



PDD Program - Information Sharing Critical Considerations

Critical questions

Regional staff and service providers should ask themselves the following questions to assist in the decision-making process.

What legislation applies to me?

Each service provider may be subject to different legislation. A service provider who is under contract with the government must look at its contract to determine its accountability.

What authority do I have?

Determining your legal authority to collect, use, or disclose information is always the first consideration.

That legal authority may be extended through a contract to service providers.

Collection	Use	Disclosure	Consent for Disclosure
<p>Do I have authority to collect information?</p> <p>Do I have authority for indirect collection of information?</p> <p>Does the notification statement provided include sharing with service providers to support collaboration and coordination of services and planning?</p>	<p>Do I have authority to use the information collected to support collaboration, coordination and planning of services?</p>	<p>Do I have authority to share information to support collaboration and coordination of services and planning without consent?</p> <p>If there is no authority to disclose, do I really need to disclose the information to achieve the purpose?</p> <p>Can I disclose non-identifying information?</p>	<p>If identifying information is required and I do not have authority to disclose without consent, can I obtain consent from the individual?</p>

What is the minimum amount of information necessary?

Even if I have legislative authority or consent, am I only disclosing information that is necessary to enable the service providers to carry out the purpose in a reasonable manner?

When a custodian such as Alberta Health Services intends to collect, use or disclose health information, the custodian must consider in relation to the specific purpose of the collection, use or disclosure:

- first, whether aggregate information is adequate for the purpose;
- second, if aggregate information is not adequate, whether non-identifying health information will suffice; and
- if neither is adequate, only then may the custodian collect, use or disclose identifying health information.

Further, custodians are also required to only collect, use or disclose the amount of health information that is essential for the recipient to carry out the intended purpose and must consider any expressed wishes of the individual who is the subject matter of the information before health information is disclosed.



When is notification needed?

Providing notification is a legal requirement under Alberta's privacy laws.

Whenever you intend to collect and share an individual's personal or health information, you must notify the individual before you collect their information. Doing so:

- recognizes the individual's right to know and understand why their personal or health information is being collected and shared, and who to contact if they have questions
- facilitates partners coordinating multiple programs and services to meet the individual's needs
- supports accountability and transparency.