



SafeLink Alberta Privacy Statement

At SafeLink Alberta, we value authenticity, which includes demonstrating accountability through transparency, and justice, which includes dismantling systems of oppression. In addition to expressing these values within the services and support we provide, this also extends to the ways in which we collect, use, store, and disclose your personal and health information. We believe that everyone has a right to privacy, confidentiality, and informed consent, and we support these rights in how we collect and protect your information.

SafeLink Alberta operates in compliance with Alberta's privacy legislation and industry best practices throughout our organization. Health information collected through our clinical services is governed by the provisions of the Alberta Health Information Act (HIA). SafeLink Alberta does not collect personal or health information unless it relates directly to and is necessary for an operating program or activity of the organization. We require your explicit and informed consent wherever reasonable. Further, SafeLink Alberta supports the right of individuals to access, and request corrections to their personal and health information, subject to any specific restrictions in the legislation.

SafeLink Alberta acknowledges the importance of maintaining the privacy and trust of our stakeholders, including those who access our programs. We are committed to ensuring that your information is well protected.

Frequently Asked Questions Collection of Personal and Health Information

What is consent and why do I need to provide it?

Consent is your permission for team members at SafeLink Alberta to work with you and to provide you with any service. We also require your consent to collect personal identifying information, including health information, to use that information while working with you, and to share that information with others. Your consent ensures that you know what we are doing with your information and why we are doing it. It also allows you to make an informed choice before you share any information with us.

Apart from some specific emergency situations, we are unable to provide any services to you without your consent.

There are three main types of consent:

- **Explicit consent** – this means that you clearly and directly agree to something and that you give us your permission, either verbally, in writing, or in another direct manner. Saying "yes" or "I agree" to what we are sharing with you, or reading a form and signing your name, are forms of explicit consent.
 - For example, individuals wanting to access our systems navigation support are required to provide verbal or signed consent before a participant file is opened.
- **Implied consent** – this is an indirect type of consent. When you accept a service from us, your participation and acceptance of that service means that you are allowing us to access and share the information required to complete that service.
 - For example, attendees of our education events provide implied consent by registering for the event and providing us with your contact information.
- **Lawful consent** – this type of consent is outlined in certain pieces of legislation and gives us permission to share information in emergency situations. These particular situations are detailed for you when you consent to accessing SafeLink Alberta's services.
 - For example, if you are in emergent need of medical intervention.

While one or more types of consent may be valid in any one situation, SafeLink Alberta believes that you have the right to make informed decisions about the services that you receive, and we require your explicit consent wherever it is reasonable for us to obtain it from you.

What is considered personal identifying information?



Personal information is the identifying information provided directly from you and contains information specific to you. Health information may also be collected for those who access our clinical services. Health information is defined under the Alberta Health Information Act as diagnostic, treatment, or care information and protected as the most sensitive type of information.

We collect and store personal and health-related information that we consider to be important and necessary to provide you with support. For our participant registration purposes, this includes your name (which does not need to be your legal name, just one you remember), and your year of birth. As our organization only provides service navigation and support to members of key population groups under our mandate, your profile will also identify which group you are a part of. All additional identifying information we request (gender, pronouns, race/ethnicity, address, etc.) is optional and used to help us serve and support you. In addition, we are required to collect some personal and health-related information by groups that give us money to operate our programs, our funders.

All information collected is considered private and confidential and only those who need this information to provide you with support and services have access to this information. We are committed to collecting the least amount of information required to provide you with the services you request.

Can I access services anonymously?

For many of the services we offer at SafeLink Alberta, you do not need to provide identifying information. As noted above, the name provided for our registration purposes does not need to be your legal name, just one you will remember. This is to support continuity of care, and to ensure the information you provide to us is not confused with another participant.

We may require you to provide your legal name for particular services, such as referrals to income or housing support, or for certain health treatments. These circumstances will be discussed with you if or when they arise, and your explicit consent will be required.

Under what legal authority is SafeLink Alberta collecting personal identifying information?

SafeLink Alberta operates in compliance with Alberta's privacy legislation and industry best practices. Health information collected by our clinical services team is governed by the provisions of the Alberta Health Information Act (HIA). SafeLink Alberta does not collect personal or health information unless it relates directly to, and is necessary for, operating a program or activity of the organization. We require your explicit and informed consent wherever reasonable.

- **Health Information** – SafeLink Alberta has developed our privacy practices based on the requirements outlined in Alberta's Health Information Act (HIA). This legislation applies to the health information we collect, use, store, and disclose to provide our participants with clinical services.
 - The health information that we are collecting is needed to provide services as outlined under section 27(f) of the Health Information Act (HIA). It is collected under the authority of section 20(b) of the HIA. All personal information collected during the registration process, during your engagement with SafeLink Alberta, and for participation in any SafeLink Alberta program will be used to provide services and ensure a safe and secure environment for all our participants.
- **Registered Program Participant Information** – While not governed by legislation, SafeLink Alberta has developed our program privacy policies based on industry standards and best practices, incorporating principles from Alberta's *Freedom of Information and Protection of Privacy Act (FOIP)*, *Personal Information Protection Act*, *Health Information Act*, and the *Alberta College of Social Workers*. These principles apply to the personal and identifying information we collect, use, store, and disclose to provide our registered support services participants.
- **Employee, Student, and Volunteer Information** – Information is kept private and confidential and in accordance with Alberta's *Personal Information Protection Act (PIPA)* and industry best practices.
- **Donor Information** – Information is kept private and confidential and in accordance with the *Charitable Fundraising Act*.

Can I change my mind about my consent?



Yes! Whether you provide explicit or implied consent, you can always change your mind or “revoke your consent.” This is your legal right. Changing your consent, however, may impact our ability to provide you with service navigation or supports beyond basic needs and education. We encourage you to ask questions to understand the impacts of withdrawing your consent to ensure you are fully aware of how that decision may affect the services we are able to offer you.

Can I access the personal information that SafeLink Alberta stores about me?

Yes! Under most of Alberta and Canada’s privacy laws, you have the right to request access to the personal information any agency stores on you, or to authorize another person to do so on your behalf. At SafeLink Alberta, we support this right and welcome you to make such a request at any time. For small amounts of routine information, this request can be made verbally to any staff member or manager and can most likely be accommodated on the spot. For larger amounts of information, or more serious requests, we have a formal process which requires the request to be made in writing. This provides us with more time to ensure that your rights, and the rights of the agency, are respected.

In some rare cases and under specific circumstances or situations, such as where access to information may cause harm, SafeLink Alberta must or may refuse access to information. In these circumstances, partial access to health information may be provided.

At all times it is the right and responsibility of SafeLink Alberta to use reasonable means to confirm the identity of yourself or your authorized representative to ensure that someone unauthorized does not wrongfully access or influence your information.

How is my personal information used?

We primarily use your personal information for the purpose with which you provided it to us. Privacy laws also outline some limited circumstances where we may use this information for managing resources, measuring and evaluating our programs, funding reports, confirming your eligibility for a service or program, to support service provider/ practicum student trainings, and/or to comply with the Provincial and Federal laws related to the services and programs we provide you. For many of these uses, such as information used to measure or programs or for funding reports, the information will be formatted into collective summary with all personal identifying information removed.

How will my personal information be kept private and how will it be stored and protected?

SafeLink Alberta is committed to protecting the privacy, confidentiality, and security of personal and health information that is collected, used, stored, and disclosed throughout the organization. We are equally committed to ensuring that all employees, volunteers, and other persons acting on behalf of the Organization also uphold these obligations. We have a wide range of physical, technical, and administrative security and safety measures put into place to protect your information from loss, wrongful access, or abuse.

Registered participant and program information is securely stored in a web-based, electronic client management information system, operated by Bonterra Tech LLC called Apricot™. Any paper records are stored in triple lock locations with limited and controlled access.

Who will have access to my personal information?

Access to the Apricot™ database is limited to the SafeLink Alberta staff members who require access. Restrictions are set up within the system to ensure that staff are only able to access the files they need to have access to. Support and administrative personnel, such as managers, directors, and the Executive Director, also have access to the Apricot™ database to support and ensure data compliance, resource management, and funding applications. Health information is protected by an additional layer, with only those who need to know able to access.

How is my personal information shared within SafeLink Alberta? Will it be shared outside of SafeLink Alberta?

Inside SafeLink Alberta, your information is shared only with those who need access to provide you support or



to carry out the necessary support of the programs and services offered.

Outside of SafeLink Alberta, your information is shared with other agencies only when it relates to tasks or supportive services that you have requested and authorized us to share information with. We will only share your information outside of our organization with your explicit, written consent. In these situations, we will ask that you complete a Release of Information form, outlining the details of your consent.

There are situations where we may be legally required to share your information without your consent as part of our compliance with Provincial and Federal laws. The Health Information Act and The Public Health Act also identifies situations in which disclosure is mandatory or discretionary. In all cases, we will only disclose as much information as is essential for the purpose it is being disclosed or in accordance with legal requirements.

For health information, some of your health information collected through our nursing clinic may be deemed "prescribed health information" by law, and we may be required to make it accessible to authorized custodians via the Alberta Electronic Health Record (EHR) [commonly called Alberta Netcare]. Consideration of your expressed wishes will be measured when making your information accessible, and you can ask for some of your health information to be "masked". When authorized health service providers, like the nurses employed in our nursing clinic, access health information in Alberta Netcare it is considered a use of health information, not a disclosure.

These situations will be reviewed with you when you register as a program participant and consent to service to ensure you are able to make an informed decision before sharing your information.

How long is my personal information kept by SafeLink Alberta?

SafeLink Alberta will only keep your personal information for as long as necessary to ensure we are providing you with the services you have requested, with the minimum time being in alignment with what we are required to do by law. A participant file is considered "inactive" after a participant has not access services for two years. Program participant files are archived, stored, and destroyed in alignment with our agency's Records Retention and Destruction policy.

Who can I contact if I have questions or concerns about my personal information?

SafeLink Alberta is required by law to provide a contact point to answer your privacy questions or concerns. The SafeLink Alberta Privacy and Compliance Team can be reached by email at evaluations@safelinkalberta.ca, or by mail at 1944 10th Ave SW, Calgary, AB, T3C 0J8. Please address any messages to SafeLink Alberta – Privacy and Compliance Team.

This document was adapted, with consent, from CUPS, 2020, <https://www.cupscalgary.com/privacy-consent-faq>