

Fact Sheet: Common or Integrated Program or Service

The *Protection of Privacy Act* (POPA) has requirements regarding common or integrated programs or services.

Context

A “common or integrated program or service” (CIPS) is defined as a program or service that is planned, administered, delivered, managed, monitored or evaluated by a public body that is working collaboratively with one or more public bodies or another public body working on behalf of the public and/or one or more other public bodies.

There are various provisions in POPA that authorize public bodies to share personal information for various purposes. CIPS are one available option. Public bodies can choose to enter into a CIPS, or they may rely on other authorities in POPA that authorize them to share personal information. CIPS have some additional requirements that other sharing authorities in POPA do not have, such as the requirement to complete a PIA. As such, this purpose should only be used when no other POPA authority for collecting, using, or disclosing personal information is available or practical.

CIPS are limited to sharing personal information between public bodies and cannot be relied upon to share personal information with other organizations or governments.

The intent of a CIPS is to provide efficient and effective programs and services to better serve Albertans. They allow public bodies to partner to provide a program and service. Each CIPS may differ in terms of approach. Examples of CIPS could include a government department partnering with a municipality and health care body to deliver a social support program, a government department partnering with a school board on an education program or two municipalities delivering a shared community service.

PIA Requirement

According to the Protection of Privacy (Ministerial) Regulation, if a practice, program, project, or service is part of a common or integrated initiative, the public body must complete and submit a PIA to the Information and Privacy Commissioner under section 7.

Section 7(4)(b) requires that a privacy impact assessment be submitted to the Office of the Information and Privacy Commissioner (OIPC) for all

common or integrated programs or services. This can be a joint submission by the public bodies involved.

Each public body may also complete and submit addendums which address any unique collection, use or disclosure circumstances to the OIPC. The PIA and addendums need to adhere to the requirements stipulated in the Protection of Privacy Ministerial Regulation section 8.

For more information on PIA requirements refer to the Fact Sheet: Privacy Impact Assessment. Additional information on submitting a PIA to Alberta's Information and Privacy Commissioner can be found on their website.

Governance and Accountability

Strong governance and accountability is important for effective operation of a CIPS. Public bodies need to clearly define the governance structure and ensure it is clearly outlined each public body's responsibilities regarding the personal information involved and how they will comply with the POPA. This ensures that each participating public body plays an essential role in the program's operation and that the program could not function without their involvement.

As a best practice, public bodies should consider agreements between those involved in a CIPS to ensure clarity on roles and responsibilities.

Additional Resources

Protection of Privacy Ministerial Regulations

Protection of Privacy Act Guide

Fact Sheet: Privacy Impact Assessments