

By email: info@oipc.bc.ca, correspondence@elections.bc.ca

October 05, 2026

Office of the Information and Privacy Commissioner for British Columbia
Commissioner Michael Harvey
PO Box 9038 Stn. Prov. Govt
Victoria B.C. V8W 9A4

Elections BC
Chief Electoral Officer Shipra Verma
PO Box 9275 Stn. Prov Govt
Victoria, BC V8W 9J6

Dear Commissioner Harvey and Chief Electoral Officer Verma,

Subject: 2026 update on Political Campaign Activity Code of Practice

We write to inquire about the status of the voluntary *Political Campaign Activity Code of Practice* (the “**Code**”) as it relates to ongoing provincial elections.

The original signatories when the *Code* was first announced in 2022 were the BC Green Party, BC United (then known as the BC Liberal Party), and BC NDP.¹ Since then, the province’s political party landscape has changed significantly; at the time the legislature was dissolved, the Conservative Party of BC and the OneBC Party held official party status — both newcomers since the *Code*’s launch.

In addition to changes in the party landscape, several other developments make the status of the *Code* and voter privacy generally even more pressing:

¹ Elections BC and Office of the Information and Privacy Commissioner for British Columbia, “Campaign Activity Code of Practice Supports Fair Campaigning and Protection of Personal Information in BC Elections,” accessed October 1, 2026, <https://elections.bc.ca/news/campaign-activity-code-of-practice-supports-fair-campaigning-and-protection-of-personal-information-in-bc-elections/>.

- In April 2026, Elections Alberta reported the Centurion Project had obtained and disclosed personal information from of the Republican Party of Alberta's copy of the List of Electors.²
- Continued litigation seeking to overturn the Supreme Court of British Columbia's 2024 decision that the *Personal Information Protection Act* ("PIPA") applies to federal political parties, in our view, indicates there is an insufficient culture of privacy among Canadian political campaigns across most of the political spectrum.³
- In September 2026, Canada's National Observer reported that a Toronto mayoral campaign ostensibly breached its own privacy policy in using an application to generate comments for the candidate's supporters online.⁴

At time of writing, we have not seen any published material from any political party that references the Code in relation to current and ongoing election campaigns. To that end, we write to seek confirmation on the following:

- **whether the original signatories remain parties to the *Code*;**
- **whether any new signatories have adopted the *Code* since 2022, and remain signatories;**
- **what evidence your offices have that the *Code* has changed the privacy practices of signatories or, at the very least, has promoted existing privacy practices consistent with *PIPA*, the *Election Act*, and modern privacy management programs;**
- **whether and how the *Code's* principles apply to candidates and registered elector organizations participating in general local elections; and**
- **whether your offices plan, within their respective mandates, to invite those candidates and elector organizations to adopt the *Code*, or to develop a corresponding voluntary code tailored to local government election campaigns.**

² Vincent McDermott, "Court Documents Show New Details on Elections Alberta Probe into Voter Information Breach," CBC News, May 15, 2026, <https://www.cbc.ca/news/canada/edmonton/court-documents-voter-list-9.7201375>; Wallis Snowden, "Elections Alberta Issues Cease-and-Desist Letters over Voter Info Breach, Privacy Commissioner Launches Probe," CBC News, May 7, 2026, <https://www.cbc.ca/news/canada/edmonton/centurion-project-alberta-voters-list-leak-9.7191390>.

³ Sara Bannerman, "Canada's Three Main Federal Political Parties Are Working Together to Fight Voter Privacy Rights," The Conversation, March 11, 2026, <https://doi.org/10.64628/AAM.4u3ryxk9v>.

⁴ Rory White, "Toronto Mayoral Candidate Bradford Using Israeli App That Feeds Supporters AI-Generated Comments," *Canada's National Observer*, September 18, 2026, <https://www.nationalobserver.com/2026/09/21/investigations/ai-app-suggests-posts-brad-bradford-supporters>.

Given the timelines and stakes involved in the current provincial and general local elections, we would welcome a public response as soon as possible, with any guidance relevant to local campaigns issued promptly and a response to the above questions before advance voting begins.

FIPA's interest in this matter, as always, remains enhancing voter privacy rights, which we know Canadians value.⁵

Sincerely,

BC Freedom of Information and Privacy Association

BC Civil Liberties Association

⁵ BC Freedom of Information and Privacy Association et al., "2026 IPSOS Political Privacy Survey," Voterprivacy.ca, accessed October 1, 2026, <https://action.open-media.org/page/190635/action/1?locale=en-US>.