

**OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER OF BRITISH
COLUMBIA**

In the matter of the inquiry under part 5 of the *Freedom of Information and Protection of Privacy Act*

Between:

ROB WIPOND

The Applicant

And:

THE VICTORIA POLICE DEPARTMENT

The Public Body


AFFIDAVIT

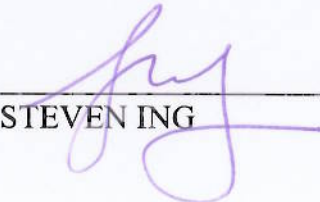
I, Steven Ing, peace officer, of 850 Caledonia Ave., Victoria, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I hold the rank of Deputy Chief Constable with the Victoria Police Department and as such have personal knowledge of the facts and matters hereinafter deposed to except where stated to be based on information and belief in which case I verily believe those facts to be true.
2. I have been a police officer with the Victoria Police Department since 1988. In my current position I am responsible for the administration of the Department, reporting directly to the Chief Constable. This includes executive oversight of investigation of complaints against police officers and human resources, managing civil litigation relating to police department operations, and developing standards and expectations that apply to all members of the organization.
3. I hold a Bachelor of Laws degree from the University of British Columbia and, in addition to traditional policing duties, prior to my current role I have held a number of administrative and executive assignments with the Victoria Police Department, including roles within the Information & Privacy and Legal Services sections and the Executive Services and Professional Standards and Human Resources Divisions. I have also been seconded to the then-named Public Safety and Solicitor General's Ministry, where I was responsible for providing advice to the Minister and other executive responsibilities including providing instructions to legal counsel within the Legal Services Branch.

4. Within the Victoria Police Department, only the senior executive managers (the Chief Constable and the two Deputy Chief Constables) are members of the British Columbia Association of Chiefs of Police (BCACP) and the British Columbia Association of Municipal Chiefs of Police (BCAMCP).
5. The BCACP consists of both active and associate members, where active members are defined as senior executive managers from various police agencies in British Columbia and associate members are defined as senior managers from non-police agencies that have a role related to law enforcement.
6. The BCAMCP consists of senior executive managers from either independent municipal police agencies, or Royal Canadian Mounted Police (RCMP) municipal detachments, and senior government officials who have a direct role in the administration of policing within British Columbia.
7. Regular membership in both of those organizations can generally be categorized as an activity involving participation, not direction. That is, during meetings of the two groups, members participate in discussions relating to both groups' objectives. Those objectives include:
 - (a) Encouraging and developing co-operation among all members in the pursuit of and attainment of their goals;
 - (b) Promoting a high standard of ethics, integrity, honour and conduct;
 - (c) Fostering uniformity of police practices
 - (d) Encouraging the development and implementation of efficient and effective practices in the prevention and detection of crime; and
 - (e) Effectively communicating problems and concerns to appropriate levels of authority.
8. As part of participation in the meetings of the two organizations, members often share information, including advice developed by or for their respective agencies, which may be relevant to the objectives of the two organizations. This is done on an express understanding that the information will be kept confidential and that sharing of the information does not constitute, in any sense, a waiver of confidentiality.
9. The two organizations also form a convenient forum for dissemination of police related information from the senior levels of government, including information about potential changes to policies or organizational modifications. It is not uncommon for representatives of the BC Government to attend at the meetings of the two organizations and provide updates on various projects and initiatives. Again, this information is shared on an expressed understanding that it would be kept confidential by the members.

10. In addition, individual members of the two groups may agree to work on various research projects relating to both groups' objectives, often resulting in the production of reports or memorandums which are then shared within the groups for discussion.
11. Senior executive police managers participate in both the BCACP and BCAMCP as part of their official policing responsibilities. As such, documentation from the groups' meetings, such as agendas and minutes, are kept within each police manager's respective agency. The most common method of storage of those documents is via the agency's e-mail system. All of these records are kept by the police managers in confidence as part of their overall policing duties.
12. Based on my nearly 27 years of experience in policing, including over 10 years performing various executive and administrative functions, I believe that the sharing of information between the members of the two organizations, as well as receipt of advice and information from the senior levels of government is critical to the better operation of the police agencies.

SWORN BEFORE ME at Victoria, British)
 Columbia on March 3, 2015)
 [signature] )
 [print name] Del Manak)
 A commissioner for taking affidavits within)
 British Columbia)


 STEVEN ING