



Office of the Information and
Privacy Commissioner of Alberta



Information Sharing

AFNIGC - Privacy Education Series

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Agenda

- Misconceptions
- Definition
- Review of legislation (disclosure provisions)
- Best practices for information sharing
- Questions



Misconceptions



- Privacy laws ban the sharing of information
- Researchers can never access the information an organization holds about individuals
- Secondary uses of information are prohibited



Information Sharing?

- Not defined in legislation as a concept
- May be achieved in more than one way
- Usually does not refer to:
 - Responding to access requests
 - Ad hoc disclosures



Review of Legislation



- Three common approaches:
 - With individuals' consent
 - If it is not individually identifying
 - If there is specific legal authority to disclose



Disclosures of information

- If it is not individually identifying:
 - May be easier to disclose
 - Specific rules still exist
- With individual consent:
 - Consider requirements for consent
- If there is legal authority to disclose:
 - Various allowable disclosures
 - Emergencies, other laws, fraud prevention, debt owing, government operations, etc...



Best Practices

- Transparency
- Legal Authority
- Privacy Impact Assessments
- Access and Correction
- Accountability
- Oversight



Transparency

- Be open and transparent about the nature of the information sharing initiative by outlining:
 - Who the participants in the initiative are.
 - How the initiative will be implemented.
 - What information will be collected and used, and for what purposes.
 - What information will be disclosed or shared, to whom, and for what purposes.
 - How individuals can ask questions and obtain information about how the program will work.



Legal Authority

- Ensure each participant has the necessary legal authority to collect, use and disclose or share personal or health information to embark on these initiatives
- Ensure each participant is subject to access and privacy laws



Access and Correction

- Information sharing initiatives reduce individual control
- Difficult for individuals to know what information has been collected and shared, for what purposes and to whom.



Accountability

- Accountability is the acceptance of responsibility
- Remain accountable by:
 - Only sharing the least amount of information needed
 - Having reasonable and necessary safeguards in place
 - Establishing and follow policies and procedures
 - Providing regular and ongoing training
 - Reviewing and evaluating the information sharing initiative on a regular basis



Oversight

- Establish proper governance and oversight internally
- Consult with the Information and Privacy Commissioner to identify and address potential implications for the protection of privacy and access to information



Questions?



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Thank you!

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Resources

- “Principles for Getting Information Sharing Right”, OIPC website
<https://www.oipc.ab.ca/resources/principles-for-getting-information-sharing-right-advisory.aspx>
- “Government Information Sharing: Is Data Going Out of the Silos, Into the Mines?”, OIPC website
<https://www.oipc.ab.ca/resources/government-information-sharing-independent-research.aspx>
- FOIP Bulletin No. 8 “Common or Integrated Programs or Services”, Service Alberta website
<https://www.servicealberta.ca/foip/documents/bulletin8.pdf>

