

Who is responsible for organizational privacy?

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What is privacy?

- Privacy is “the right to be left alone.”
- It is “freedom from intrusion or public attention.”
- Democratic basic human right.
- It “concerns the right to control the flow of information about ourselves, the right to fair, reasonable and confidential practices.”



Why care about privacy?

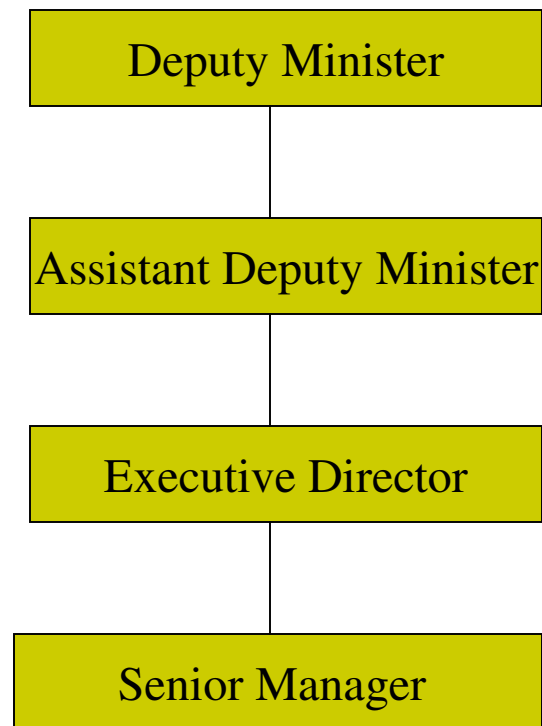
- ❑ Organizations are stewards of health information.
- ❑ Need to be committed to the protection of privacy and the confidentiality of health information.
- ❑ Flow of health information increases the risk to privacy.
- ❑ Legislation compels us to care about privacy!

Define terms within jurisdictions

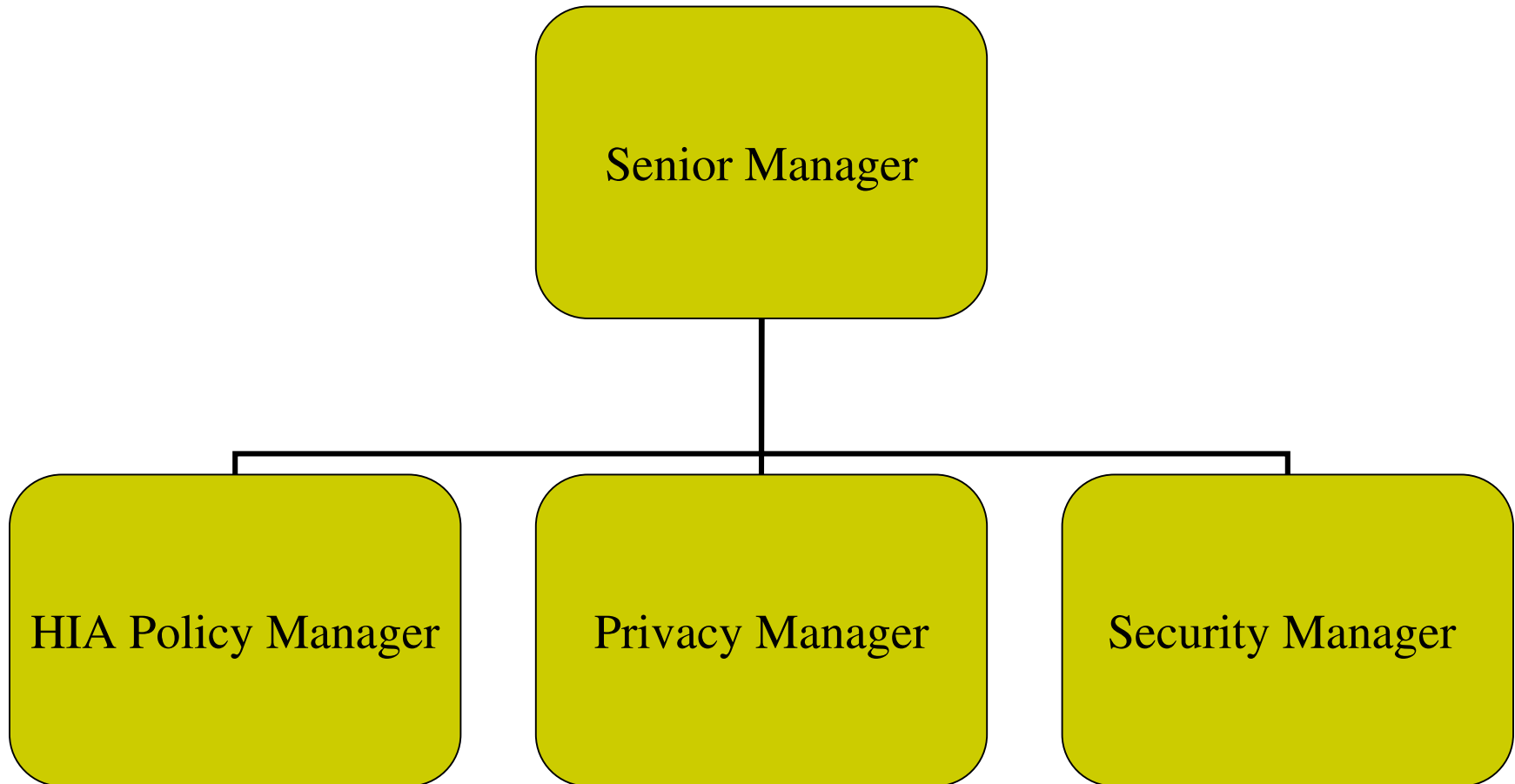
AB	MB	SK
Custodian	Trustee	Trustee
Affiliate	Trustee	Trustee
Responsible affiliate	Head of public body or delegate Privacy Officer	Head of gov't institution or local authority or delegate Designate of trustee



Organizational Structure



Unit Structure





Privacy Policies

- Collection
- Access
- Use
- Disclosure
- Protection
- Forms
- Collection notices
- Privacy Impact Assessments (PIAs)
- Research
- Contracting (IMAs)
- Notification
- Breaches
- Monitoring



Privacy Framework

1. Obtaining Commitment from Executive Committee
2. Delegating Responsibility
3. Privacy Vision
4. Taking Inventory of Current Practices



Privacy Vision (DRAFT)

- AHW will be a leader in health information privacy, comply with privacy principles and privacy legislation, and in doing so, further develop a standard of excellence which demonstrates integrity, transparency and accountability.



Privacy Framework Cont'd

5. Identifying Current Gaps and Risks at the Departmental and Branch/Unit Level
6. Mitigation Strategies for the Identified Gaps and Risks
7. Privacy Education
8. Continuous Privacy Compliance Monitoring (Review and Update)



Privacy Compliance

- Process of ongoing monitoring and training
- Ensures compliance with legislation, policies and procedures
- Process permanent, continual developing mechanism of direction and action
- Set review of all activities on regular cycle (including PIAs) beginning with self assessment followed by review by the Privacy Team



Who is responsible?

- Responsible affiliate
- “Privacy Team”
- Executive Committee
- All affiliates



What worked?

- ❑ Creating a “privacy team”.
- ❑ Centralizing the PIA process, creating “experts”.
- ❑ Treat your lawyers very well.
- ❑ Experts become recognized and respected even within large organizations.
- ❑ Open relationship with the OIPC.
- ❑ Being responsive to your customers.



What didn't?

- Privacy team taking on role of policing privacy issues.
- Not having direct line of communication between privacy and senior executive.
- Not establishing good links between policy, privacy and security.

QUESTIONS

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