems..... 16

        Firearms Interest Police (FIP)..... 16

        Hardcopy Records ..... 17

**FINDINGS & RECOMMENDATIONS – PART I**..... 19

ACCESS & CORRECTION..... 19

        Personal Information Request Protocol..... 21

        Personal Information Banks in InfoSource ..... 23

COLLECTION ..... 25

        Police Information Retrieval System (PIRS) ..... 25

        Provincial and Municipal Police Information Retrieval Systems..... 27

        Firearms Interest Police (FIP)..... 28

        Social Insurance Number (SIN) ..... 29

        Collection from Credit Reporting Agencies ..... 29

        Telephone Monitoring at the Central Processing Site (CPS) ..... 30

        Information Obtained from Former Spouses..... 30

DISCLOSURE ..... 31

        Disclosure to Employers ..... 31

        Disclosure to Local Police Agencies ..... 31

        Disclosure to Chief Firearms Officers ..... 32

        Disclosure to Public through Appeal Process ..... 32

PROTECTION & SECURITY..... 33

        Verifiers' Expanded Role..... 35

RETENTION & DISPOSAL..... 35

**FINDINGS & RECOMMENDATIONS – PART II**..... 37

PERSONAL HISTORY QUESTIONS ON THE FIREARMS LICENCE APPLICATION FORM ..... 37

<b>APPENDIX A – Summary of Recommendations for Parts I and II .....</b>	<b>49</b>
<b>APPENDIX B – Complaints under the <i>Privacy Act</i> .....</b>	<b>53</b>
<b>APPENDIX C – Standard Compliance Review Objectives and Criteria.....</b>	<b>56</b>
<b>APPENDIX D – Summary of Key Statistics – Firearms Program .....</b>	<b>58</b>
<b>APPENDIX E – Highlights of <i>Firearms Act</i> and its <i>Regulations</i> .....</b>	<b>64</b>
<b>APPENDIX F – Privacy and Access Legislation in Provinces &amp; Territories .....</b>	<b>67</b>
<b>APPENDIX G – Memoranda of Understanding (Service Agreements) .....</b>	<b>69</b>
<b>APPENDIX H – Outstanding Issues .....</b>	<b>70</b>
Personal information handling practices by the CCRA.....	70
Outsourcing.....	70
International information sharing agreements.....	70
<b>APPENDIX I – Firearms Licence Application Form .....</b>	<b>71</b>
<b>APPENDIX J – List of Studies Reviewed.....</b>	<b>78</b>
<b>APPENDIX K – Breakdown of Questions 19(d) to (f).....</b>	<b>80</b>

### Glossary of Acronyms

<b>AFO</b>	Area Firearms Officer
<b>CCRA</b>	Canada Customs and Revenue Agency
<b>CFC</b>	Canadian Firearms Centre
<b>CFO</b>	Chief Firearms Officer
<b>CFR</b>	Canadian Firearms Registry
<b>CFRO</b>	Canadian Firearms Registry Online
<b>CFRS</b>	Canadian Firearms Registration System
<b>CPIC</b>	Canadian Police Information Centre
<b>CPS</b>	Central Processing Site
<b>DOJ</b>	Department of Justice Canada
<b>FAC</b>	Firearms Acquisition Certificate
<b>FIP</b>	Firearms Interest Police
<b>FO</b>	Firearms Officer
<b>FRT</b>	Firearms Reference Table
<b>IT</b>	Information Technology
<b>LFO</b>	Local Firearms Officer
<b>MOU</b>	Memorandum of Understanding
<b>NPS</b>	National Police Services
<b>NPSN</b>	National Police Services Network
<b>OPP</b>	Ontario Provincial Police
<b>ORI</b>	Originating Agency
<b>OSR</b>	Operational Statistical Reporting System
<b>PAL</b>	Possession and Acquisition Licence
<b>POL</b>	Possession-Only Licence
<b>PFO</b>	Provincial Firearms Officer
<b>PIRS</b>	Police Information Retrieval System
<b>QPS</b>	Québec Processing Site
<b>RCMP</b>	Royal Canadian Mounted Police
<b>RWRS</b>	Restricted Weapons Registration System
<b>UCR</b>	Uniform Crime Reporting

hit, for example, only the results of the investigation (approved or refused) with limited comments are entered in CFRS. The details about the secondary or tertiary screening investigation (such as police investigation reports and interview reports with spouses, neighbours or community leaders) are maintained by the provincial and territorial CFOs and/or their respective Area and Local FOs.

### **Canadian Firearms Registration System (CFRS)**

The CFRS is a fully integrated, automated information system that is used to enter, analyze, maintain and store all firearms-related information required under the *Firearms Act*. The CFRS provides administrative and enforcement support to all partners involved in the licensing of firearm owners/users, registration of all firearms, and the issuance of authorizations related to restricted firearms. This network links three areas of responsibility—the Central Processing Site (Justice), the provincial and territorial CFO offices, and the Canadian Firearms Registry (RCMP) by means of a secure national computer network. Data may be entered in one location, electronically processed in another, and access is obtained as required across the entire country.

Depending on the province, the CFRS can be shared among as many as the three levels of government (federal, provincial and municipal). The CFRS is not accessible to the private sector (i.e., gun dealers). The CFRS users include:

- the CPS in Miramichi and the QPS in Montreal for data capture, application processing, exception handling, financial administration, call centre, and records management purposes;
- the 13 CFOs (10 provinces and 3 territories) and their respective FOs for issuing licences and authorizations to carry and transport;
- the Registrar (RCMP) for firearms registrations and import/export authorizations, accreditation and verification; and
- police agencies across Canada for eligibility screening (tertiary field investigations), enforcement support, and recording of found, stolen, lost firearms.

### **Canadian Firearms Registry On-line (CFRO)**

The CFRO (a subset of the CFRS) is a component of the Canadian Police Information Centre (CPIC) designed to provide Canadian police forces with online information about registered firearms in a home or place of business. Police officers can obtain access to registry information from their vehicles or from a communications centre via CPIC. The information is read only and may be queried using name, address, telephone number, as well as the firearm's serial number, authorization number, certificate number, owner number, firearms identification number and licence number. The CFRO system receives an average of 1,800 queries per day.

On a daily basis, information that has been added to CFRS or changed within CFRS is transferred to CFRO. CFRO does not contain all of the information submitted on an application form. If a police officer requires information beyond what is in CFRO for investigation and