

Collaborative Initiatives and Non-profit Organizations FAQ

What role do non-profit organizations play in the delivery of social-based services?	<p>Non-profit organizations play a key role in the delivery of culturally appropriate, collaborative services that support the health, education and wellbeing of Albertans.</p> <p>Non-profit organizations often do not work in isolation, rather they are frequently part of collaborative service clusters that can include government organizations, health care organizations, and others.</p>
What is a collaborative service cluster?	<p>Collaborative service clusters (CSCs) are broad coalitions of service providers who work in a coordinated manner to serve similar demographics with common needs. Organizations involved in CSCs typically require the same type of information to support similar outcomes.</p> <p>CSCs may include public bodies who are subject to the <i>Freedom of Information and Protection of Privacy Act</i> (FOIP), custodians who are subject to the <i>Health Information Act</i> (HIA), and non-profit organizations who are largely not subject to any privacy legislation but who may have one or more service delivery contracts with a public body or custodian.</p>
Are non-profit organizations subject to Alberta's privacy laws?	<p>Many non-profit organizations involved in social-based service delivery in Alberta are not subject to any privacy legislation, but in the context of collaborative initiatives most will have a service contract with a public body, custodian and/or both.</p> <p>This means that the public body or custodian's authority to collect, use or disclose information under Alberta's privacy legislation may be extended to the non-profit through a contract or agreement.</p> <p>A limited number of non-profit organizations fall under section 56 of the <i>Personal Information Protection Act</i> (PIPA)¹, meaning they are subject to the Act only when engaging in a commercial activity, which includes activities like: selling membership lists, operating a private school or early childhood development program, providing counselling services for a fee, or providing addictions support services for a fee.</p>
Is it problematic for non-profit organizations to be largely exempt from privacy legislation?	<p>It can be problematic for a number of reasons:</p> <ul style="list-style-type: none">• It may result in a lack of accountability and no recourse for individuals who feel their personal information has been handled improperly by a non-profit organization.• The Information and Privacy Commissioner of Alberta oversees compliance with Alberta's three privacy laws, but cannot investigate complaints about organizations that are not subject to any privacy law.• Privacy legislation enables information sharing.

¹ <https://servicealberta.ca/pipa-overview.cfm>

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	<ul style="list-style-type: none">• Organizations have responsibilities/duties under the privacy legislation they are subject to, including ensuring reasonable security measures are in place to protect personal or health information; this can make it difficult to work with non-profit organizations who are not subject to the same standards.• Lack of legal requirements / standards creates inconsistency in service delivery.
How do contractual relationships impact information sharing among partners?	<p>When a non-profit organization has a contractual relationship with a public body or custodian, information can be shared for the purpose(s) outlined in the contract(s). It is critical that contractual responsibilities are clearly articulated and understood in order to ensure information can be shared seamlessly.</p> <p>If there is no contractual relationship then consent to share information is likely required. This may take the form of consent-based 'warm handoffs' which involve sharing minimal client information, or strictly referrals from one organization to another with no information shared.</p> <p>The level of impact this can have on a collaborative initiative depends on whether a non-profit organization is a core or a peripheral partner.</p>
How do contractual relationships impact the information management practices of non-profit organizations?	<p>When a non-profit organization has a contractual relationship with a public body or custodian, the contract describes the information management responsibilities of the non-profit in relation to the purpose(s) set out in the contract.</p> <p>Sometimes a non-profit may have contracts with both a public body and a custodian at the same time. This means that information collected for purposes laid out in each contract may have to be managed differently.</p> <p>A good practice is to ensure contracts clearly state what responsibilities are extended to the non-profit organization, including for what purpose(s) the non-profit organization is authorized to collect, use and disclose information, and how they are expected to manage that information. Additionally, any limitations on information management should be clearly stated in the contract.</p>
How can collaborative initiatives ensure accountability when multiple organizations are involved?	<p>Collaborative initiatives can ensure the accountability of all partners by using a strong framework (such as the Information Sharing Approach) that considers the need for information sharing early in the development of the program or service.</p>

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	<p>Determine who needs to be involved in the development of the program and what their roles and responsibilities are.</p> <p>Each partner's information needs should be mapped out and each partner's authority to collect, use and disclose the information required for the program should be determined early in development.</p> <p>Determine whether legal authority to collect, use and disclose information will be extended to non-profit partners through a contract, or if a consent process will be used, or if a referral process will be used without any personal or health information shared.</p> <p>Establish strong administrative and operational policies and procedures, common tools, training and terminology that are used consistently across partners.</p>
<p>Who can I contact for help/support in setting up a collaborative initiative?</p>	<p>The Information Sharing Office can help:</p> <p>Tel: 780-638-1372 (toll free in Alberta: 310-0000) Email: CSS.CSinfosharing@gov.ab.ca Website: infosharing.alberta.ca</p>