

Minto Mine Socio-Economic Monitoring Program

Components, Information and Program Requirements

Amended 2018

Prepared in collaboration by:

Selkirk First Nation

Yukon Government

Capstone Mining Corp. – Minto Mine



**Yukon**

**capstone**
MINTO MINE

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Minto Mine Socio-Economic Monitoring Program – Components, Information and Program Requirements¹

1 Introduction

Minto Explorations Limited (Minto), the Yukon Government (YG) and the Selkirk First Nation (SFN) – the “Parties” - recognize their respective responsibilities and interests in protecting and promoting the economic and social and cultural well-being of peoples and communities affected by the development of the Minto Mine. To that end the Parties are committed to monitoring the activities of the Minto Mine in order to promote and enhance the economic benefits and avoid or minimize the adverse socio-economic effects on health and well-being that may result from the mine’s activities.

The Yukon Government Decision Document (2010-0198 YESAA Decision Document) states that:

the project-specific socio-economic and socio-cultural effects monitoring program shall result in an annual report. Ideally the first report would include all the data available at the time of writing and preferably all project phases (construction, operation and closure). The development of the monitoring program should consider what are currently known effects but should also remain flexible so that unforeseen effects can be incorporated. The following list of indicators of direct and indirect socio-economic and socio-cultural effects is provided for illustrative purposes; it should not be considered definitive: Employment and income data and information for Minto Mine; Contracting and business expenditures and distribution; Workforce development data and information; Cultural and community well-being; and Cumulative summaries for all project phases and years.

The Selkirk First Nation Decision Document for the Minto Mine - Phase IV Expansion (further to the Project Assessment 2010-0198 YESAB - Mayo Designated Office Evaluation Report dated February 18, 2011) states that:

Selkirk accepts YESAB’s recommendation under YESAA ss. 110(1) that monitoring of Project effects be conducted and, to that end, that the Project-specific monitoring program and the Cumulative Effects monitoring program described in the Report be considered, with the following variations:

(a) *the Project-specific monitoring program.*

This program shall be led by the Proponent, working with Selkirk and the Government of Yukon. The framework for specific information and reporting requirements for the program should be confirmed by all parties no later than August 31, 2011.

Variation Rationale: Provide guidance for program execution and deliverable.

This report describes a framework for monitoring direct and indirect socio-economic effects from the

¹ This framework was developed by the Minto Mine Tri-Partite Working Group: Lindsay Staples and Lois Craig on behalf of the Selkirk First Nation, Jennie Gjertsen on behalf of Minto Explorations Ltd, and Bryony McIntyre, Rachel Westfall and Julie Stinson on behalf of the Yukon Government.

Minto mine. It describes key or highly valued conditions that could be affected positively and negatively by the mine. It also describes a general program for implementing the monitoring framework.

2 Socio-Economic Monitoring Program Purpose

The purpose of the program is to monitor the socio-economic effects² from the Minto Mine's construction, operations and closure phases in order to accomplish the following:

- a) Verify the predicted socio-economic effects, including predictions of *no effect* or *no significance*, of the Project as summarized in Minto's environmental impact assessment;
- b) Identify unforeseen socio-economic effects of the Project;
- c) Evaluate the effectiveness of mitigation measures in managing socio-economic effects;
- d) Document changing socio-economic conditions affecting or affected by the Project (including attribution of causality) and contribute to improving baseline data at a local, regional and territorial level;
- e) Verify project-related commitments are implemented by Minto, YG and SFN;
- f) Report the results of monitoring to Minto, YG and SFN;
- g) Inform an adaptive management approach by Minto, YG and SFN and provide for alternate mitigation and management actions where warranted;
- h) Inform future socio-economic effects assessment associated with mine expansion; and
- i) Contribute to the assessment, management and monitoring of regional cumulative effects resulting from effects of the Minto Mine in combination with socio-economic effects resulting from past, present and (reasonably foreseeable) future developments and changing environmental conditions

3 Scope

3.1 Monitoring Program Areas

Socio-economic monitoring of the Project addresses valued socio-economic conditions in the following areas that are affected or potentially affected directly and indirectly by the Minto Mine:

Population and health

- Community stability and well-being
- Family stability and well-being
- Individual health and well-being
- Housing

Material well-being

- Income and income distribution
- Employment
- Business

² Herein, socio-economic effects are inclusive of socio-cultural effects.

- Traditional economy

Capacity, training and education

- Education
- Training

Cultural well-being

- Connections to land and water
- Cultural vitality
- Social cohesion

Sustainability and legacy

- Fate control and preparedness
- Boom/bust management,
- Intergenerational equity

3.2 Spatial Boundaries

The monitoring framework includes Pelly Crossing-specific community-level data, regional and territory-wide data as appropriate.

3.3 Temporal Boundaries

The monitoring framework establishes a pre-project baseline for select indicators where supporting information is available in 2001 or as soon as possible thereafter.

4 Approach and Methods

In establishing a set of socio-economic conditions for monitoring Project-related effects, a large number of core conditions are potentially available to choose from and a larger number of indicators for measuring them.³ Core conditions, also known as Valued Components (VCs), are those social, economic and cultural matters that are of greatest importance and concern to the affected Parties and that may be affected positively and negatively by the direct and indirect effects of the Project.

The VCs identified in the framework are subject to ongoing review, evaluation and confirmation by SFN, YG and Minto. As the people and community most directly affected by the Project, the significance and choice of VCs in representing the response of selected socio-economic and socio-cultural conditions to

³ Gerard Duhaime, Edmund Searles, Peter J. Usher, Heather Myers and Pierre Frechette, "Social Cohesion and Living Conditions in the Canadian Arctic: From Theory to Measurement," *Social Indicators Research* 66: 295–317, 2004.

the Project is of special interest and importance to the SFN.

A general challenge for socio-economic impact assessment and monitoring in the Yukon is the limitations associated with community-level data that currently measure all but the most basic socio-economic conditions.⁴ Some data are suppressed to protect the identity of individuals living in small Yukon communities like Pelly Crossing (“Pelly”) or to protect any information deemed confidential. Other data have not been routinely collected in the Yukon either because policy has not provided for it or it has not been viewed as a necessity. In implementing the framework, the Minto Mine socio-economic monitoring program will be challenged to improve on the current state of deficient data for measuring Project socio-economic effects on the community of Pelly Crossing and SFN citizens.⁵

4.1 Data Types and Sources

Yukon-wide data

YG collects and compiles certain territory-wide administrative data that is useful for monitoring socio-economic conditions throughout the Yukon and for comparative purposes with Pelly Crossing. Yukon-wide and community-level socio-economic conditions reported by YG rely heavily on the National Household Survey (Census) conducted every five years. Surveys conducted in 2001, 2006 and 2011 and every five years thereafter are of relevance to the monitoring program. Some additional data related to employment, business activity⁶, education (enrollment) and crime are available annually, in addition to one-time surveys conducted on specific matters (eg. housing, social inclusion, etc.).

At the community level, researchers and others have long relied on data from the Census that is conducted every five years. Prior to 2011, the Census included a Part B (the long form) that captured comprehensive details regarding several key socio-economic aspects in the lives of Canadians. The long form was generally applied to a sample of 20% of Canadians. In Yukon (and elsewhere in the North), Statistics Canada applied it to 100% of the residents of rural communities to ensure that the data for those communities was statistically significant. Respondents were legally required to complete the long form; generally, this resulted in a very high completion rate and helped ensure statistical validity.

For the 2011 Census, the federal government replaced the mandatory long form census with the voluntary National Household Survey, which was sent to 30% of households. The completion rates for this now-voluntary survey plunged, making much of the data suspect and difficult to compare accurately against prior census data, especially for small communities. The 2016 Census has reinstated the

⁴ For example, see Paul Kischuck, *Yukon Socio-economic Data Gap Analysis*, Prepared by Vector Research and Submitted to Yukon Bureau of Statistics and Yukon Environmental and Socio-economic Assessment and Review Board, May 2009.

⁵ See Senada Delic, “Statistical Information Pertaining to Socio-Economic Conditions of Northern Aboriginal People in Canada: Sources and Limitations” in *The Northern Review* 30: 119 – 150, 2004, 2009.

⁶ As of 2013, no longer available.

mandatory long form survey. The 2016 Report should incorporate all the results from the 2016 Census.

Minto's corporate data may be limited by certain factors, including without limitation the fact that the monitoring framework and its indicators were not developed and adopted until well into the mine's operation, and by changes in corporate ownership and staff. As a result, data provided by Minto and its contractors may not be consistent with regards to how they were reported for some indicators.

SFN administrative data, especially in regard to their retrieval across years previous to 2015, are compromised by data management system challenges. It is anticipated that these will be addressed in future years resulting in a higher data quality.

Community-level data

Some community-level data for measuring socio-economic conditions in Pelly Crossing are available in the Aboriginal People's Survey and the Regional Healthy Survey. SFN has participated in the Aboriginal Peoples Survey (APS) – a supplement to the National Household Survey. It is a thematic survey and collects information on education and employment, health, language, housing and mobility. The APS is conducted every five years. APS data of possible relevance to the monitoring program for Pelly exist for 2002 and 2007, however the quality and applicability of this data remains to be confirmed. In late 2012, a separate survey to replace the APS will be conducted by the First Nations Governance Information Centre for northern communities, like Pelly. However, this will affect the sample design and the comparability with previous APS survey cycles.

APS data requires the permission of SFN for its release. It includes objective and subjective measures of socio-economic conditions at the individual, household and community levels. It uses random sampling and the reliability of the sampling technique for Pelly has not been confirmed. In addition, due to the small size of the community, some data will be suppressed for reasons of confidentiality.

Some of the most useful and relevant questions pertaining to aboriginal traditional economies in the APS are confined to the "Arctic Supplement" section.⁷ This section of the survey focused exclusively on participating Canadian Inuit. No comparable First Nation data exist in the APS. In the case of a rural and remote First Nation community, like Pelly Crossing, where land-based economic activity remains strong, it is desirable to collect this type of information.

SFN has also participated in the First Nations Regional Health Survey (RHS) – a national health survey operated by First Nations. The RHS provides a range of objective and subjective data on many socio-economic conditions that, in addition to other considerations, are determinants of health. RHS data supplements the APS data in important ways, especially with regard to First Nations' traditional use. However, coverage is very limited in this respect, especially in comparison to the Arctic Supplement (for Canadian Inuit) of the APS.

⁷ See Statistics Canada, Aboriginal Peoples Survey 2001, Part 3.

SFN holds RHS data for 2002 and 2008. Future surveys will be conducted every four years until 2016. RHS data requires the permission of SFN for its release. The reliability and usefulness of the existing RHS Pelly-related data for the purposes of the socio-economic monitoring program are very low due to serious methodological limitations and errors. The 2002 and 2008 data will not be used in the program.

The Community Well-Being (CWB) Index is a method of assessing socio-economic well-being in Canadian communities. It combines census data on income, educational attainment, labour force activity, and housing into well-being “scores” for each of the several thousand communities in Canada. The CWB Index was first released in 2004.

CWB Index scores have been calculated for 1981, 1991, 1996, 2001 and 2006. Scores will be calculated for future censuses as data become available. However, the reliability of this data as it applies to Pelly Crossing has not been confirmed. Limitations of the National Household Survey data as they apply to Pelly Crossing also hold for the CWB Index.

Other information for Pelly Crossing and SFN citizens exist outside of survey data. Over the last 25 years, reports related to the traditional economy, health needs assessment, mental health and an integrated community sustainability plan are some of the documents that can contribute to the construction of an improved pre-project baseline.

In summary, the usefulness of historic community-level data for Pelly collected since 2001 or earlier are not adequate for complete or even reasonable coverage of the VCs identified in the socio-economic monitoring framework. In all likelihood, they will not be adequate for monitoring socio-economic effects resulting from the Minto mine and other similar developments in the future. That said, they still remain helpful in partially describing a historic baseline that is generally data deficient.

Pelly Crossing requires a dedicated household survey to collect the type of information required to monitor the potential effects of the Minto mine on SFN citizens and the community of Pelly Crossing. A community-level survey of all SFN households in Pelly Crossing and elsewhere conducted at five year intervals, at the mid-point in the Census five-year census period is an essential element in the socio-economic monitoring framework and the Minto mine socio-economic monitoring program.

Project-specific data

Minto collects administrative data in conjunction with mining operations. Minto is in a position to provide Project-specific economic data (community, territory and national-level data) that document employment, income and business activity resulting from the mine’s construction, operations and closure. These data are essential to the monitoring program and are compiled bi-annually and annually. Minto’s corporate data may be limited by certain factors, including without limitation the fact that the monitoring framework and its indicators were not developed and adopted until well into the mine’s operation, and by changes in corporate ownership and staff. As a result, data provided by Minto and its contractors may

not be consistent with regards to how they are reported for some indicators.

4.2 Core Socio-Economic Conditions and Valued Components

A set of five core socio-economic conditions to be monitored by the program and 16 valued components (VCs) that identify important features or elements of these core conditions are listed below (also, see Appendix):

Core condition:	Population and Health
Valued Components:	Community Stability and Well-Being Family Stability and Well-Being Health Housing
Core condition:	Material Well-Being
Valued Components:	Income and Income Distribution Employment Business Traditional Economy
Core condition:	Capacity, Training and Education
Valued Components:	Employment and Workforce Development Education and Training
Core condition:	Cultural Well-Being
Valued Components:	Connection to Land and Water Cultural Vitality Social Cohesion
Core condition:	Sustainability and Legacy
Valued Components:	Fate Control and Preparedness Boom and Bust Management Costs and Benefits for Future Generations

The sixteen Valued Components (or key elements of the Pelly Crossing and Yukon socio-economic systems) are based on the following assumptions:

- Social relationships are an important reason why people choose to remain in small communities, like Pelly, despite a lower, cash-based standard of living;
- Overall well-being and social problems are both related to a combination of other dimensions of living conditions including domestic and cash production, strength of cultural values, social participation, physical and mental health, and a sense of local control;

- The combination of hunting, fishing, gathering, and cash sectors of the economy continue to define the prevailing way of life of SFN citizens living in Pelly Crossing;
- Traditional harvesting activities provide a physical, cultural and spiritual connection to the land and contribute to social cohesion in the community;
- The persistence of a mixed economy is both a matter of necessity for some and choice for others;
- Employment and business opportunities provide a means for participation in local and territorial economies, the capture of economic benefits and the development of economic self-reliance and wealth creation;
- Training and education are an important factor influencing participation in the northern cash economy and economic opportunities; and
- Positive contributions to sustainability from development avoid displacement of costs and create opportunities and benefits for future generations

4.3 Indicators

There are numerous potential indicators for the measure of the VCs and conditions identified above. The challenge is to select a set of indicators for each VC that are clear, easy to interpret and meaningful for understanding the socio-economic conditions that are being measured. Indicators as measures of the condition of a VC are central to defining it. In order to understand how the Project may directly or indirectly affect a condition (positively or negatively), documenting trends and measuring change over time are important. The quality of the data, availability and affordability, the scale that the data could be applied to for comparative purposes, and the inclusiveness of the data (distinguishing groups and sub-groups within a population) are important considerations in selecting indicators.

Other important considerations in selecting socio-economic indicators for the program are related to pragmatism - they should be reasonably straight-forward to implement. In this regard, it is helpful if the chosen indicators are:

- **Comprehensive** (in measuring the important aspects of a socio-economic condition);
- **Limited** (in that they are relatively few in number per VC);
- **Subjective and objective measures;**
- **Direct measures of conditions** (in that higher values are positive expressions of a condition);

- **Measures of average levels and distributions of conditions** (in a population of people), and most importantly;
- **Accurate reflections of reality.**

In 2018, revisions were made to a number of indicators measuring SFN living conditions that were proposed in the original 2013 Mine Socio-Economic Effects Monitoring Program Framework. Revisions to these indicators were made for the following reasons:

- deletions and additions to better reflect the available data, especially with regard to the data collected in the 2015 SFN Household Survey of Living Conditions;
- deletions to eliminate numerical duplication of certain indicators; and
- deletions to eliminate indicators where data were not and would not be available.

These revisions were reflected in the 2015 Minto Mine Socio-economic Monitoring Program Report that was released in 2018.

Appendix A identifies a consolidated list of the revised list of socio-economic indicators for each core condition and Valued Component, their spatial scale, the source (YG, SFN or Minto) of that data and information, the frequency with which it is collected, who (YG, SFN or Minto) provides it and the supporting rationale. Some of the source data are collected bi-annually and annually and some at five-year intervals. Regardless of when it is collected, all data are compiled and reported either bi-annually or annually. Sixty-five indicators are listed in the appendix. With revisions, the numbering of indicators in the 2018 Framework (as a result of additions and deletions) is no longer continuous or sequential.

4.4 Data Needs and Project-sponsored Community Surveys

The limited availability of community-level data to measure local socio-economic conditions is one of the greatest challenges facing the Minto mine socio-economic monitoring program. Where community-level data exist, it is largely available only every five (Census, APS) years. In many instances, no data is currently available to support a number of indicators.

The Minto mine socio-economic monitoring program addresses this limitation and deficiency through the use of a community-level survey of SFN households in Pelly Crossing and elsewhere conducted every five years at the mid-point in the National Household Survey's five-year cycle. Some of the indicators identified in Appendix 1 derive from questions in the Arctic Supplement of the APS.

In the absence of historic quantitative data for a number of VCs that measure change over time (positive and negative trends) prior to and since the commencement of the Project, qualitative recall and retrospective information collected through the household survey and community round tables or focus

groups are considered.

In addition, Minto provides access to the Project site and to employees for a designated party to conduct an annual employee survey on select matters associated with the VCs or general matters of community concern.

4.5 Qualitative data and round tables

Deficiencies and limitations in quantitative data are offset by the use of qualitative data that provide subjective perspectives and judgments about the relative state (past, present and future) of a VC or core socio-economic condition. The use periodically of select discussion focus groups and round tables and consultations on specific themes or topics by MEL, SFN and YG are an important means for providing timely information in a cost-efficient manner on the state of certain socio-economic conditions and the perceived effect of the Project, if any, on those conditions. Round tables will be undertaken when a party or parties choose to pursue them.

Community round tables in Pelly may also supplement household survey information where ambiguity, uncertainty or gaps may exist. They involve SFN leadership, staff or citizens as appropriate.

4.6 Data ownership, release and managing sensitive information

It is understood by the Parties that each Party owns the data and information that they are providing unless stated otherwise. For greater certainty, SFN owns the data collected in the household survey of SFN citizens. It is also understood that the data and information submitted by the Parties will only be in a format that can be shared publicly, as the consolidated annual monitoring report shall be made available to the public. Confidential and sensitive personal information shall not be shared, except in an aggregate format that protects personal privacy.

The Minto socio-economic monitoring program is guided by Yukon Bureau of Statistics Policy on Managing Socio-Economic Information as attached in Appendix B. Within the general guidance of that policy, each Party determines the treatment and use of and access to the information for which they are directly responsible, own or have provided.

Subject to a formal agreement, SFN and the Yukon Bureau of Statistics (“YBS”) may arrange for YBS to provide secure back-up and storage of SFN household survey data.

5 Roles of the Parties and the Working Group

An effective monitoring program requires the cooperation of YG, SFN and Minto in data collection, data sharing and reporting, data analysis and the issuance of a monitoring report. A tri-partite working group (“the Working Group” (WG)) of the Parties has been established to oversee the design and implementation of a Minto socio-economic monitoring program.

The design phase and the implementation phase of the program requires the participation of different representatives for each Party as determined by that Party. The Working group and its members assume the following responsibilities:

- a) Minto shall collect and provide administrative data and other information relating to Project direct employment, training and procurement, worker safety and contributions to community wellness and sustainability to the WG bi-annually and annually as described in Appendix A and an annual report summarizing this information;
- b) SFN shall collect data relating to living conditions and cultural conditions of SFN citizens and interpreting Project-related experiences at the community level as assigned in Appendix A for submission to the WG annually;
- c) YG shall compile public statistics collected at the national, territorial and community level relevant to the Project and other information as assigned in Appendix A for submission to the WG annually;
- d) The WG shall assign the analysis of the data and information submitted by the Parties - (and described in (a), (b) and (c) above) - to an independent consultant selected and administered by the WG and contracted by Minto to prepare the consolidated annual monitoring report;
- e) The WG shall review the consolidated annual report monitoring report and provide comments and recommendations to their senior officials regarding the management of the Project’s socio-economic effects;
- f) The WG shall review the performance of the monitoring program having considered the objectives of the program and provide recommendations for adjustments to the program as appropriate;
- g) Minto shall provide support functions for convening meetings of the WG on a bi-annual basis or otherwise as agreed by the Parties; and

6 Reports

6.1 Reports by Party

Minto shall submit bi-annual information and an annual report to the WG as outlined in Appendix A.

Minto shall report the following data including its analysis and interpretation of that data:

- a) Employment, income and training data and initiatives;
- b) Capital procurement data and initiatives, and economic and business opportunity initiatives;
- c) Cultural well-being and community wellness initiatives; and
- d) The results of any exit surveys of people leaving the employment of the Project.

6.2 Consolidated Annual Monitoring Program Report

The WG assumes responsibility for synthesis and analysis of the data and information submitted by the Parties (as per 5.0 (a),(b),(c) and (d)) and issuing a consolidated monitoring report annually. In addition to data and information collected annually, five- year data sets will be included in the report for benchmark reference.

The content of the report shall include:

1. Summary statements of Project predictions
2. Summary statements of Project commitments
3. Summary of Socio-Economic Impacts on each VC in the following areas:
 - Population and health
 - Material well-being
 - Capacity, training and education
 - Cultural well-being
 - Sustainability
4. Management actions and mitigations to respond to findings and conclusions resulting from the analysis of Project impacts.

7 Program Implementation

The monitoring program shall be implemented on the basis of the following annual milestones within a calendar year:

January 31st

- Minto annual report submitted to WG
- all other required monitoring information submitted by Parties to WG consultant for preparation of annual consolidated monitoring report

April 30th

- draft annual consolidated monitoring report submitted by consultant to WG

May 31st

- Completion of Pelly round tables on select topics

- Completion of WG review of draft annual consolidated monitoring report + preparation of recommendations
- Submission of draft annual consolidated monitoring report with comments and recommendations to parties

June 30th

- Completion of final annual consolidate monitoring report
- Minto semi-annual data submitted to WG

July 31st

- Completion of WG review of Minto semi-annual data submission

8 Budget

Monetary funding is required for several components of the Socio-economic monitoring program, including but not limited to the SFN household survey, annual reporting and administrative costs associated with the program such as community meetings. The WG will annually review the approved budget and cost allocations, and recommend any adjustments as required to their respective principals by September 30 of each year.

Appendix A: Socio-Economic Conditions: Consolidated Minto Mine/SFN/YG Source Information

Appendix B: Yukon Bureau of Statistics Internal Policy on Managing Sensitive Information

8.1 Background

Section 9 of the *Statistics Act* restricts the Bureau of Statistics from publishing or otherwise sharing confidential information in any manner that makes it possible to identify individual people, businesses or organizations.

The *Statistics Act* makes several exemptions. For instance, Section 9(3) states that if someone consents in writing to having information about him/her or his/her business released, the Bureau may do so. Also, the Bureau can release information such as the names, telephone numbers, and locations of businesses and organizations, as well as details about the products and services handled by those organizations.

Additionally, Section 11 of the *Statistics Act* sets out parameters for sharing of information with Statistics Canada.

Section 12 sets out conditions under which the Bureau may enter into an agreement to collect information for government departments and agencies, Yukon First Nations, corporations, and other organizations, and to share that information with other parties. In these cases, an agreement must be made that the information will be shared, and respondents must be informed about the data sharing agreement. If the respondent objects to having their information shared, the Bureau may not share their information in a format in which the individual can be identified.

This policy provides the Bureau with guidelines for the management of sensitive information.

8.2 Guidelines on the release of personal information

Suppression is one tool that can be used to protect information about individuals who may be identified due to the small number of people who share their circumstances. If a very small number of people share a certain characteristic, the information is suppressed in any report.

A second tool that can protect individuals from being identified is amalgamation. This is where categories are combined so that there are fewer categories in the presentation of the data, but more people fall into each category.

There are no universal standards for minimum allowable cell sizes for the publication or release of sensitive information.

Whenever information comes from an outside source such as Statistics Canada, the suppression requirements of that organization for that dataset shall apply, if applicable. If information is already made public without suppression, the Bureau may reproduce that information without altering it.

Information gathered by the Bureau of Statistics is not considered confidential if explicit consent to publicly release the information has been obtained in writing from the person or people to whom the information refers.

Whenever non-statistical information is generated at the Bureau of Statistics, it may be referenced without suppression as long as any personal identifiers have been removed. For instance, a person speaking at a focus group may be directly quoted, providing the quote does not contain sufficient information about the individual or his/her personal circumstances to allow others to identify the individual.

Whenever statistical tabulations are generated at the Bureau of Statistics, as a rule of thumb, cells must be suppressed or amalgamated with other cells whenever the data in the cell is based on 1 to 4 individual people, businesses or organizations. The suppression rule applies not only to the cell, but also to any row, column, or page totals which would allow the reader of any report to calculate the number in the cell even when it is suppressed. Cells with data for 5 or greater entities may be released, as long as the cell size is not so small it draws question as to the validity of the data.

This rule of thumb may be over-ridden in cases where smaller or larger suppression requirements make sense for a particular project, as long as that decision and its reasoning are documented in writing in the project file, and are approved by the Director and the lead representative of the Client department which requested the work (if applicable). A special case of this would be where the statistic produced for a single cell may be known to be closely aligned with a single respondent. For example, if we wish to calculate total revenues of a set of businesses, of which one is known to have a dominant market share, then this set of businesses will need to be large for the release of this information not to allow data users to get an idea of the revenue of the dominant business in the cell.

When information is gathered for a Client and that Client is to be provided the entire dataset, and the requirements of the *Statistics Act* (Section 9 (2b) and Section 12) are followed to allow the dataset to be shared with the Client, the Bureau will provide the Client with a copy of this Policy as well as any alternate suppression guidelines that are on file for that project.

8.3 Document retention

Evidence of consent to share information, data sharing agreements, and documentation of any project-specific data suppression requirements will be retained according to the same

document retention procedures and schedule that apply to the Request for Research Project, budget and other crucial project documents.

Adopted June 7, 2011

Inquiries

Inquiries concerning this policy are to be directed to the Yukon Bureau of Statistics, at 1-867-667-5640.