Office of the Information and
Privacy Commissioner of Alberta

STRATEGIC
BUSINESS PLAN
2022-25

Priority 1: Modernizing regulatory mechanisms to support economic diversification and improve healthcare delivery and outcomes

The business case is building to modernize Alberta's access and privacy laws as more jurisdictions in Canada and globally enhance regulatory frameworks. This includes ensuring that our laws balance the access and privacy rights of Albertans with the need to use personal and health information to develop innovations and effectively provide services and deliver healthcare, with robust oversight and accountability mechanisms.

Outcome 1: Update Alberta's access to information and privacy laws

- We will continue calling for the modernization of Alberta's laws with respect to freedom of information and the protection of personal and health information. Modernization includes recognizing and addressing artificial intelligence, algorithmic transparency, automated decision-making, de-identification and data trusts, effective oversight, the importance of demonstrable accountability, and digitizing the freedom of information system.

  With respect to freedom of information, the COVID-19 pandemic has reinforced systemic issues. Changes must focus on making information available proactively and improving response times to build public trust in accountable and transparent government.

Outcome 2: Support mechanisms for privacy enhancing technologies and ethical assessments for big data initiatives

- We want to enable development of Alberta-based innovations by working with organizations to help ensure privacy and ethics are built into new technologies at the outset.

  We want to assist organizations in understanding that privacy enhancing technologies and ethical assessments can enable innovation. Building privacy, security and ethics into new projects is a necessary condition of innovation.

Priority 2: Enhancing internal processes to support our legislative mandate

The COVID-19 pandemic has exponentially increased the need for organizations to become more nimble in terms of alternative work arrangements. We are also seeing many organizations decide to have some staff work from home permanently on a go forward basis.

Our office is no different, and the COVID-19 pandemic has required us to move digital projects forward more quickly.

Outcome 1: Make digital records the default

- One of the goals in updating our records management program is to reduce reliance on paper records. For certain case types, the OIPC has deemed electronic records as the official record. We are also moving to official electronic records for administration files.

  This opportunity comes with many challenges, however, such as the need to continuously upgrade and improve systems. Information systems are often replaced or vendors stop providing security updates after a certain period time. These realities of digital environments require resources to maintain integrity and security of systems while ensuring continuity in operations for staff and stakeholders alike.

Outcome 2: Improve the ability to securely work from anywhere

- We were not alone in having to rapidly respond to new work from home arrangements as a result of the COVID-19 pandemic. We have introduced more digital ways to complete tasks while maintaining the integrity and security of information systems.

  We are taking the thoughtful steps we ask or require of regulated stakeholders in completing privacy and security risk assessments of new projects to ensure we have reasonable protections to limit network vulnerabilities.

Priority 3: Providing guidance to improve access to information and the protection of personal and health information

The COVID-19 pandemic and the various access and privacy issues, like providing proof of vaccination, highlighted the importance of our regulatory and education mandates to Albertans. We have updated or issued several resources and received many questions about access and privacy issues from employers and the public.

We recognize that providing guidance to improve access to information and the protection of personal and health information for Albertans is essential to our mandate.

Outcome 1: Reinforce the importance of privacy impact assessments and privacy management programs to help reduce the number of privacy breaches and security incidents occurring

- Ensuring privacy and security risk assessments are done at the outset of a project is one of the most proactive measures any public body, custodian or private sector organization can take to limit privacy and security incidents from occurring.

  We review PIAs to assist regulated stakeholders in understanding the steps required to ensure reasonable safeguards are in place to protect personal or health information.

- Canadian Commissioners were leaders in developing guidance on privacy management programs and demonstrating accountability.

  In addition to privacy management programs, we continue to advocate for enhanced security measures by publishing guidance to organizations in all sectors, including a self-assessment tool for securing personal information, and advisories on phishing, ransomware and securing web buckets.

Outcome 2: Enhance open, transparent and accountable government through regulatory work

- We will continue to advocate for the proper functioning of Alberta's freedom of information system. The COVID-19 pandemic has increased public expectations of their right to know why decisions are being made.

- We will continue to educate regulated stakeholders and the public through our mediation and investigation processes about what we can and cannot do.

- We will continue to issue binding orders that help regulated stakeholders determine how to properly respond to access to information requests.