Alberta's Information Sharing Strategy:

Supporting Human Services Delivery

Alberta Human Services

August 29, 2012

Acknowledgments

This project would not have been successful without the support and leadership of dedicated committees and staff. Their contributions to this project are acknowledged and greatly appreciated.

Assistant Deputy Ministers' Working Group

Bruce Anderson, Jim Bauer, Mark Brisson, Christine Couture, Brenda Lee Doyle, Mic Farrell, Karen Ferguson, Mark Hattori, Gord Johnston, Michele Kirchner, Cathryn Landreth, Stephen LeClair, Anthony Lemphers, Dean Lindquist, Chi Loo, Donna Ludvigsen, Denise Perret, Kurt Sandstrom, Q.C., Ken Shewchuk, Susan Taylor, Tom Thackeray, Donavon Young, Cameron Henry.

Advisory Committee

Heather Dechant, Sherry Desanko, Susan Fox, Lois Flynn, Betty Forster, Brian Frevel, Felix Fridman, Linda Gatzka, Heather Gilmet, Stephen Gauk, Lisa Hickman, Kelly Hillier, Sue Kessler, Farooq Khan, Gisela Kwok, Richard Marks, Di Nugent, Sandra Prokopiw, Carolann Regular, Wendy Robillard, Melissa Sadownik, Joanne Sasges, Sandra Shepitka-Boyle, Wilma Sisk, Stacey Supina, Erin Skinner, Hamblin Beharry.

Project Team

Carol Ann Kushlyk, Lana Lougheed, George Alvarez, Sheryl Savard, Karren Graham, Everett Speidel, Maureen Konrad, Trish McOrmond, Tessa Ford, Patti Giberson, Yonathan Sumamo.

Table of Contents

Section	Page
Executive Summary	4
Introduction	9
Mandate	9
Principles	9
Strategy Development and Consultation	10
Scope and Terminology	10
Relationship to Other Initiatives	11
Context	12
Information Sharing as an Ecosystem	12
Information Sharing Legislation in Alberta	12
Information Sharing Agreements	13
Case Studies	14
Types of Information	15
Barriers and Gaps	16
Culture	16
Consent	17
Standards	17
Access	17
Legislation	18
Ecosystem	18
Information Sharing in the Future	19
Moving Forward	20
Themes and Recommended Actions	
Governance and Leadership	21
Development and Training	21
Processes and Technology	22
Policy and Legislation	23
Change Management	23
Key Enablers	24
Resourcing	
Communications	
Evaluation	
Next Steps	25
Conclusion	26

Executive Summary

Information is the lifeblood of service delivery, planning and policy. If information isn't shared, it is difficult to ensure that people receive the services they require from different providers. Decisions get made without the full consideration of the needs of people or the opportunities available to them. Legitimate limits to sharing information exist, particularly around sensitive issues involving children, violence, abuse, criminal matters and health. However, much information can and should be shared to ensure the best decisions are made and Albertans are supported as fully as possible.

So the question becomes: How does the Government of Alberta (GoA) along with external organizations involved in delivering human services ensure that information flows efficiently and effectively to support the Albertans they serve?

Mandate

Premier Redford has mandated the Minister of Human Services to: *"Ensure information sharing practices within government and with service agencies support the best decisions possible in regard to the health, education and safety of children and families."*

Scope

The Information Sharing Strategy (ISS) addresses the mandate and focuses on the information sharing ecosystem for human services. The information sharing ecosystem is the larger domain in which information sharing occurs. It encompasses many areas within the GoA, other stakeholders and service delivery organizations, and the environment within which they work. That environment includes legislation, standards, policy approaches, business practices and information technology. The privacy legislation includes the *Freedom of Information and Protection of Privacy Act* (FOIP Act), the *Personal Information Protection Act* (PIPA), and the *Health Information Act* (HIA).

Strategy Development and Consultation

A cross-ministry Assistant Deputy Minister Sponsors Group and an Advisory Committee guided the development of the strategy. People from the GoA and external organizations participated in eleven focus groups across the province and several hundred others participated in online discussions. Insights were gathered from existing information sharing collaboratives in the human services sector. Workshops were held with advisory committee members and representatives of the focus groups to validate findings from the consultation streams. The advisory committee and others were then involved in discussions to determine ways to address gaps and build a strong information sharing ecosystem.

Relationship to Other Initiatives

The ISS supports the success of other government initiatives, including the Social Policy Framework, Early Childhood Development, Primary Health Care, Education's Regional Collaborative Service Delivery Initiative and the Alberta Public Service's Reaching Our Full Potential Initiative. The Strategy builds on related work, including the FOIP review, the GoA Open Data/Open Government Initiative and the Information Sharing Framework being developed by the GoA's Knowledge and Data Sharing Committee.

Barriers and Gaps

During the consultations, people talked about a risk averse culture and fear of the consequences of improperly sharing information. They identified an inability to appropriately assess and manage risk, understand the rules around sharing information, get clear direction and obtain training. The use of consent was identified as another barrier that occurred when programs had different requirements and more than one consent form for shared or similar services. It was also noted that consent was being sought when not legally required, another symptom of a risk averse culture.

The need for system wide standards was identified. Inconsistent standards created barriers and confusion; the lack of standards led to a patchwork of policies and practices. Access was another issue, including timeliness and the lack of compatible information technology platforms and standards around collecting, categorizing, storing and distributing information.

Differences between the HIA and the FOIP Act have caused confusion. There was a further perception that, notwithstanding the legal ability to share, it appeared that programs were sometimes advised to take a risk averse or "better safe than sorry" approach. Other barriers included: the lack of a common governance approach or business model across the information sharing ecosystem; limited capacity for compiling, analyzing and sharing information; the lack of a common client identifier or source for common client information; and the perceived need for individual information sharing agreements between programs and services, rather than a process guided by legislation, policy and standards.

Information Sharing in the Future

The Strategy provides an environment that supports the necessary sharing of personal and health information, where reasonably required. This environment enables collaborative or integrated service delivery while also protecting personal or public health and safety. The information sharing environment ensures that we can share information for better outcomes while also protecting personal privacy and confidentiality in a proportionate manner.

Elements of an optimized information sharing ecosystem emerged out of the consultations, including:

- A culture where expectations are clear throughout the human services sector, and relationships are characterized by openness, collaboration, shared responsibility and a willingness to share information; and staff feel safe, knowledgeable and supported.
- A system where consent is streamlined and standardized; sought only when legislatively required; and clearly understood by clients, including when being notified on how their information will be shared is sufficient.
- Standards are transparent, principle-based, widely shared and understood.
- Staff are clear on when, where and by whom information can be accessed by themselves and clients, and access is timely and supported by consistent documentation.
- Alberta's legislation governing information sharing is not in conflict and staff understand how to apply the legislation to their work.
- Alberta's information sharing ecosystem is guided by a common approach to the governance of information; information sharing agreements are used only when legally required.

Perhaps most importantly, participants identified the need for a client-focused and client centered approach, so that resources go to serving clients rather than duplicating information gathering and erecting or working around artificial barriers between services.

Moving Forward

The ISS sets out a series of actions under five strategic themes. The themes include changes in governance and leadership, development and training, processes and technology, legislation and policy and change management. There are other foundational steps that will enable all the themes.

1. **Governance and Leadership**

A governance structure that oversees the information sharing ecosystem is critical for ensuring consistency and leadership, as is leadership that is risk tolerant and encourages information sharing. Staff need to know they can and should share information and be supported by a culture that takes a problem solving and learning approach.

Recommended Actions:

- Develop a business model that addresses the ecosystem and sets out a governance structure.
- Build accountability into information sharing roles, responsibilities and expectations.
- Ensure consistency by working in alignment with other service delivery and policy initiatives.
- Promote and reinforce an information sharing culture.
- Provide sufficient resources to support information sharing.

2. **Development and Training**

Core information-sharing competencies need to be built across the GoA and external organizations. People need to understand what and with whom information can be shared and be able to build and maintain collaborative and knowledgeable relationships. Training is a critical aspect of the ISS and a first level of training should be mandatory for all employees.

Recommended Actions:

- Develop and implement a range of training modalities that support the development of core information sharing competencies across the human service delivery sector.
- Deliver consistent information and direction through communications and training.
- Foster a greater understanding of consent and its application through various mechanisms, including training, resource materials and collaborative practices.
- Ensure that standards and leading practices are widely disseminated.
- Build capacity to foster relationships that support information sharing and analysis.

3. Processes & Technology

Transparent, consistent processes are needed across the information sharing ecosystem, particularly in the area of standardized consent and notification forms and practices. Consistent information management practices and access controls also need to be applied to the classification and management of information and supported by information technology (IT).

Recommended Actions:

- Develop standardized consent and notification forms and processes.
- Ensure that information management practices are consistent and access controls are appropriate for managing all information.
- Develop a collaborative approach to information sharing in order to minimize the use of contracts as information management tools.
- Develop an IT Strategic Plan and IT framework that supports sharing and managing information across the information sharing ecosystem.

4. Legislation and Policy

System-wide information sharing policies and standards are required for all collaborating ministries and service delivery partners. A legal review by Alberta Justice and Solicitor General concluded that there are no substantial information sharing barriers under FOIP. Perception of barriers in legislation can be addressed through legal feedback, training and materials.

Recommended Actions:

- Develop system-wide information sharing policies and standards that can be used by all collaborating ministries and external organizations.
- Incorporate the principles set out in the ISS into the reviews of the HIA and FOIP.
- Analyze and address perceived information sharing barriers in legislation through mitigation processes such as legal feedback, training and materials.
- Develop a consistent approach to the application of legislative requirements.
- Conduct a risk analysis of information sharing and develop a policy on risk tolerance.
- Develop mechanisms that support a collaborative relationship between advisors to the GoA and external organizations in order to foster a common understanding of legislation, risk and policy relating to information sharing.

5. Change Management

Moving from the current to the desired state of information sharing will require vision and changes in culture, attitudes, relationships and business practices. Change will need to be championed throughout the human services sector by political leaders, management and staff.

Recommended Actions:

- Develop a change management strategy to support consistency and capacity.

Success in building an effective information sharing ecosystem will require attention to resourcing over the long term, consistent and persistent communications, and evaluation and monitoring to support the evolution the ISS and its continued relevance to meeting the needs of clients.

We develop and maintain quality relationships, partnerships and networks. We build on each other's knowledge and skills to create results that are greater than those that can be achieved by a single effort. We understand that being innovative requires a willingness to take risks. We support trying new approaches and view the results as opportunities for organizational learning.

Alberta Public Service: Reaching Our Full Potential

Introduction

The Government of Alberta (GoA) is executing an ambitious public policy agenda to change how government works to better reflect the needs of Albertans and today's realities. The ability to share information across the GoA and with external organizations also involved in human service delivery is fundamental to realizing this vision.

Information is the lifeblood of service delivery, planning and policy. Without information, children in poverty can't be identified; Families don't receive services; Seniors in need may not receive the Alberta Seniors Benefit. Without information sharing, it is difficult to ensure that people receive the services they require from different providers. If information isn't shared, decisions get made – or not made – without the full consideration of the needs of people or the opportunities available to them.

So the question becomes: How do the GoA and external organizations involved in delivering human services ensure that information flows efficiently and effectively to support the Albertans they serve?

Mandate

Premier Redford has mandated the Minister of Human Services to: *"Ensure information sharing practices within government and with service agencies support the best decisions possible in regard to the health, education, and safety of children and families."*

The Alberta Information Sharing Strategy: Supporting Human Service Delivery (ISS) is about realizing this mandate. Many Government of Alberta ministries and external organizations have common clients and overlapping mandates. Staff – wherever located - need to know how to confidently share information within the human services sector.

Being able to share information is a necessary part of building strong relationships, effective partnerships and collaborative approaches. It is fundamental to putting Albertans at the centre of the service delivery model so that it meets their needs, rather than having them shoehorn their needs into program delivery boxes. Information sharing also supports research and policy development, informs understanding of best practices, and enhances linkages between client profiles and client needs.

Despite its importance, real and perceived barriers to sharing personal and health information exist across ministries and with external organizations. Those barriers need to be overcome and dispelled.

Principles

The ISS will be guided by the following principles:

- Information is an asset to be managed efficiently and effectively.
- Information is shared when reasonable and necessary unless specifically prohibited.
- Client information is shared as appropriate across the GoA and with external organizations to support effectiveness and efficiency.
- Accountability for information management is in place and understood by all parties.

- Risk around sharing information is acknowledged and managed within the human services sector and the culture encourages information sharing while respecting privacy.
- Information is managed transparently by cross-ministry initiatives and relationships.

Strategy Development and Consultation

A cross-ministry Assistant Deputy Minister Sponsors Group and an Advisory Committee guided the development of the strategy. People from the GoA and external organizations participated in eleven focus groups conducted across the province and several hundred others discussed barriers using an online consultation tool. Information sharing collaboratives in the human services sector were interviewed for insights into their effectiveness. Workshops were conducted with advisory committee members and representatives of the focus groups to validate barriers and gaps in information sharing. Members of the advisory committee and others were then involved in discussions to determine ways to address gaps and build a strong information sharing ecosystem.

Scope and Terminology

Where the term ecosystem is used within this strategy, it refers to the information sharing ecosystem for human service delivery. Ecosystem is inclusive of human services providers who share clients and the environment within which they work. That environment includes legislation, standards, policy approaches, business practices and information technology environments.

The ecosystem encompasses many areas within the Government of Alberta, other governments, and service delivery organizations. These are described as GoA and external organizations throughout the ISS. Note: Where staff are referred to within the ISS, the reference includes staff within the GoA and external organizations.

The following are within the ecosystem; they provide services to Albertans, hold information or have responsibility for policies that impact services. All need to be involved as the strategy is implemented.

Table 1: Entities within Scope of the Human Services Information Sharing Ecosystem in Alberta

Government of Alberta Ministries

- Aboriginal Relations
- Health
- Education
- Enterprise & Advanced Education
- Human Services
- International & Intergovernmental Relations
- Justice & Solicitor General
- Municipal Affairs
- Service Alberta
- Treasury Board & Finance

Other Levels of Government

- Aboriginal communities
- Municipal (e.g., Police, Family and Community Support Services)
- Federal (e.g., RCMP)
- Other provinces

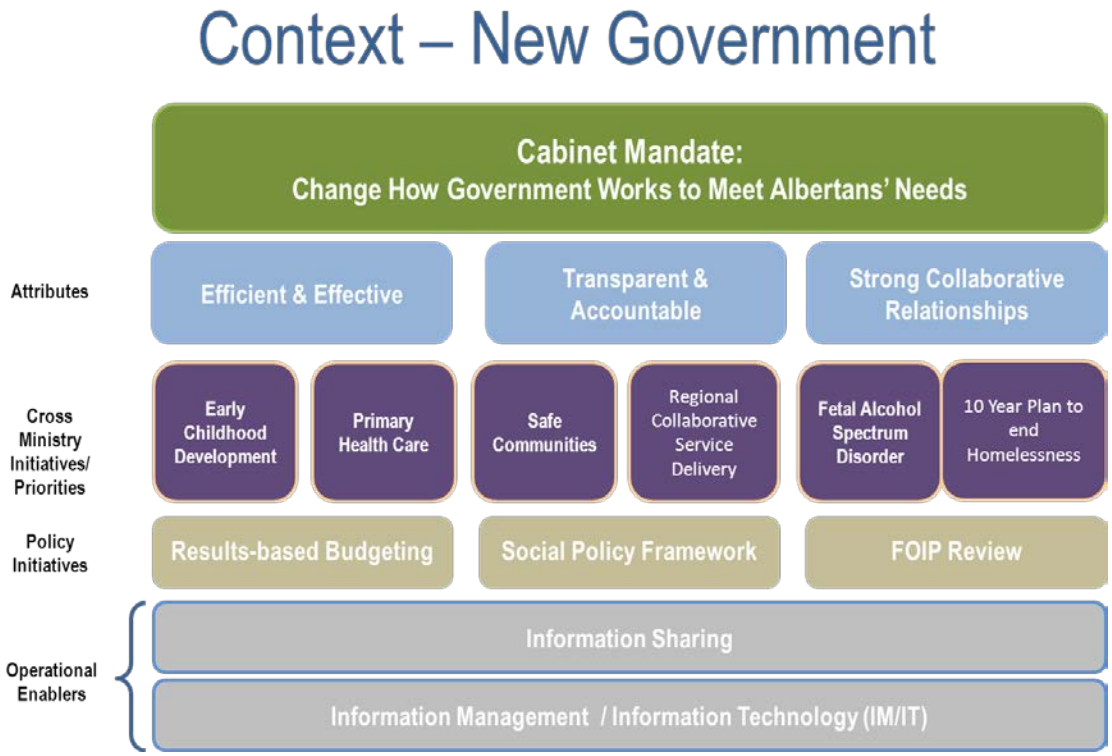
Service Delivery Organizations

- Health Services, Covenant Health
- School Authorities
- Delegated First Nation Agencies
- Child and Family Services Authorities
- Persons with Developmental Disabilities Boards
- Contracted Service Providers
- Social service agencies
- Contracted Long Term Care providers
- Agencies/individuals who work with in-scope partners in delivery of human services who are not contracted by or receive grants from same

Relationship to Other Initiatives

The ISS supports the success of other government initiatives, including the Social Policy Framework, Early Childhood Development, Primary Health Care, Education's Regional Collaborative Service Delivery Initiative and the Alberta Public Service's Reaching Our Full Potential initiative. The strategy builds on related work, including the *Freedom of Information and Protection of Privacy Act* review, the GoA Open Data/Open Government Initiative and the Information Sharing Framework being developed by the GoA's Knowledge and Data Sharing Committee.

Figure 1: Relationship to Other Initiatives



Alberta needs to move from an organizational culture that allows information sharing within the Government of Alberta and with external organizations, to a culture that expects and requires it to be shared where appropriate.

Context

Information sharing in Alberta's human services sector is guided by a web of legislation, regulation, policy and agreements that is both complex and straightforward. Legitimate limits to sharing information exist, particularly around sensitive issues involving children, violence, abuse, criminal matters, and health. However, much information can and should be shared to ensure the best decisions are made and Albertans are supported as fully as possible. Limits on information sharing should not be a barrier to collaborative relationships aimed at doing what's best for clients.

Information Sharing as an Ecosystem

Every Albertan accessing services is surrounded by an information sharing ecosystem. During the consultations, it became clear that people delivering human services are connected with a broad range of programs and organizations and that it is relatively easy to identify and map the relationships necessary for information sharing. It was also clear that staff are committed to doing the best job possible. Staff spoke of the need to share personal and health information and develop relationships in order to help clients achieve as much as they can. When staff have the opportunity to get to know people in other programs and organizations, they become more confident that the right decisions are being made for their common clients. They also become more confident that sharing information is the right thing to do for the client.

Information Sharing Legislation in Alberta

Alberta's legislation supports the necessary sharing of personal and health information, where reasonably required. This platform enables collaborative or integrated service delivery while also protecting personal or public health and safety. The legislation ensures that we can share information for better outcomes while also protecting personal privacy and confidentiality in a proportionate manner.

Alberta has a legislative framework that guides and facilitates the flow of information. The framework is structured around three pieces of legislation: the *Freedom of Information and Protection of Privacy Act* (FOIP Act) for public bodies, the *Personal Information Protection Act* (PIPA) for private organizations and not-for-profit organizations where they are engaged in commercial activities, and the *Health Information Act* (HIA) for custodians of health information.

The FOIP Act applies to virtually all information in the control or custody of a public body. Unless stated otherwise, the FOIP Act is the guiding statute and supersedes all other pieces of Alberta legislation. The HIA protects the privacy and confidentiality of health information, setting out how it is to be shared and accessed to provide health services and manage the health system.

The HIA paradigm is that information is not shared without client consent unless there is a specific authority that permits information sharing. The HIA generally operates within a defined scope. Those within the scope (e.g. custodians and affiliates, including the Health ministry) have greater leeway and ability to use and disclose information. Those outside it, including ministries other than Health, are

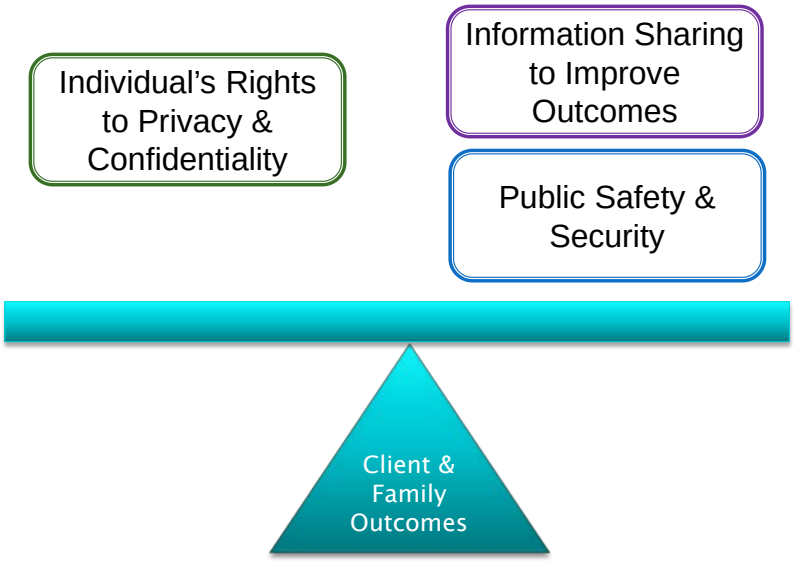
restricted in their ability to receive health information from custodians/affiliates, particularly individually identifying health information.

The needs of Albertans often include both health and social issues: staff guided by the HIA and those under FOIP need to share information. While there are provisions that allow information sharing between health information custodians and non-custodians, the HIA was viewed as a barrier by many staff during the consultations.

A further barrier can exist where non-profit organizations providing services are not covered by privacy legislation. As well, some pieces of legislation limit how information may be shared for a variety of legitimate reasons. At times federal legislation, such as the *Youth Criminal Justice Act*, takes priority over any provincial legislation and restricts the ability to share some information.

Overall, legislation currently allows for the desired future state. Legal restrictions on how information may be shared, outside of barriers between FOIP and HIA, are few in number and shouldn't be barriers to moving from the current information sharing environment to the desired state. They certainly shouldn't stand in the way of collaborative and productive working relationships that support clients even when some information can't be shared. Put another way, having to exercise professional judgment on what information to share is not a barrier in and of itself to work together on behalf of a client.

Figure 2 – Achieving Balance



Information Sharing Agreements

Ideally, information sharing agreements should only be used where legally required. However, they are sometimes used more broadly as ways to manage business relationships. Currently, there may be as many as 6,000 information sharing agreements and memoranda of understanding being managed

within the Government of Alberta. This places an onerous burden on administration, without taking into account the impact of reviewing and monitoring the contracts on legal and business functions.

Discussions were held with 11 joint service delivery initiatives in human services to determine factors for success. Some of these initiatives focus on services for children and share information between various combinations of Human Services, Education, and Health within the GoA and external organizations such as Alberta Health Services, Child and Family Service Authorities and school authorities. These include Student Health, Children and Youth with Complex Needs, Children's Care Services and Success in School.

Other initiatives are wholly within the GoA, such as the Alberta Supports Initiative and the Assured Income for the Severely Handicapped (AISH) /Persons with Developmental Disabilities (PDD) Information Sharing Pilot. Still others focus on the housing and social and mental health needs of clients, including Housing Works and the Shelter Option Strategy. Some involve policing along with services such as health, education and social services, including Multi Agency School Support Teams (MASST) and Police and Crisis Team (PACT) in Calgary and the Family Violence Police Advisory Committee.

Several areas described challenges in initially establishing a joint service delivery initiative, but found that by focusing on client needs and the positive outcomes, they were able to find ways to overcome barriers. They talked about training and building awareness as being critical. Most of them described their initiatives as being reliant on consent, even in situations where it probably wasn't required. Getting to the point where information sharing was possible was described in one initiative as hugely time consuming; this was echoed to some extent in others. Even with an agreement in place for the Alberta Supports Initiative, information sharing within the GoA was described as situation-by-situation, legally intensive and inefficient.

Overall, current initiatives are described as worthwhile and the right thing to do. They do take time to set up. Ensuring staff receive training is critical and they tend to be overly reliant on consent. At the end of the day, though, client satisfaction improves and outcomes are more timely and effective. Participants identified the need for a system-wide environment that depends less on narrowly defined contracts to achieve the desired outcomes. They also identified that many of the collaborative initiatives involve the same organizations, but each initiative had a different target population. While the target populations covered by the initiatives receive services that are better than the norm, other populations requiring human services that don't fit within one of these target populations don't benefit.

Case Studies

Information sharing strategies in the United Kingdom, Belgium, South Korea, and across Canada share a number of elements, including political commitment and management support. An examination of these different initiatives has informed the strategy.

- In Canada, provincial collaborative initiatives have information sharing requirements, including Employment Ontario and Alberta Supports Initiative. This approach to information sharing focuses on many small initiatives that are managed separately, with frequently shared partners but distinct or overlapping governance, leadership, training, resourcing and administrative processes. Most significant, service delivery gaps exist between various initiatives.

- Information sharing protocols that set out standards for government and service agencies are used in the UK. Senior management sign off on the protocols, which ensures a commitment to information sharing and that the legal authority to share information is in place. These protocols have been successful in creating robust information sharing environments. Like the UK, Alberta has identified information sharing as critical to better service delivery and in both jurisdictions there is strong political support.
- Belgium has created a centralized information bank with significant information architecture. The critical elements of success for Belgium's Crossroads Bank have been strong political leadership with a vision for a long term paradigm shift in how services are delivered to individuals. Belgium's information sharing architecture may be a long term goal that would require a significant financial investment to build, as well as the cooperation of both provincial and federal government bodies and external organizations. As such, it doesn't provide immediate prospects for improving service delivery in Alberta.
- South Korea has taken an administrative approach to information sharing that minimizes the need for citizens to provide information multiple times through an electronic government information sharing system. While it effectively addresses administrative processes in government to streamline services to citizens, it doesn't make service delivery the primary objective as set out in Alberta's mandate. Nonetheless, it provides insights into implementing broad-scale transformative practices at an administrative level.

Types of Information

Organizations in Alberta hold various types of information about individuals, including:

- Demographic information
- Health data, including medical diagnoses (physical and mental), addictions information, medications, current treatment, immunization information
- Cognitive, occupational therapy, psychological and psychiatric assessments
- Threat and risk assessments
- Anything required to determine program eligibility, including: income, criminal records, probation and recognizance orders, education level and performance, employment history, current status & future goals, living arrangements, family situation
- Information about current services
- Immigration status

While the issues of sharing personal information and sharing aggregate data for planning and research purposes are related, aggregate data is not the focus of this strategy. However, the ISS will benefit from this and other initiatives. It is also important to note that aggregate data uses individual data in ways that keep identities confidential or anonymized. This makes the management of individual important for aggregate data practices.

Barriers and Gaps

During the consultation process, a series of barriers, gaps and challenges was identified:

- Staff are often fearful of sharing information and err on the side of caution. This can lead to less information sharing even where there is no legal barrier.
- Information sharing is essential and often urgently needed, yet not always accessible.
- The information sharing ecosystem includes a wide range of organizations and can be complex.
- People and situations are complex and diverse; the kinds of information needed for effective service planning and case management are very broad.
- Information sharing rules are generally available in writing, but not always easy to understand or find.
- Practices around client consent and notification are complex, inconsistent and vary widely.
- Standards around how information is handled, including security and accountability, are inconsistent.
- Conflicts and inconsistencies exist in the application of the legal requirements of the HIA and the FOIP Act.

"The silos need to be broken down so that free communications can occur." Consultation participant.

The barriers and gaps were identified in six areas. These include culture, consent, standards, access, legislation and ecosystem.

Culture

Culture is sometimes defined as 'the way we do things around here.' It speaks to motivation and can either enhance or undermine confidence within organizations and systems. A culture that embraces information sharing is critical to moving forward.

During the consultations, people talked about the existence of a risk averse culture when it came to information sharing. They expressed fear of real or imagined negative consequences if they shared information. They were afraid of doing the wrong thing and of not having a good enough understanding of the legislation and policy requirements. They were concerned that they didn't know enough about programs and organizations with which they were being asked to share information.

Fear and risk aversion are often associated with silo cultures, where working with others outside of one's program or mandate is seen as leading to loss of authority, mandate or funding, rather than an opportunity to improve outcomes. As one participant said, "We build beaver dams when we should be building bridges."

Gaps impacting the information sharing culture were identified around the ability to appropriately assess and manage risk, understand the rules around sharing information, get clear direction and obtain training.

Consent

Consent should be used when people enrolling in a program or obtaining a service have the legal ability to ask that their information not be shared with all or some other organizations. If there is no legal requirement for obtaining consent, service providers should instead ensure that people are notified about how their information may be shared.

During the consultations, people identified consent as a barrier to sharing information between programs. This sometimes occurred when one partner required consent and the other didn't; organizations would not accept a consent form as valid; different forms or definitions of what constitutes consent were in place; and consent was for such a limited use that more than one consent form was required for shared or similar services. Others identified consent as a way of empowering clients; however, a clear notification process and communication is another way of achieving this objective.

It was also noted that consent is being sought when not legally required, another symptom of a risk-averse culture. Other barriers to sharing information were the differing consent provisions under FOIP and the HIA and an awareness of when exceptions to consent were permitted under the law, such as when a risk of imminent harm exists to the public or person.

"We need to do a better job of identifying those policies that get in the way and when there are simply perceptions of policy interference." Consultation participant.

Standards

The need for system wide standards for information sharing was identified as another gap. Standards guide the intentions, conduct and practices that support a cohesive information sharing environment. Inconsistent standards create barriers and confusion; the lack of standards leads to a patchwork of practices and policies. Types of standards include those in the areas of policies around definition of income and eligibility. They also include standards around how clients are identified, common terminology and definitions, data standards, issues around the format of information such as whether copies or originals are required, security standards, acceptable ways of transmitting and transporting information, records management and standardized forms.

"Look, if I'm calling Health because the abused child being apprehended presents as having a serious medical condition, I need the information right now and not in a week after I've been hounding substance abusing parents to get them to sign Health's consent."

It also isn't enough to have standards; they need to be broadly shared and understood. That requires resources for training, monitoring and access to support and assistance.

Access

Access in an information sharing environment is about program-to-program sharing. It addresses what the GoA and external organizations need to know about a person or

situation to determine what services are required and support their delivery. Access is also about timeliness and being able to quickly get information, particularly in a crisis. While client access to their own information without having to use FOIP processes was recognized as important, access for the purpose of this information sharing strategy deals with indirect information sharing between service delivery partners.

> **"People that are not employed by the government view the government as one entity, not several departments that do not or are not allowed to talk with or share information that would be for the greater good. The silos need to be broken down so that free communications can occur." Consultation participant.**

One of the identified barriers to access is the lack of compatible information technology platforms within the GoA and external organizations. Another barrier involved information management and the lack of standardized ways of collecting, categorizing, storing and distributing information.

Legislation

The legislative context was described earlier. Some of the barriers lie in the differing provisions required by the HIA and the FOIP Act. Other barriers lie in the way that the legislation is interpreted, particularly a perception of differences in advice given external to government and applications within the GoA. There is a further perception that, notwithstanding the legal ability to share, it appears that organizations are sometimes advised to take a risk averse or "better safe than sorry" approach. Complexity can result from differing provisions under the HIA and the FOIP Act; for example, the FOIP Act may authorize disclosure of information in a situation that the HIA would prohibit if the information was held under its provisions.

Ecosystem

> **"At the heart needs to be 'what is in the best interest of the person(s) being served…does sharing help, hurt or hinder?'" Consultation participant.**

As indicated in the section on scope and terminology, the information sharing ecosystem refers to the ministries, partners, other governments and organizations involved in providing human services who share clients and the environment within which they work. That environment includes legislation, standards, policy approaches, business practices and information technology environments. One of the barriers to information sharing was identified as the lack of a common governance approach or business model. Another was limited capacity for compiling, analyzing and sharing information. Lack of a common client identifier or source for common client information was also identified. Another barrier was the perceived need for individual information sharing agreements between programs and services, rather than a process guided by the legislation, policy and standards.

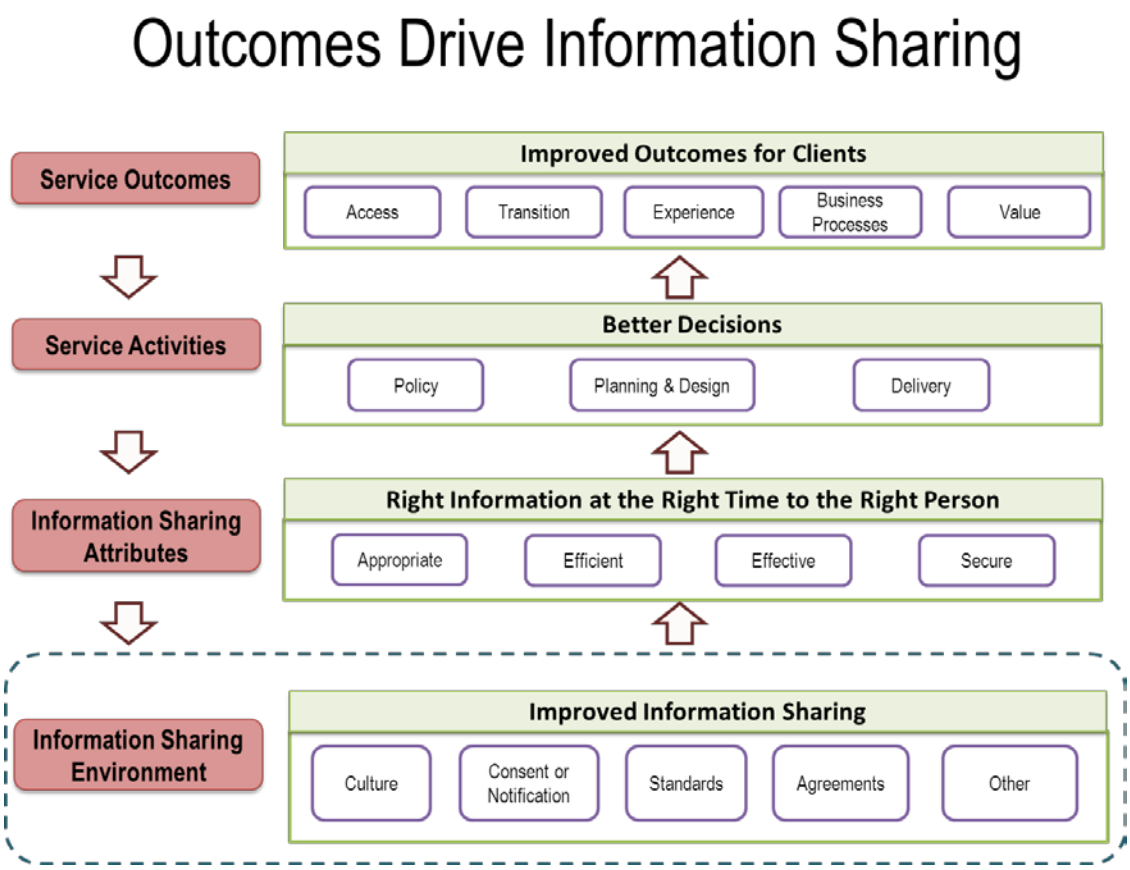
Information Sharing in the Future

Through the workshops involving Advisory Group members and focus group participants, elements of an optimized information sharing ecosystem emerged. They include:

- A culture where:
    - Expectations are clear to staff, clients, GoA and external organizations;
    - Relationships within the GoA and with external organizations are characterized by openness, collaboration, shared responsibility and a willingness to share information; and
    - Staff feel safe, knowledgeable and supported in sharing information to the fullest extent possible.
- A system where consent is:
    - Streamlined;
    - Standardized with system-wide processes in place;
    - Only sought when legislatively required; and
    - Clearly understood by clients, including when it is required and when they only are required to be notified on how their information will be shared.
- Standards are in place that are transparent, principle-based, widely shared and understood.
- Staff are clear on when, where and by whom information can be accessed by themselves and clients, and access is timely and supported by consistent documentation.
- Alberta's legislation governing information sharing is not in conflict and staff understand how it applies to the environment within which they work.
- Alberta's information sharing ecosystem is guided by a common approach to the governance of information across the GoA and external organizations; information sharing agreements are used only when legally required.

Perhaps most importantly, participants identified the need for a client-focused and client centered approach. Programs and services would share a common and holistic view of the client and his or her needs, so that resources go to serving clients rather than duplicating information gathering and erecting or working around artificial barriers between services.

Figure 3: Outcomes Driven Information Sharing



Moving Forward

Improved information sharing means the right information is available to the right people at the right time, resulting in better decisions and improved outcomes for Albertans. The strategy being recommended sets out a series of actions clustered under five strategic themes to achieve the mandate. These include changes in governance and leadership, development and training, processes and technology, legislation and policy, and change management. Together, these themes will help transform Alberta's information sharing ecosystem.

There are other foundational steps that will enable all the themes. Those include resourcing, communications, and evaluation.

Themes and Recommended Actions

As work was done to analyze the barriers and gaps, five thematic areas emerged. Each is a critical part of an overarching and effective information sharing ecosystem.

1. **Governance and Leadership**

   A governance structure that can oversee the information sharing ecosystem is critical for ensuring consistency and leadership. It will be an important factor in ensuring that information sharing supports and integrates with other service delivery and policy initiatives. One of its first tasks will be to develop a business model. Implementing this quickly will allow the ecosystem to develop capacity over the longer term.

   The need for leadership that models risk tolerance and encourages information sharing was also identified during the development of the strategy. Staff have to know that they have permission and will be supported in sharing information. They also need to know that when problems arise, a problem solving and learning approach is taken, not one that blames and reacts.

   Recommended Actions:

   - Develop a business model that addresses the information sharing ecosystem. Among other aspects, the business model will set out a governance structure.
   - Build accountability into information sharing roles, responsibilities and expectations.
   - Ensure consistency by working in alignment with other service delivery and policy initiatives.
   - Promote and reinforce an information sharing culture through modeling risk tolerance by leadership and supporting relationship building among staff, management, clients and service providers.
   - Provide sufficient resources (e.g. funds, materials and staffing) to support information sharing.

2. **Development and Training**

   Core information-sharing competencies need to be built across the GoA and external organizations. People need to understand what information can be shared and with whom it can be shared. They also need to be able to build and maintain relationships that are collaborative, trusting and knowledgeable of each other's mandates, roles and limits to information sharing.

Throughout consultations, training emerged as a critical aspect of moving from the current state of information sharing to the desired future state. As the strategy moves forward, that training will need to be delivered in a variety of ways, including face to face training, training among organizations with shared clients, and online just in time training and support. A first level of training may need to be mandatory for all employees.

Recommended Actions:

- Develop and implement a range of training modalities that support the development of core information sharing competencies across the human service delivery sector. The training would be available for front line staff, policy people and management within the GoA and external organizations.
- Deliver consistent information and direction through communications and training.
- Foster a greater understanding of consent and its application through various mechanisms, including training, resource materials and collaborative practices.
- Ensure that standards and leading practices are widely disseminated through training and communications strategies.
- Build capacity to foster relationships that support information sharing and analysis throughout the information sharing ecosystem.

3. **Processes & Technology**

Processes are the administrative tools and systems used to manage information sharing. Transparent, consistent processes are needed across the information sharing ecosystem, including health, particularly in the area of standardized consent and notification forms and practices.

Consistent information management practices and access controls also need to be applied to the classification and management of information. This includes timely access to sensitive information where required by legislation. Processes should also be robust enough that individual Information Sharing Agreements and Memoranda of Understanding are only used where legally required.

Good processes need to be supported by information technology (IT). An IT strategic plan for all service delivery partners is critical for improved information sharing.

Recommended Actions:

- Develop standardized consent and notification forms and processes to be used consistently across all human services sectors, including health.
- Ensure that information management practices are consistent and access controls are appropriate for managing all information. Those practices should ensure that access where appropriate is timely. As well, practices should reflect the sensitivity of information they are designed to manage.
- Develop a collaborative approach to information sharing in order to minimize the use of contracts as information management tools. Information Sharing Agreements and Memoranda of Understanding should only be used where legally required.
- Develop an IT Strategic Plan and IT framework that supports sharing and managing information across the information sharing ecosystem.

4. Legislation and Policy

System-wide information sharing policies and standards are required for all collaborating ministries and service delivery partners. These need to be supported by a common understanding and application of legislative requirements.

A legal review by Alberta Justice and Solicitor General concluded that there are no substantial information sharing barriers under FOIP. Perception of barriers in legislation can be addressed through legal feedback, training and materials.

Health information is dealt with under the HIA, which is undergoing a review to examine health information sharing. The GoA is also in the process of conducting a review of the FOIP Act.

Recommended Actions:

- Develop system-wide information sharing policies and standards that can be used by all collaborating ministries and external organizations within the information sharing ecosystem.
- Ensure that the principles set out in the ISS are incorporated into the reviews of the HIA and the FOIP Act.
- Analyze and address perceived information sharing barriers in legislation through mitigation processes such as legal feedback, training and materials.
- Develop a consistent approach to the application of legislative requirements aligned with standards and practices.
- Conduct a thorough risk analysis of information sharing and develop an overarching policy position on risk tolerance.
- Develop mechanisms that support a collaborative relationship between the advisors to both government and external organizations in order to foster a common understanding of legislation, risk and policy relating to information sharing.

5. Change Management

Moving from the current to the desired state of information sharing will require vision and changes in culture, attitudes, relationships and business practices. Change will need to be championed throughout the human services sector by political leaders, management and staff. Leaders for change need to be recruited and supported. Coaching, training, and role modeling will all be required.

Recommended Actions:

- Develop a change management strategy to support consistency and capacity. This change management strategy will be integrated and coordinated with other change management initiatives where appropriate, including Reaching Our Full Potential.

Key Enablers

Success in building an effective information sharing ecosystem will require attention to the following key enablers:

- **Resourcing**
  Developing a governance model, providing development and training opportunities, putting in place the information management and technology tools, etc., will all require resources – both human and financial. Support for the ISS must be made a priority and provided over the short and long term if it is going to succeed.

- **Communications**
  Communications was identified as essential to the successful implementation of all aspects of the strategy. This includes clear messages and information tailored to the needs of the range of audiences across the GoA and with external organizations. The approach will need to be consistent and persistent.

- **Evaluation**
  Successful management of the information sharing strategy requires ongoing and built-in monitoring and assessment to ensure that the strategy does what it was intended to do. Regular feedback from areas throughout the ecosystem will support its evolution and continued relevance to meeting the needs of clients.

Next Steps

Key actions in the time leading up to the end of 2012/2013 will include putting the business model and governance structure in place. Parallel to this will be work to implement the training and communications resources, including web based information and training. Critical factors to be addressed in the change management strategy will be identified, including the need to integrate with other change management initiatives within the GoA. Work will also be done to provide input to the reviews of the HIA and the FOIP Act.

During 2013/2014, further work will be done on training, particularly in conjunction with other collaborative initiatives such as the Service Delivery Transformation Initiative. Culture shift will be emphasized. This shift will leverage off change management activities, including the identification and support of change agents and champions across the human services sector. Further work will be done to identify and implement standards, rationalize consent and notification processes, and develop mechanisms to support collaborative relationships.

Conclusion

People come to the GoA and external organizations with needs that can often only be met by accessing a variety of services. Service providers often see only the service they can provide and have difficulty gaining a client view that encompasses all the factors at play. Yet without that client focus - the ability to see the services from a holistic perspective - it's difficult to ensure that the best decisions are being made. Information sharing is key to gaining that client focus.

Part of having an effective information sharing system is knowing when and how to share information. Staff delivering human services need to understand the information sharing ecosystem within which they work. Knowledge is key to having the confidence to understanding when and how much information to share with their peers who are working on behalf of the same client. Access to resources and support is critical when questions arise around information sharing.

A concerted effort needs to be made to ensure that Alberta's information sharing system is up to the challenge. Implementing Alberta's Information Sharing Strategy will require dedicated resources and a multi-year commitment. The task is important: The success of this strategy will support other initiatives and strategies across Alberta's human service delivery sector aimed at better delivering services to Albertans.