



# Information Sharing Guide

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FOR SOCIAL-BASED SERVICE DESIGN AND DELIVERY

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*This guide was developed in partnership with the Information Sharing Strategy participating ministries: Children's Services, Community and Social Services, Education, Health, Justice and Solicitor General, Seniors and Housing, and Service Alberta.*

*It is not intended to provide legal advice and is not to be used as a substitute for legal advice. If there is any doubt about the proper application or interpretation of the relevant privacy legislation please review the provisions, or consult with your privacy coordinator or legal counsel.*

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## Introduction

The Alberta government is committed to working more effectively and collaboratively with social-based service delivery organizations to ensure a holistic approach is used to enable better outcomes when providing services to Albertans and their families.

Working together to achieve better outcomes also requires a clear understanding of the roles and responsibilities of the various organizations, based on a deeper analysis of what is required to support a collaborative or integrated approach.

Social-based organizations internal and external to government can meet the needs of Albertans more effectively through **collaborative, coordinated and integrated service delivery**. Working in this manner enables a citizen-centred focus that considers an individual's immediate and long-term needs. Partner organizations need to be on the same page and working towards the same goal – ensuring Albertans receive the right services at the right time.

## Who should use these resources?

The *Information Sharing Guide for Social-based Service Design and Delivery* introduces an overarching approach to support program design and delivery that provides for accountable and effective information sharing practices.

It is accompanied by an *Information Sharing Toolkit* with resources such as themed frequently asked questions and checklists. These resources will be helpful for decision-makers and frontline delivery staff in understanding how to operationalize information sharing best practices in their daily work.

This guide is intended for subject matter experts including privacy specialists, legal advisors, program and policy advisors, and decision-makers from partnering organizations.

This guide applies to the decision-makers within government programs and services, health care organizations, contracted service provider agencies and other community agencies.

**Note:** The term 'Service Provider' is defined more narrowly under the *Children First Act*.

## Understanding service design and delivery

Designing and implementing a coordinated or integrated approach to a program or service considers the need for authorized information sharing among organizations and the need to respect the privacy and security requirements set in legislation, policy and emerging practices.

### Collaborative or coordinated service delivery

These are service delivery approaches that involve coordinating services across multiple organizations with the shared goal of providing consistent and seamless services to Albertans.

Partner organizations have a shared understanding of their roles and responsibilities and share information in a timely and authorized way according to common operating principles as well as guidelines, processes and best practices.

### Integrated service delivery

This is an approach that involves one or more organizations working closely together and sharing information based on more formalized and overarching governance, policies, systems and processes than collaborative and coordinated service delivery.

This enables partner organizations to share information as appropriate and authorized, seamlessly providing Albertans with a continuum of preventative and responsive supports to meet their individual needs over time.

## Taking an Information Sharing Approach to service design

The Information Sharing Approach consists of seven elements, all of which must be addressed when a program or service is being planned and designed. By working through these seven elements, you will be able to identify the information sharing requirements for collaborative, coordinated or integrated service delivery.



Review this guide and use the Information Sharing Approach Template on page nine when designing a program or service to determine:

- who needs to be involved and how they will work together;
- a shared vision, principles and purpose;
- each partner's legislation and authority to share information;
- governance, including a mandate, the structure and tools needed to share information appropriately, each partner's roles and responsibilities, decision-making and conflict-resolution processes;
- how to balance risks when deciding whether or not to share information, and how to manage risk when sharing information;
- the policies, procedures and practices required for effective and appropriate information sharing; and
- the change management strategies, communications resources, education and training required to facilitate an information sharing culture.

With this knowledge, you can proactively plan and ensure you and your partners:

- have the proper authority and information management controls in place to support measurable outcomes;
- address the requirements, issues and risks associated with privacy, confidentiality and security;
- balance a program or organization's need for information with the individual's privacy rights; and
- understand how to effectively share and manage information to properly monitor and evaluate services to ensure compliance audits are achievable.

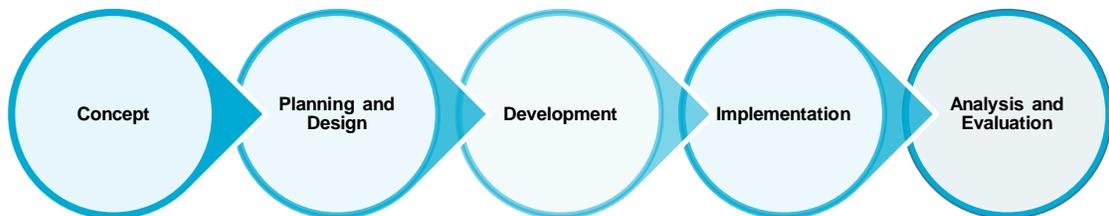
Working together to build and implement a program or service to which an information sharing lens has been applied promotes due diligence, accountability and transparency. This allows for the best possible decisions to be made to support Albertans' health, education and safety, which in turn helps them achieve better outcomes.

## Working through each element



Consider who needs to contribute to the program or service and how they will work together. Implementing a project management process and tools will make it easier for you and your partner organizations to work together. Delivering a project from concept to evaluation requires a team of subject matter experts. Project management combines the strengths of a team to deliver the end product – a program or service grounded in information sharing that achieves a clearly defined purpose and outcomes.

### Sample Project Management Process



Working from a shared vision and principles will guide you and your partner organizations in applying privacy and program legislation more consistently when planning, designing and delivering services to Albertans. When you take an information sharing approach to service design and delivery, it is helpful to adopt the Government of Alberta's Information Sharing Vision and Guiding Principles for social-based services. Doing so will help you understand how to balance a program area's need for information with the confidentiality, privacy and security requirements set out in legislation.

Begin with the end in mind to clearly define the purpose and outcomes the information sharing approach will assist in achieving. Use the vision and principles as touchstones to validate the purpose and outcomes. Describe what success will look like in order to understand when the outcomes have been realized.

### Alberta's Information Sharing Vision

Information sharing will improve service delivery to Albertans through increased collaboration across the Government of Alberta and service delivery partners.

## Alberta's Information Sharing Guiding Principles

- A citizen-centred focus for service design and delivery.
- Information sharing facilitates more comprehensive, coordinated or integrated service delivery as well as planning, monitoring and evaluation, enabling shared case planning without compromising privacy.
- Information is an asset to be managed effectively and efficiently.
- Information is shared as appropriate and authorized across the Government of Alberta and with external organizations to support effectiveness and efficiency.
- Risks associated with sharing information are acknowledged and managed within a culture that encourages information sharing while maintaining respect for privacy.
- Accountability for information management is in place and understood by all parties.
- Information is managed transparently in cross-ministry initiatives and relationships.
- Privacy principles are built into service design and delivery.



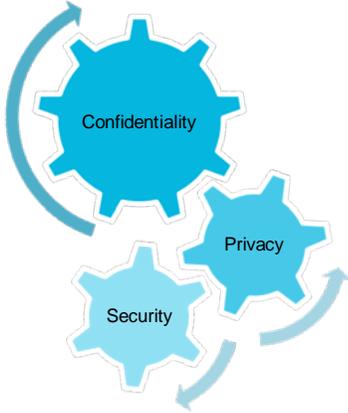
There are different provincial and federal privacy laws that govern the collection, use and disclosure of personal and/or health information needed to deliver, monitor, evaluate and audit programs and services. As you and your partner organizations plan, design, deliver and sustain a program or service, information requirements will vary. The expertise and delegated decision-making authority will also change throughout the process, making it essential to determine your legal authority to collect, use or disclose information.

Alberta's *Freedom of Information and Protection of Privacy Act* (FOIP) applies to **public bodies** and the *Health Information Act* (HIA) applies to **custodians** and their **affiliates**. Alberta's *Personal Information Protection Act* (PIPA) applies to private sector organizations and – in a significantly limited capacity – to **non-profit organizations**. Determining when PIPA applies and how it interacts with other privacy legislation can be challenging, but it is imperative that each organization understands their legal authority to share information prior to designing a program or service.

Finally, some service providers, such as federal correctional facilities, may be subject to federal legislation such as the *Privacy Act*

Legal authority is generally derived from legislation. In some situations, a public body such as an Alberta government ministry may extend its authority to service providers through a contract or agreement. This contract relationship provides authority to use and share an individual's personal information as needed to fulfill the contractual requirements.

You and your partner organizations must comply with applicable legislation by considering your responsibilities and duties to uphold the confidentiality, privacy and security rights of individuals.



**Confidentiality** refers to the duty to protect information that has been entrusted to organizations by the individuals they provide services to.

**Privacy** is about an individual’s control over the collection, use, and disclosure of information that relates to that person.

**Security** refers to the controls implemented to safeguard an individual’s information from unauthorized access, use, and disclosure.

<p><b>The <i>Freedom of Information and Protection of Privacy Act (FOIP - Alberta)</i></b></p> <ul style="list-style-type: none"> <li>➤ Applies to information that is in the custody or control of public bodies in Alberta</li> <li>➤ Strikes a balance between the public’s right to know and an individual’s right to privacy</li> <li>➤ Protects privacy by setting controls in which a public body may collect, use or disclose personal information</li> <li>➤ Allows individuals with the right to access their own information</li> <li>➤ Provides a right of access to information in the custody or control of a public body</li> </ul>	<p><i>Provincial privacy laws are subject to oversight by the Information and Privacy Commissioner of Alberta</i></p>
<p><b><i>Health Information Act (HIA - Alberta)</i></b></p> <ul style="list-style-type: none"> <li>➤ Applies to health records in the custody or control of custodians, as defined in the Act and Regulation</li> <li>➤ Enables health information to be shared and accessed, where appropriate, to provide health services and to manage the health system</li> <li>➤ Allows individuals with the right to access health information about themselves</li> </ul>	
<p><b><i>Personal Information Protection Act (PIPA - Alberta)</i></b></p> <ul style="list-style-type: none"> <li>➤ Applies to private sector organizations, to govern the means by which they collect, use, or disclose personal information</li> <li>➤ Applies to non-profit organizations when engaging in a commercial activity</li> <li>➤ Recognizes both the right of an individual to access their personal information, and the needs of the organization</li> </ul>	
<p><b>Privacy Act (Canada)</b></p> <ul style="list-style-type: none"> <li>➤ Applies to federal government institutions, as identified in the schedule</li> <li>➤ Applies to all personal information the federal government collects, uses and discloses about individuals or federal employees</li> <li>➤ Relates to an individual’s right to access and correct information the Government of Canada holds about them</li> </ul>	<p><i>Federal privacy laws are subject to oversight by the Privacy Commissioner of Canada</i></p>



### Governance

Governance guides the way organizations will work together on an initiative to reach an end result. It considers:

- organizational structure;
- roles and responsibilities;
- authority;
- criteria for decision-making; as well as
- a process for dispute resolution.

When taking an information sharing approach to service design and delivery, subject matter expertise must come from information management, privacy and security perspectives. You and your partner organizations should each select a designated individual with delegated authority to make decisions that will advance the work. Decision-making has to consider the whole, and not be made from only an internal, organizational or individualistic perspective. New or different processes may need to be developed and supported for effective governance in a cross-ministry or cross-organizational initiative.



### Risk Management

Risks may occur when an Albertan's personal or health information is collected, used and disclosed within and between partner organizations. Those risks must be mitigated and managed.

When designing and delivering a program or service, you and your partner organizations must first identify and understand the benefits and risks of sharing or not sharing information. You must agree on effective information sharing practices that support taking considered risks to provide an Albertan with consistent, seamless access to the supports they require, when they are needed.



### Program Controls

Information sharing program controls should be established through policies that will ensure a program or service is delivered in a collaborative, coordinated or integrated manner to meet desired outcomes.

Partner organizations need to develop information sharing policies that address key confidentiality, privacy and security practices including:

- identifying the authority to collect, use, disclose and retain information;
- providing notification;
- using consent to disclose (where required);
- returning an individual's personal or health information through informal or formal channels;
- establishing information security controls (technical, physical, administrative), and
- offering competency-based training.



### Performance

A performance management plan will enable you and your partner organizations to measure, evaluate and continuously improve the services you develop using the Information Sharing Approach. The plan should include performance goals, indicators and reporting standards that facilitate ongoing quality assurance. It will help you manage and improve **information governance** and accountability, policies, practices, processes and systems.



### Beyond Implementation

Successfully operationalizing and sustaining a service grounded in the Information Sharing Approach will happen by changing organizational cultures and shifting policies to practice. You and your partner organizations will need the following strategic and tactical plans to achieve desired outcomes:

- a change management plan;
- a communication plan;
- training and education for **employees** who collect, use and/or disclose an Albertan's personal or health information;
- knowledge mobilization processes and activities; and
- succession management and knowledge transfer programs.

## Information Sharing Approach - Template

Information Sharing Approach – Template		
Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.		
Approach Elements	Information Considerations	Information Sharing Best Practices
 <ul style="list-style-type: none"> <li>• <b>Vision</b></li> <li>• <b>Principles</b></li> <li>• <b>Purpose</b></li> <li>• <b>Outcomes</b></li> </ul>	<p>Who needs to be involved in developing the program or service?</p> <p>How will partner organizations work together? Have you considered a performance management process?</p> <p>Has the Alberta government's information sharing vision and principles been adopted?</p> <p>Does the purpose of the program or service align with and support the Alberta government's information sharing vision and principles?</p> <p>What outcomes will the program or service achieve?</p> <p>Do the outcomes align with the vision, principles and purpose?</p> <p>How will partner organizations know when outcomes are realized?</p>	<p>Align the purpose of the service with the information sharing vision and principles.</p> <p>This will guide the organizations in working together.</p>

## Information Sharing Approach – Template

Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.

Approach Elements	Information Considerations	Information Sharing Best Practices
<p><b>Setting the Direction</b></p> <p><b>Drafting Notes:</b></p>		
	<p>Which privacy legislation applies to each partner organization?</p> <p>What legal authority will support the flow of information?</p>	<p>Complete a comprehensive legal analysis throughout the development process to address information consideration questions.</p>
<p><b>Legislation Drafting</b></p> <p><b>Notes:</b></p>		

## Information Sharing Approach – Template

Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.

Approach Elements	Information Considerations	Information Sharing Best Practices
 <p><b>Governance</b></p>	<p>Who are the decision-makers and subject matter experts (SMEs) that can contribute to the development of the program or service?</p> <p>Who is in a position and has the authority to make the necessary decisions for each organization?</p> <p>Are partner organizations clear about their representatives' roles and responsibilities?</p> <p>Are partners clear about their organization's responsibilities?</p> <p>Do the governance mandate, structure and tools support efficient work flow and decision-making?</p> <p>Is there a process for resolving conflict?</p>	<p>Establish a governance structure to provide a process for decision-making, policy approval and implementation.</p> <p>Demonstrate accountability and transparency through clearly defined roles and responsibilities.</p> <p>Ensure partner organizations are represented by individuals with delegated authority to make decisions that will advance the work. Subject matter expertise must come from an information privacy, security and management perspective.</p> <p>Use tools such as terms of reference, protocols, approaches or agreements to support governance.</p>
<p><b>Governance Drafting Notes:</b></p>		

## Information Sharing Approach – Template

Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.

Approach Elements	Information Considerations	Information Sharing Best Practices
 <p><b>Risk Management</b></p>	<p>How does an Albertan benefit when information is shared appropriately and effectively?</p> <p>How do the partner organizations benefit when information is shared appropriately and effectively?</p> <p>What can jeopardize an Albertan’s personal or health information when it is collected used and disclosed within and between organizations?</p> <p>Does the governance for the program or service address risk mitigation and management?</p> <p>What are the most effective practices to allow partners to take controlled and considered measures to share information appropriately within and between organizations?</p> <p>Have health and safety issues been considered and assessed? Can they be mitigated by sharing personal and health information?</p>	<p>Manage risk in a way that is shared and supported by all partners.</p> <p>Ensure a process is in place to regularly review and evaluate information sharing initiatives.</p> <p>Address and support risk management through governance and policy controls. This strengthens accountability.</p> <p>Have a team of subject matter experts complete Privacy Impact Assessments (PIAs). Subject matter experts should include privacy, security, legal, program and information technology.</p> <p>When a PIA is completed for an Information Sharing Approach that supports service design and delivery, one overarching PIA is submitted.</p> <p><b>Note:</b> If the program or service will require the collection, use or disclosure of an individual’s health information, the HIA stipulates that a PIA must be completed and submitted to the Office of the Information and Privacy Commissioner prior to implementation.</p> <p>See <b>Privacy Impact Assessment</b> entry in Glossary for more information.</p>

## Information Sharing Approach – Template

Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.

Approach Elements	Information Considerations	Information Sharing Best Practices
<p><b>Risk Management Drafting Notes:</b></p>		
 <p><b>Program Controls</b></p>	<p>Do information sharing policies address key privacy, confidentiality and security practices including:</p> <ul style="list-style-type: none"> <li>• the authority to collect, use, disclose and retain information;</li> <li>• providing notification;</li> <li>• using consent to disclose (where required);</li> <li>• returning an individual's personal or health information through informal or formal channels;</li> <li>• establishing information security controls (technical, physical, administrative); and</li> <li>• offering competency-based training?</li> </ul> <p>Do information sharing policies, procedures and practices:</p> <ul style="list-style-type: none"> <li>• comply with relevant legislation;</li> <li>• support collaborative, coordinated or integrated</li> </ul>	<p>Align information policies, procedures and practices across the partner organizations.</p> <p>Align training requirements and ensure they are supported across partner organizations.</p>

## Information Sharing Approach – Template

Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.

Approach Elements	Information Considerations	Information Sharing Best Practices
	<p>service delivery and ensure the service meets its targeted goals, objectives and outcomes;</p> <ul style="list-style-type: none"> <li>align across partner organizations?</li> </ul>	
<p><b>Program Controls</b> <b>Drafting Notes:</b></p>		
 <p><b>Performance</b></p>	<p>Does the performance management plan for the program or service include performance goals, indicators and reporting standards that address information sharing and facilitate ongoing quality assurance?</p> <p>Will the plan help partners manage and improve information sharing governance and accountability, policies, practices, processes and systems?</p>	<p>Ensure shared performance measurements point to measurable outcomes.</p>

Information Sharing Approach – Template		
Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.		
Approach Elements	Information Considerations	Information Sharing Best Practices
Performance Drafting Notes:		
	<p>Is there a change management plan to help operationalize and sustain information sharing that supports program or service delivery?</p> <p>Is there a communication plan with tools and messaging to build awareness and understanding of information sharing, while supporting issues and change management?</p> <p>Will employees need education or training to understand how to share information appropriately? If so, what is needed?</p> <p>Are there any processes to increase information use and manage knowledge?</p> <p>Have succession management and knowledge transfer programs been established?</p>	<p>Develop governance plans that establish leadership, oversight and monitoring.</p> <p>Improve decision-making by allowing access to knowledge and collective expertise.</p> <p>Ensure that knowledge management and knowledge mobilization practices support all partner organizations.</p> <p>Have processes and activities in place to disseminate knowledge to the right people at the right time.</p>

### Information Sharing Approach – Template

Work through the seven elements to understand the information sharing environment and requirements that will effectively support ongoing service design and delivery.

Approach Elements	Information Considerations	Information Sharing Best Practices
<b>Beyond Implementation Drafting Notes:</b>		

## Glossary

### Affiliate

An affiliate is an individual or organization that is employed by, or performs a service for, a custodian. This includes contractors, volunteers, students, and/or appointees of the custodian and information managers. Refer to the HIA for a complete definition.

### Approach

An approach is a set of principles and goals that form the basis for setting direction, decision making, and guidelines; to give overall direction to planning, development and implementation of a program or service. This includes ongoing monitoring and evaluation of the program or service.

### Collaborative or Coordinated Service Delivery

Service delivery approaches that involve the coordination of services across multiple organizations with the shared goal of providing consistent and seamless services to Albertans.

Partner organizations have a shared understanding of their roles and responsibilities and share information in a timely and authorized way according to common operating principles such as guidelines, processes and best practices.

### Custodian

A custodian is an organization or a regulated health professional, as defined by the HIA or designated in the *Health Information Regulation*, who provides a health service. Examples include: Alberta Health, Alberta Health Services, nursing homes, pharmacists, nurses and physicians in their own private office/clinic. Refer to the HIA and the Regulation for a complete definition and list of designated custodians.

### Employee

An employee as defined under FOIP includes, in relation to a public body, a person who performs a service for the public body as an appointee, volunteer or student or under a contract or agency relationship with the public body.

### Health Information

Health information as defined in the HIA includes:

- Registration information<sup>1</sup> (examples include: personal health number, address, phone number, and health service eligibility information);
- Diagnostic, treatment and care information<sup>2</sup> (examples include: lab results, medical conditions, medical treatments, prescription information), and any other recorded information about an individual that is collected when a health service is provided to the individual.

## Information Governance

An established set of policies, procedures, processes and controls implemented to manage information within an organization that:

- Address common information needs once, thereby establishing best practices for all stakeholders.
- Promote best practices in order to identify and support effective solutions.

## Integrated Service Delivery

An approach that involves one or more organizations working closely together and sharing information based on more formalized and overarching governance, policies, systems and processes than collaborative and coordinated service delivery. This enables partner organizations to share information as appropriate and authorized, seamlessly providing Albertans with a continuum of preventative and responsive supports to meet their individual needs over time.

## Non-profit Organization

Non-profit organizations are independent legal entities – a corporate ‘person’ that exists separate and apart from its members or owners (shareholders). The inclusion of a non-profit organization under privacy legislation in Alberta is significantly limited under the Personal Information Protection Act (PIPA).

## Personal Information

Personal Information as defined in FOIP is recorded information about an identifiable individual, including, but not limited to:

- the individual’s name, home or business address, or home or business telephone number;
- the individual’s race, national or ethnic origin, color, or religious or political beliefs, or associations;
- the individual’s age, sex, marital status or family status;
- an identifying number, symbol or other particular assigned to the individual;
- the individual’s fingerprints, other biometric information, blood type, genetic information or inheritable characteristics;
- information about the individual’s health and health care history, including information about a physical or mental disability;

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<sup>1</sup> HIA s.1(1)(u)

<sup>2</sup> HIA s.1(1)(i)

- information about the individual's educational, financial, employment or criminal history, including criminal records where a pardon has been given;
- anyone else's opinion about the individual; and the individual's personal views or opinions, except if they are about someone else.

**Note:** When health information is shared with a public body and is no longer under the control of a custodian, it is defined as personal information under FOIP.

## Privacy Impact Assessment (PIA)

A risk management tool used to identify and evaluate the impact of a proposed change or practice may have on privacy. It assists in identifying areas of policy or alternative options that may address by mitigating or minimizing the risk. A PIA can be a helpful tool for proactively identifying the potential impacts a new process or practice may have on individuals or the organization.

**Note:** The HIA requires a custodian to submit a PIA to the Office of the Information and Privacy Commissioner for review and comment before implementing a new administrative practice or information system, or changing an existing practice or system, relating to the collection, use or disclosure of individually identifying health information. The PIA must describe how the proposed practice or system may affect the privacy of the individuals who are the subject of the information. PIAs are also required in other circumstances under the HIA.

## Public Body

Public body, as defined in FOIP, includes:

- a department, branch or office of the Government of Alberta;
- an agency, board, commission, corporation, office or other body designated as a public body in the regulations;
- the Executive Council Office;
- the office of a member of the Executive Council;
- the Legislative Assembly Office;
- the office of the Auditor General, the Ombudsman;
- the Chief Electoral Officer, the Ethics Commissioner, the Information and Privacy Commissioner, the Child and Youth Advocate or the Public Interest Commissioner; or
- a local public body<sup>3</sup>.

## Service Provider Organizations

Provide direct support to clients and work directly with stakeholders as it relates to the agency program mandate. Service providers include government organizations that deliver programs and services, health care organizations and contracted service provider agencies.

**Note:** The term 'Service Provider' is defined more narrowly under the *Children First Act*.

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<sup>3</sup> Includes an educational body, a health care body, or a local government body. *FOIP s.1(j)*

## Social-Based Services

A variety of social, personal and health care services that enable individuals and families to achieve meaningful outcomes that contribute to their wellbeing. Services may include government programs and services developed and/or provided through Government of Alberta ministries and their social-based service delivery partners and stakeholders.

## Stakeholder

Any person, group or organization in a position to affect or who are impacted by the approach. A stakeholder may not necessarily be involved or included in the decision-making process.