

6 Principles for Getting Information Sharing Right

Governments, public agencies, private organizations and the health sector may look to share citizens' personal or health information to deliver social programs, community safety, health care and education, and to conduct research. Information sharing initiatives can include data matching, joint access to databases, file duplication and other activities that enable more than one agency or organization to access, use and disclose personal information of citizens.

In many cases, information sharing initiatives reduce individual control of personal or health information. Complex, integrated information sharing initiatives with multiple participants are seldom transparent. It can be difficult for individuals to know what information has been collected and shared, for what purposes and to whom. Other impacts on the protection of privacy and access to information include inaccuracy, use of information for secondary purposes, risks to security, and potential for surveillance and discrimination.

As such, any information sharing initiative should thoroughly consider privacy and access to information implications and implement proper controls to minimize potential risks.

Here are six guiding principles for getting information sharing initiatives right.

1. 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.

Being open and transparent may include consultation with stakeholders, including the public, for significant initiatives.

2. 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 and each participant is subject to access and privacy laws.



3. Privacy Impact Assessments

Be proactive by undertaking privacy impact assessments early on to help identify possible privacy risks, with a view to preventing privacy breaches, including identifying ways to mitigate the risks.

4. Access and Correction

Respect citizens' rights by having a process for them to request and correct their personal or health information, and seek information about how their information is used and disclosed or shared.

5. Accountability

Accountability is the acceptance of responsibility for the personal or health information that is being collected, used and disclosed or shared. Remain accountable by implementing information sharing initiatives that will:

- Only share the least amount of information needed to satisfy the goals of the initiative.
- Have all reasonable and necessary safeguards in place.
- Establish and follow policies and procedures, risk assessment tools (such as privacy and access impact assessments), formal agreements and contracts, and privacy breach reporting protocols.
- Provide regular and ongoing training on these policies and procedures.
- Review and evaluate the information sharing initiative on a regular basis to ensure these principles and legislative requirements continue to be met.

6. Oversight

Consult with the Information and Privacy Commissioner to identify and address potential implications for the protection of privacy and access to information.

Additional Information

- *Government Information Sharing: Is Data Going Out of the Silos, Into the Mines?* by Stephanie Perrin, Jennifer Barrigar and Robert Gellman, Digital Discretion Inc. An independent research report commissioned by the Office of the Information and Privacy Commissioner of Alberta, January 2015. Retrieved from www.oipc.ab.ca/media/387468/report_government_information_sharing_jan2015.pdf.
- *Protecting and Promoting Canadians' Privacy and Access Rights in Information Sharing Initiatives*. A joint resolution of Canada's Information and Privacy Commissioners and Ombudspersons, January 2016. Retrieved from www.priv.gc.ca/en/opc-news/news-and-announcements/2016/an_160125/.
- *Becoming a Leader in Access and Privacy: Submission to the 2013 Government of Alberta FOIP Act Review*, Office of the Information and Privacy Commissioner of Alberta, July 2013, pp. 9-11. Retrieved from www.oipc.ab.ca/media/387731/Review-of-the-FOIP-Act-Becoming-a-Leader.pdf#page=12.