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ECONOMICS OF POLICING AND COMMUNITY SAFETY

Policy Makers' Dialogue on Privacy and Information Sharing

Workshop Report
January 2015



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Cat. No.: PS4-197/2015E-PDF
ISBN: 978-0-660-02669-5

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CONTEXT

New Models of Community Safety and Well-Being

In October 2014, Federal, Provincial and Territorial Ministers Responsible for Justice and Public Safety approved the Economics of Policing and Community Safety Shared Forward Agenda, a strategy for the future of policing in Canada. The actions of the Shared Forward Agenda are oriented around three pillars: 1) Efficiencies within Police Services; 2) New Models of Community Safety; and 3) Efficiencies within the Justice System. These pillars are supported by the foundational elements of engagement, research and information sharing.

The approval of the Shared Forward Agenda by Ministers signified a collective first step and an indication that the leadership and responsibility for further development and implementation of specific actions to improve policing in Canada will be shared amongst governments, and in partnership with the entire policing and public safety community. The Shared Forward Agenda is about cooperating collectively in those areas where it makes sense to do so, while respecting jurisdictional responsibilities for policing and adopting a comprehensive and holistic approach to public safety.

The workshop on privacy and information sharing sought to advance the objectives of the Economics of Policing and Community Safety Shared Forward Agenda Pillar 2: New Models of Community Safety. This workshop highlighted the benefits and challenges of sharing personal information between government institutions, local authorities, health and social service agencies when mobilizing resources to support individuals and families experiencing acutely elevated risks of harm. The expectation is that immediate intervention will help an individual, family or community by preventing situations from worsening to the point where more significant problems emerge and more formal interventions are required from police and social services (i.e. Children's Aid Society).

Drawing on the experiences of Saskatchewan and Ontario, the workshop generated discussion around the identification of best practices for collaboration and information sharing, while respecting privacy rules within new inter-disciplinary community safety and well-being models. The workshop brought together federal and provincial government

representatives who are familiar with inter-disciplinary community safety and well-being models, as well as those familiar with provincial privacy and information sharing legislation.

In summary, this workshop outlined a community development approach, the purpose of which was to have a conversation with agencies on how best to collaborate across disciplines and share relevant personal information in a safe and legal way to help to reduce elevated risk to individuals and families.

BACKGROUND

The Prince Albert, Saskatchewan Hub Model

In February 2011, a group of professionals in Prince Albert, Saskatchewan, initiated the province's first government-led model of a collaborative, risk-driven community safety model, known as the Hub. The Hub model was adapted from three concepts observed late in 2010 by a Saskatchewan study team during a study visit to Glasgow, Scotland. The three concepts are the following:

1. **The Scottish Concordat:** an agreement between the Government of Scotland and the municipal authorities.
2. **The Glasgow Community Safety Services:** now rebranded as Community Safety Glasgow, this company, jointly owned by the Glasgow City Council and the Scottish Police Authority, aims to work in collaboration with agencies and communities to address anti-social behaviour.¹
3. **Govanhill Operational Hub:** a test site for the Scottish Government's Equally Well initiative, in which local public services operate in a single shared location and provide a collective response to individuals who require multi-faceted support.²

The Hub model was adopted in Prince Albert, Saskatchewan to counteract the inefficiencies of the existing system of individual agency/institutional silo support for individuals and

¹ Community Safety Glasgow: About Us. Website: <http://www.saferglasgow.com/about-us.aspx>, Last accessed February 20, 2015.

² Hawkins, C., Egan, J. and Craig, P. (2011) *Partnership Approaches to Address Local Health Inequalities: Interim Evaluation of the Govanhill Equally Well Test-site*. Glasgow Centre for Population Health & Equally Well: Glasgow, Scotland.

families experiencing an acutely elevated risk of harm. Through a collaborative inter-disciplinary intervention, individual or family needs may be met efficiently and effectively, thereby reducing the level of acutely elevated risk.

The Hub is a form of community mobilization that brings together various social service resources to address the needs of high risk individuals within the community. In the case of Prince Albert, the social services involved include: Prince Albert Police Service, Saskatchewan Rivers Public School Division, Prince Albert Catholic School Division, Prince Albert Parkland Health Region, RCMP “F” Division, Saskatchewan Corrections, Saskatchewan Social Services, Prince Albert Fire Department and Prince Albert Grand Council. Twice weekly, this collective meets to identify situations of *acutely-elevated risk* (a defined threshold) and to determine which agencies’ support will help to lower the level of risk and prevent harm or further harm from occurring.

Data Collection

The Hub collects non-identifiable data from the individuals and families it seeks to help, including a list of risk factors, and details regarding age category, gender, originating agency, lead agency and assisting agencies. A Hub discussion number is assigned to each situation. This data provides for an evidence-based analysis of the risk of harm, as well as the potential root causes of risk, which are present in the community.

The Centre of Responsibility (COR), in support of the Hub, is a full-time centre for research and analysis of the root causes of social problems and the development of long term solutions to systemic issues. Data collected during Hub discussions provides an extraordinary opportunity to gain valuable insight into acutely elevated risk situations and resulting community trends.

Process

Hub discussions about situations of acutely elevated risk are centred around three main concepts:

Collaboration: the dynamics among social service professionals from various agencies who are working together toward a common goal.

Risk: factors that have the potential to result in harm to an individual, family, or community.

Interventions: efforts among participating social service professionals to support individuals, families, communities so the risks they face may be reduced.

The Hub defines *acutely elevated risk* as the presence of four conditions:

- significant interest to the community;
- high probability of harm occurring;
- severe intensity of harm; and
- multi-disciplinary nature of acutely elevated risk of harm.

To determine whether an individual or family meets the criteria for *acutely elevated risk*, and whether the situation, in turn, requires a collaborative intervention through the Hub, participating agencies go through a filter process. In addition to determining the possible role of the Hub, this filter process helps to protect the privacy interests of individuals and families experiencing elevated risk. The Four Filter Approach unfolds as follows:

Filter One: Originating agencies determine if the case is one of acutely elevated risk, and if so, whether the originating agency has exhausted all reasonable options to mitigate the risk and to unilaterally meet the individual or family's composite needs. This step occurs before any situation is brought to the Hub. If all options have been exhausted by the originating agency, the case proceeds to Filter Two and is introduced to the Hub table at the next available opportunity.

Filter Two: Originating agencies present their case and provide de-identified information regarding the individual or family's risk factors to all members of the Hub table. Hub participants then assess whether the risk factors identified place the situation at a level of acutely elevated risk, and if a collaborative intervention is appropriate.

Filter Three: Some basic and carefully limited identifiable information (e.g. name, address and age range) about the individual or family is shared on a need-to-know

basis. If feasible, consent will have been obtained by the originating agency from the individual or family directly. Where not feasible, due to the nature of the risk situation, such limited information is presented under the principles of implied consent and duty of care (see information on Ontario principles below). This limited information is shared at the Hub table in order for other agencies to determine whether services and supports are already being provided from their own organization. If services are not being provided, the agencies determine their possible role in a collaborative intervention that seeks to reduce the individual or family's acutely elevated level of risk. Agencies whose services are not required will desist from further participation. If adequate services are found to be already in place or available and the Hub table determines that a collaborative intervention is not required, the Hub dossier is closed.

Filter Four: Those agencies determined by the Hub table to be necessary to a collaborative intervention will meet separately, after the Hub meeting, to discuss and plan their multi-agency intervention. The case management policies of each participating agency govern the degree of information each agency shares with its Hub partners for purposes of planning, executing and following through on the intervention and any ongoing collaborative support. No further identifiable information will be reported back to the full Hub table, but the intervening agencies will report on the progress and results of their initial intervention(s) in a de-identified manner that uses only the Situation Number. The involved agencies will work toward developing and executing a strategy that responds to the immediate and pressing needs of the individual or family within a 24-48 hour timeframe. When the Hub table is satisfied that the client has been 'connected to services' and that 'acutely elevated risks' have been reduced to safely manageable levels, the dossier is closed at the Hub table.

One of the challenges that proponents of the Prince Albert Hub Model faced involved the participating agencies' varied interpretations of privacy legislation, which hampered information sharing between agencies and inhibited the community mobilization process. To examine perceived barriers to information sharing and to address this issue, the Saskatchewan Ministry of Justice led an initiative to establish the Information Sharing Issues

Working Group (ISIWG). In turn, the ISIWG developed the *Interim Information Sharing Guidelines*, which focus on information sharing in a community mobilization project like the Hub. The *Guidelines* are designed to assist service providers in understanding their privacy obligations and their compliance requirements under existing privacy legislation.

In November 2014, the Saskatchewan Information and Privacy Commissioner issued his investigation report on the Hub in Prince Albert, including a review of the Four Filter process. Some of the Commissioner's recommendations focused on the following issues:

- The 'need to know' and data minimization principles must be applied consistently. Records should only be kept by agencies that have a role to play in mitigating the situation and only to the extent needed to address the need.
- Only those with a need-to-know should remain in the room past the sharing of de-identified information at the Filter Two stage. Hub agencies should establish a need-to-know agreement, since it is now often the case that a particular agency's need-to-know only becomes clearly established at Filter Three.
- A standard referral form or template should be developed along with training, and a referral form should be mandatory for all cases brought to the Hub.
- Consent from the client needs to be the default; if consent is not obtained, the reasons justifying disclosure should be documented.

The Commissioner also recommended that when a review of access and privacy legislation occurs in the future, amendments should be made in order to clarify the rules for interagency information sharing, including a requirement that agencies enter into written information sharing agreements when they participate in common integrated program delivery. The complete text of the Commissioner's recommendations can be found in Appendix C, along with the response from the Saskatchewan Ministry of Justice accepting the recommendations.

Information Sharing in Ontario

In Ontario, information sharing is key to the success of collaborative, inter-disciplinary approaches to community safety and well-being that are being developed in communities across the province. To support this movement and to promote information sharing as a

critical component of risk-driven prevention initiatives, the Ontario Ministry of Community Safety and Correctional Services has been engaging with other provincial ministries along with federal, police, community partners to develop the *Community Safety and Well-Being Planning Framework*.

Throughout 2013, Ministry staff visited over 30 Ontario communities to learn about promising community safety and well-being programs and initiatives at the local level. These visits gathered information on what is working well, identified challenges associated with implementation and assessed areas in which further support from the government may be needed. The findings from these community engagement sessions included identified local successes and challenges related to information sharing, which are highlighted in the booklet [*Community Safety and Well-Being in Ontario: A Snapshot of Local Voices*](#), which was publicly released in November 2014 on the Government of Ontario website. They have also been used to inform the development of the Ontario *Community Safety and Well-Being Planning Framework*.

The objective of this Framework is to set the stage for collaborative and coordinated community safety and well-being service delivery. It encourages local, multi-disciplinary partnerships to respond to crime and complex social issues on a sustainable basis. Building on the strengths of Ontario communities, the Framework highlights the need to increase efforts to create an environment that supports meaningful collaboration, the sharing of information and expertise, and the implementation and evaluation of outcomes-based programs.

The Framework identifies four zones that are integral to holistic community safety and well-being planning: social development, prevention, risk mitigation, and emergency response. The first three zones are all preventative in nature, and focus on addressing the precursors and preconditions that create risk, preventing prevalent and ongoing risks within communities, and mitigating acute risk of harm or victimization for specific individuals. In contrast, the emergency response zone is enforcement-dominated and reactive, as opposed to preventative. While all four zones are necessary in order to plan effectively to enhance community safety and well-being, the Framework's emphasis on preventative strategies

recognizes that greater strides made toward preventing crime and harm can ultimately reduce the need for emergency response.

Critical to the success of the Framework is the refocusing of existing efforts and resources with regard to both strategy and impact. The three key areas of focus within the Framework are collaboration, information sharing and performance measurement. In each of the Framework's zones, planning is necessary to identify the entities that need to collaborate, the information they need to share in order to work together and the outcomes they are trying to achieve.

Situation Tables

The Saskatchewan Hub model is one example of a risk intervention approach underway in some Ontario communities. The Hub model became a stimulus for the Ontario Working Group on Collaborative, Risk-Driven Community Safety, a collaborative partnership comprised of various Ontario police services and their community partners that aims to develop and implement local risk-based community safety and well-being initiatives. The Ontario Working Group elected to rebrand the Saskatchewan Hub table model the 'Situation Table' in an effort to distinguish it from other existing combined service facilities in Ontario that also use the "hub" label but that are unrelated to community risk intervention efforts.

Similar to Saskatchewan's Hub, the goal of the Situation Table in Ontario is to address community safety and well-being issues that have been assessed by multiple agencies and that conform to the definition of acutely elevated risk. The Situation Table seeks to develop evidence-based strategies to resolve such issues as expediently as possible, typically within 24 to 48 hours.

All individuals involved in a Situation Table must adhere to privacy principles, and some agencies require their members to sign a memorandum of understanding that outlines these principles. Situation Tables have confidentiality agreements in place for all members, as well as for representatives from other agencies who may request to observe the meetings for learning purposes and to assess their organizational fit.

Information Sharing

One of the earliest hurdles encountered by the Ontario Situation Tables concerned the capacity to share individuals' confidential information amongst participating agencies. A multi-agency study³ that examined both the Ontario provincial and federal legislation, determined that most provincial legislation governing privacy and information sharing recognized the sharing of such information to be essential under certain circumstances (i.e. the Freedom of Information and Protection of Privacy Act; the Municipal Freedom of Information and Protection of Privacy Act; and The Personal Health Information Protection Act). Situation Tables in Ontario, however, have unintentionally discouraged the practice of sharing such confidential information between participating agencies.

To address the assumption that such information cannot be shared, the Ontario government put together *An Interpretive Guide to Information Sharing Practices in Ontario*, which provides guidance on information sharing at three distinct levels.⁴ The first level of guidance related to information sharing at Situation Tables deals in general terms with the sharing of information, both verbally and through documentation, in the interests of community safety and well-being. It led to the development of eight framing principles:

- do no harm in that practitioners must continually operate to the best of their ability in ways that will more positively than negatively impact those whose privacy may be affected;
- a duty of care on public officials involved with social services who must assume a high degree of professional responsibility to protect individuals and communities from harm;
- professional discipline (i.e. the Four Filter progressive process) when making decisions to share personal information;
- consistent purpose so that personal information is shared only for purposes that can be reasonably deemed to be consistent with the role of the information holder;

³ Russell and Taylor, 2014, *An Interpretive Guide to Information Sharing Practices in Ontario....within the Context of Collaborative, Risk-Driven Community Safety and Well-being*. Government of Ontario: Canada.

⁴ Ibid.

- consent or implied consent, recognizing that consent is the best and most reliable way to share personal information of the subject and that a potential deficiency in care and/or a danger to individuals or to community safety may constitute a valid reason to disclose information under the principle of implied consent;
- precise rules are neither possible nor appropriate as it is not possible to make hard and fast determinations about sharing or withholding information, and a consensus of experts can provide the necessary framework to assist in navigating through many of the legislative and regulatory conditions established for these purposes;
- due diligence is required by professionals in making these often difficult determinations on the basis of myriad considerations about the situation; and
- legislated opportunities may exist to clarify language in the area of information sharing.⁵

Level two of the *Interpretive Guide* provides guidance for policy makers and data managers on systems-wide information and data sharing. The analysis of risk-based data collected at the Situation Tables may lead to lasting improvements for Ontario communities as the information will guide the planning and priority-setting of the agencies involved.

Decisions and future investments should be informed by evidence-based data related to the health and safety of communities, families and individuals. Examples include data that tracks the greatest demands placed on police, correction and courts, as well as data from the health and addiction sectors. Integrated health, social services, education and criminal justice data analysis will help to identify and plan predictive risk patterns at local, regional and provincial levels.

Cultural change must also play a significant role in advancing developments in the area of information sharing between social service agencies. The various parts of the social service system have a long-standing tradition of not sharing their trend data with other parts of the system. Prevailing assumptions about the need to secure data for reasons of privacy have done much to reinforce and justify such positions. The Open Government initiative of Ontario may, however, change this as the policy calls for open publication of all Government

⁵ Russell and Taylor, 2014

documents unless a solid case can be made that the data should remain protected and unpublished.

Level three is about specific guidance for practitioners at collaborative, risk-driven Situation Tables. At these tables practitioners from a variety of social service sectors identify cases in need of multi-agency, collaborative intervention, and develop immediate plans for such interventions in order to reduce elevated risk situations that are likely to create harm to individuals, families or the community if left unattended. Acutely elevated risk is the threshold for determining the substance of conversations at Situation Tables. The Prince Albert, Saskatchewan Four Filter approach is the recommended model for Tables to adopt for information sharing since it will:

- only allow situations of acutely elevated risk to be discussed;
- minimize identifiable personal information that is disclosed at the Table;
- limit the number of agencies to which information is disclosed; and
- limit the recording of identifiable information and ensure that no identifiable information is recorded in the central records of the Situation Table.

Like the Four Filter approach employed by the Saskatchewan Hub, the Ontario government put together *An Interpretive Guide to Information Sharing Practices in Ontario*, designed to guide Ontario Situation Tables in their information sharing practices and support general inter-agency collaboration.

SUMMARY OF PRESENTATIONS AND DISCUSSIONS

Day 1

Opening and Welcome Address

Norm Taylor, Senior Advisor to the Deputy Ministers responsible for Policing, Governments of Saskatchewan and Ontario

Session Moderator Norm Taylor welcomed all participants and started the dialogue session by saying that there are new models of community safety and well-being where agencies come together to share information in safe and legal ways. A culture of collaboration is created when all community agencies cooperate to address risk-driven situations affecting individuals or families. Multi-agency collaboration has taken different forms across the country while sharing certain base commonalities: in Saskatchewan and Alberta they use Hubs; in Ontario they use Situation Tables. Mr. Taylor believes that all provinces and many communities can benefit by using one of these models of collaborative community safety and well-being, in particular as they pertain to information sharing for the purpose of facilitating coordinated, multi-agency interventions. The greatest benefit of this coordinated, community-based response to risk is the long-term social return on investment created by addressing risk through appropriate measures, such as counselling and housing support, rather than through the use of law enforcement and the criminal justice system exclusively.

Context Setting

Executive Panel

Mark Potter, Director General, Policing Policy Directorate, Public Safety Canada

Mr. Potter noted the many strengths of integrated, pro-active models of community safety and well-being and placed them in the historical context and evolution of policing and community safety principles and approaches. Such models are founded on a grass roots strategy in which frontline community agencies cooperate and share information in order to orient effectively all available resources and help those in need. Over time, such models

promote social cohesion, get at the roots of crime and can help to place individuals, families and communities on positive social development trajectories. Partner engagement within these models is the key to success, as is the need for ongoing community, provincial and national support. Mr. Potter emphasized the need for firm, evidence-based research to inform these models and bring efficiencies to the new partner systems they create. He also noted that this approach to addressing risk in our communities is an integral element of the Public Safety Canada-led *Economics of Policing and Community Safety Shared Forward Agenda*, in particular, Pillar 2 of this strategy, which supports the expansion of New Models of Community Safety throughout Canada. He noted the broad support of all governments and the policing community for the ongoing assessment, development and expansion of such models and thanked Saskatchewan and Ontario for their leadership in this field.

Dale McFee, Deputy Minister of Corrections and Policing, Government of Saskatchewan

Deputy Minister McFee spoke about privacy-focussed information sharing in the best interests of the client. He noted that the benefits regarding sharing information between community agencies and professionals are demonstrated in the evidence-based outcomes.

Deputy Minister McFee stated that the Four Filter approach in the Saskatchewan Hubs works well within privacy legislation. Agencies meet twice weekly, for about 90 minutes, and deal only with cases judged to be at ‘acutely elevated risk.’ The agencies work on follow-up interventions in which they attempt to connect clients with appropriate social services in order to reduce the client’s acutely elevated risk. While connection with services may not eliminate the individual’s risk, it can be reduced from a crisis requiring immediate and intense support to a level that can be managed by ongoing supports from social services. Responsible agencies will report back to the Hub on the client’s success following the referral of a client to that social services agency for intervention. The responsible agency will only share anonymized data about the client, omitting the client’s name and any personal information.

Data collected following the implementation of collaborative and coordinated interventions demonstrates a reduction in both individual and community risk that is not achieved by a

lone-agency intervention. The long-term benefits of an integrated and collaborative approach include reducing the demand for community and financial resources required to support individuals in a state of acutely elevated risk or crisis. As there is never enough supply of community and financial resources to fill the demand for crisis response, interventions that address compounding risk factors are also intended to reduce the demands on all parts of the system.

Deputy Minister McFee is of the view that privacy legislation that allows for the sharing of information between community service agencies is designed to complement legislation that requires social services to help those in need and at imminent risk of harm. He noted that there is no need for new legislation. At the same time, Deputy Minister McFee emphasized the need to bring rigour and discipline to the sharing of information. This includes training for agencies that are sharing information, to ensure everyone does so in a consistent fashion and within the boundaries of the law. His overall message with regard to the development of information sharing practices was ‘just keep it simple.’

Deputy Minister McFee said it is essential to acquire good data in order to get evidence-based outcomes for community hot-spotting. Based on a spectrum of health, well-being, prosperity and criminogenic factors, hot-spotting would determine concentrations of at-risk and under-serviced individuals and specific locations in a community.

Matt Torigian, Deputy Minister of Community Safety, Government of Ontario

Deputy Minister Torigian began by saying that this dialogue session is about information sharing, leadership and the need to transform service delivery to promote the safety and well-being of Ontario communities. Collaborative interventions should be a way of doing business and not the basis for a new program or strategy. The multi-agency, multi-sector, risk-driven initiatives being developed across Ontario will enable various community agencies to work together by sharing information in ways that enhance community safety and well-being. This community mobilization is about breaking barriers and getting people to talk to one another in order to improve service delivery and outcomes for Ontarians.

Governance and oversight are the keys to success for these multi-agency intervention models. Efficient use of resources is required to meet the demand for services and address

the needs of individuals and communities at risk in order to reduce emergency response and replace it with appropriate interventions focused on prevention. Deputy Minister Torigian emphasized that we are good at responding to incidents, but that a greater focus should be placed on recognizing and addressing the range of risk factors that are often present in the lead-up to an incident. By dealing with these factors before they escalate to the level of incidents, we can prevent crime, we can prevent harm, and we can set up individuals and communities to succeed. We need to move to a culture of collaboration in which information is shared in a professional and disciplined manner to deliver services in a more efficient and effective way, and improve the lives of the people we serve. There is a need for buy-in from all community agencies if we are to ensure community safety and well-being.

Deputy Minister Torigian outlined the five principles that the Ontario Ministry of Community Safety and Correctional Services believes should be used to guide collaborative community safety and well-being initiatives in Ontario communities:

1. Commitment at the Highest Level – community safety and well-being planning is a community-wide initiative that requires dedication and input from every agency, organization, group and citizen. High-level leadership will help to ensure that the right people come to the table.
2. Collaboration – no single agency owns the planning exercise. A plan will only be as effective as the partnerships and collaboration that exist among participants.
3. Risk-Focused Plans - to reduce risk that data indicate are most prevalent in the community in order to ensure the most strategic use of resources.
4. Asset-Based – it is important to plan using the strengths, capacity and resources that already exist in the community. This principle recognizes that local partners already have the knowledge and experience to discern what works and what doesn't.
5. Measurable Outcomes – it is no longer good enough to measure just what is done in a community; it is imperative to measure the impact of what was done.

Practitioner Panel

Norm Taylor, Moderator

Mr. Taylor led off by reviewing what is meant by a risk-driven approach. He noted that we are very good at employing incident-driven and reactive measures to respond to incidents, but it is often too late to address the incident effectively, let alone confront the compounding issues that led up to the incident. A risk-driven approach addresses, in real time, the recognized conditions that have placed individuals, families and/or neighbourhoods at imminent risk of harm, disorder and conflict with the law. This preventative approach allows us to deal with the issues before they become crises, thus avoiding incident-driven responses. Mr. Taylor introduced the panelists, who, he noted, are among the most experienced individuals in this arena in Canada, and whose knowledge of the multi-agency community safety and well-being models reflects both policy and practice.

Dale Tesarowski, Senior Crown Counsel, Ministry of Justice, Government of Saskatchewan

In 2011, Saskatchewan's Joint Policy Committee, in conjunction with the Building Partnerships to Reduce Crime and other forums, identified the need for a review of information sharing, particularly with regard to cross-government responses to child, youth and family issues. Information sharing has been identified as a key issue, in particular the barriers (real or perceived) that inhibit social service providers from achieving their goals, including their capacity to effectively address risk in our communities.

The Joint Policy Committee identified the need to develop guiding principles to govern information sharing practices between agencies. The Committee also identified the need to ascertain the appropriate balance between sharing personal information and protecting privacy. In order to work effectively between disciplines and/or agencies, and to better serve children, youth and families, there is a need for appropriate access to personal information.

As a result, the Joint Policy Committee decided to establish an inter-ministry working group, known as the Information Sharing Issues Working Group (ISIWG) which is comprised of Corrections and Policing, Saskatchewan Justice, Health, Social Services, and Education. Chaired by Saskatchewan Justice, ISIWG began developing principles, processes and a plan to move forward using case examples such as Community Mobilization Prince Albert (commonly known as the Prince Albert Hub) to identify obstacles and potential approaches to solve them.

Since that time, the ISIWG has conducted a Privacy Impact Assessment of the Prince Albert Hub, which was in turn used by the Privacy Commissioner in a review of that program. The ISIWG also developed interim guidelines for information sharing in integrated service situations; prepared a draft Information Sharing Agreement and a standard referral template for use in the context of the Hub; conducted training for Hub partners; and helped draft regulations to guide future information sharing situations.

The ISIWG recognized early on that there was legislative authority in Saskatchewan for appropriate information sharing between parties at the Hub level to address almost all situations. However, Mr. Tesarowski recommends to other provinces that if privacy legislation is to be amended, it should provide for express legislative authority for appropriate information sharing within the integrated service delivery context.

Ensuring appropriate, collaborative and holistic service delivery in a community-based environment was the primary reason for the development of the ISWIG Information Sharing Guidelines. The Guidelines are intended to provide information about privacy rules; to support an integrated approach to service delivery that addresses acute elevated risk by strengthening the ability to share information; enable effective mobilization of supports and services; and prevent the unnecessary sharing of personal information when doing so would not be supported by legislation or policy.

The ISIWG proposed, as part of the Guidelines, the Four Filter approach to sharing information between service providers in order to ensure these parties meet privacy expectations. The objective of the Filters is to:

- allow only situations of acutely elevated risk in which multi-agency help is needed to be discussed between agencies;
- minimize the identifiable personal and health information that is disclosed by providing brief facts and age range (rather than a specific age);
- limit the agencies to which personal information is disclosed once it is determined which agencies should be involved; and
- limit the recording of identifiable information (i.e. only agencies with a role to play in the collaborative service delivery are exposed to and permitted to record identifiable information within their own agency files, and no identifiable information is recorded in the central records of the Hub).

Scott McKean, Manager, Community Development, City of Toronto

Mr. McKean spoke about his invitation from the Toronto Police Service to visit the Hub in Prince Albert, which impressed him and complimented the City of Toronto's interests in what Glasgow, Scotland was doing in regards to the Glasgow Community Safety Services and the Govanhill Operational Hub. After the visit, the Toronto Police Service, the City of Toronto and United Way Toronto developed FOCUS Rexdale, a Situation Table to complement existing strategies to address crime and disorder in Toronto. Mr. McKean said that the widespread belief that privacy legislation does not allow for sharing of personal information between social service agencies in any situation resulted in fear and misunderstanding on this issue. Rather than develop a legal agreement between partners in the FOCUS Rexdale initiative, United Way Toronto contracted a lawyer to work with a City of Toronto legal representative in developing a framework similar to the Four Filter process in Saskatchewan. Training was provided on the Toronto information sharing protocol and to ensure that situations were presented in line with the protocol, FOCUS Rexdale also developed a referral template to be used by partners to refer situations from their own organizations to the Situation Table.

Agencies began to feel more comfortable working together and it had a ripple effect in the sharing of information among participating agencies increased. To ensure the information sharing protocol was adhered to, FOCUS Rexdale invited City of Toronto legal representative to audit the process.

The Ontario Privacy Commissioner interjected that if sharing is done right, there is no prohibition to sharing personal information. It is not a question of a balance between information sharing and privacy. When it is permitted by law, information may be shared in order to provide health care without express consent being required, as, for example, pursuant to Ontario's Personal Health Information Protection Act, [section 40.1-3](#).

Bill Davidson, Executive Director, Langs

Mr. Davidson and his community partners co-located 20 health and social service agencies in a unique, multi-use facility where they more recently established a Connectivity (Hub) Table in Cambridge, Ontario, in 2013. In less than a year, 16 agencies addressed 97 situations of elevated risk at the Connectivity Table. It has become a model for system reform because there was a need to look at clients in a more holistic way and to put their needs and that of the community first.

At the Connectivity Table, the Four Filter model is used to ensure information is shared properly. The Connectivity Table has privacy officers who are appointed and employed by each individual participating agency to ensure compliance. Like the Hub and Situation Tables, the Connectivity Table collects anonymized data regarding the clients they serve. Mr. Davidson noted the importance of determining what to do with data collected.

Mr. Davidson also noted the need to engage with clients early to address any existing factors in their lives that put them at risk before their circumstances becomes critical. There is a need to build protective factors into the model. Also, the system requires an integrated record for clients so that they do not have to repeat their history to different agencies each time.

Rae Gallivan, Executive Director of Strategic Engagement Branch, Ministry of Justice, Saskatchewan

The Hub model has been implemented in many communities in Saskatchewan following the example of Prince Albert, initially with varying approaches. However, two common elements of the Hub are in place everywhere: the Four Filter approach to information sharing and local consensus on the definition of acutely elevated level of risk.

Ms. Gallivan's office has since become responsible for program fidelity, and works with Hub tables to reach a consensus on the definition of acutely elevated level of risk and to ensure that Hub tables are competent in applying the Four Filter model. Hub tables across Saskatchewan now practice discipline and rigour in following the Four Filter approach. With respect to sustainability, situations in which the same issues keep coming up signal the need to improve client outcomes through the implementation of a more efficient system. The identification of recurring issues has led the province to advance the establishment of more Centres of Responsibility (COR) in order to continue the multi-sector work toward systemic change and wider applications of predictive analytics.

Brent Kalinowski, Project Manager, Community Mobilization North Bay (CMNB), Ontario

Mr. Kalinowski noted that when discussions began in North Bay with regard to the implementation of a Hub model, the initial reaction among communities was one of discomfort in the face of change and concerns about privacy barriers to sharing personal information. However, there was an early willingness to move forward using the Four Filter approach implemented in Saskatchewan to allow for greater collaboration.

The process of implementing the Four Filter approach in North Bay exposed certain gaps in communication practices and knowledge around the operations of the Hub. The first gap identified was the lack of communication between the agencies participating in Hub meetings and how it affects those at risk. The identification of this gap prompted agencies to connect more frequently outside of the Hub table meetings. The risk-driven process also highlighted a manpower gap at the Canadian Mental Health Association, prompting the agency to fill a new position to assist with this innovative work. Multiple Hub discussions exposed glaring misconceptions about Hub communications, which prompted some of CMNB's stakeholders to review policies and re-educate personnel.

The resulting successful outcomes for individuals and families from this collaborative work demonstrated the value and importance of the Hub model. As Hub participants continued to meet, the agencies made changes to the communication processes and were able to demonstrate success, which helped to decrease initial levels of discomfort. A common

consensus among professionals is needed in the Hub to determine what the threshold for sharing an individual's information will be, regardless of the definition used for "elevated risk".

Discussion

Further discussion centered on the need for discipline and training in order to address privacy concerns. Discipline and rigour are required in following the rules and providing training about those rules. Acutely elevated risk is the threshold or catalyst for sharing limited personal information so there needs to be a clear and agreed-upon process to get there through the use of standard referral templates, the Four Filter process, and information sharing agreements.

There was agreement that Privacy Commissioners need to be consulted and involved in discussions around privacy and information sharing in the context of inter-disciplinary community safety and well-being models, such as the Hub or Situation Table. Privacy investigations are not intended to be punitive. Their findings and recommendations help us to learn from past mistakes in order to ensure that they do not occur in the future.

While neither the Ontario nor Saskatchewan governments felt that immediate legislative amendments were required for their jurisdiction to proceed with information sharing within these inter-disciplinary community safety and well-being models, both provinces would welcome express legislative authority for appropriate information sharing in this context. Nevertheless, the consensus was that privacy laws are not barriers to information sharing, provided the rules are followed. There may still be impediments to information sharing related to organizational cultures or the need for proper training, but privacy legislation does permit information sharing in specific circumstances. In certain jurisdictions, privacy legislation was drafted to favour a siloed approach to the housing of personal information, and may be outdated. It was agreed that where an opportunity presents itself, there are benefits to reviewing privacy legislation.

Participants at the Workshop also discussed risk-driven databases. Saskatchewan has established a Risk Tracking Database (RTD) and has shared their model with Ontario, which now has a Proof of Concept Project underway. The Saskatchewan and Ontario RTDs provide insight into the level of risk experienced at the community and provincial levels, and allow for new sources of planning data. The databases identify the highest frequencies and highest priorities as they relate to composite risk factors and specific age groups. They can also track successful interventions in reducing risk factors including mental illness, substance abuse, family issues, and others appropriate to the age groups most affected.

The RTD data informs strategies to help solve long-standing problems affecting the specific community or province. This allows for resources to be focused on areas where they are most needed, and involves an ongoing process of refinement. The alignment of appropriate resources to address risk factors is most effectively realized when patterns of risk can be identified, particularly in cases of “acutely elevated risk.” Through the identification of these patterns, resources can be invested to mitigate these risks and prevent other individuals from reaching a level of acutely elevated risk.

This information is important to communities because it allows for the refocusing of resources to make a difference in ways that respond to patterns of supply and demand. Risk factors are an evolutionary process and that is why good data is needed – but that data must be anonymized. Once there is a community profile, other agencies can get involved quickly, and interventions are accelerated. Through Hubs or Situation Tables, the participation of relevant social service agencies allows for the provision of a variety of responses that can ideally be delivered before an incident-based response becomes necessary, often involving a police arrest or call-for-service.

Hubs are considered to be more effective and cost efficient approaches to addressing acutely elevated risk in our communities, in comparison to law enforcement and criminal justice approaches. However, in order for Hubs to work, the participating social service agencies need to share information. In addition, a methodology is required to extract data regarding community risk levels, as well as more collaborative community planning models; both will help ensure that appropriate services are made available to address the identified

risks before individuals, families or communities reach a level of risk that requires a more invasive and intervention.

Participants all voiced the need for tools to set up their own Hubs or Situation Tables, including manuals, templates, guidelines and training. There was general frustration expressed with regard to agencies using the privacy issue as an excuse to avoid collaboration. Those who prefer to work on their own rather than engage with other agencies impede service providers in their efforts to effectively address an individual's or family's risk of harm. Participants noted that we should not look at the cost of sharing, but instead at the cost of *not* sharing as it may jeopardize the well-being of those at risk.

Day 2

Overview of Day 1 Outcomes

Day 2 discussions were facilitated by Barry Zehr, Superintendent, External Relations Branch, Ontario, and built on the outcomes from Day One. The focus was on best practices that can be applied nationally to share a client's personal information between agencies involved in inter-disciplinary community safety and well-being models, while respecting the client's right to privacy. There was consensus that these models can work within existing privacy legislation that allows for the sharing of personal information, provided a disciplined approach is taken and privacy rules are followed.

Discussion

What was heard from Day 1 was that there were opportunities within existing legislation to share the personal information of individuals experiencing acutely elevated risk, and that there is a need to do so within these collaborative inter-disciplinary community safety and well-being models in order to ensure optimal service delivery by community services. Participants identified three components required for the successful implementation of models:

- rigour and consistency in the design and implementation of a disciplined model to ensure the legal and defensible exchange of information;
- training to ensure a uniform approach to the implementation and use of the model; and
- engagement with privacy commissioners and a form of routine audits or practical review cycle to ensure conformity with the model design and practices.

In order to ensure consistency in the design of inter-disciplinary community safety and well-being models as they are implemented across Canada, participants suggested the development of a 'Hub in a Box' that would include guidelines on the sharing of information within such models; the training necessary to implement the model; and tools that can be used by all communities. Participants also noted the need to include an agreed-upon

definition of ‘acutely elevated risk’ so that a threshold for the sharing of information could be established consistently across communities. The ‘Hub in a Box’ would provide high-level direction to communities wishing to implement such an inter-agency approach, but would also encourage communities to tailor the models to their specific needs.

There was a strong recognition of the need to change the way we look at service delivery in all social service sectors in order for individuals and families to get the services they need when they need them. Relying solely on incident-driven responses to community safety and well-being is inefficient, ineffective and unsustainable. Ontario participants highlighted their draft framework for community safety and well-being planning. This framework sets the stage for service delivery and for the development of local community safety and well-being plans to encourage meaningful multi-sectorial partnerships that can respond to crime and complex social issues on a sustainable basis. It is hoped that communities will be inspired to refocus their efforts toward meaningful collaboration, an environment that promotes information and data sharing, and holistic, outcome-based performance measurements.

Participants recognized that the ‘Hub in a Box’ model and the ‘Framework for Community Safety and Well-being Planning’ would require the support and championing of leaders from communities across the country in order to be truly effective. Moving forward, participants agreed that the discussion needed to include not only police and justice but also health and education. One of the challenges identified is the need to engage leaders in order to gain support for this model at the highest levels.

Finally, participants recognized the need for ongoing research in the area of inter-disciplinary community safety and well-being models and for metrics and evaluation methodologies to determine the effectiveness of the models. It would be beneficial if these anonymized metrics could be shared widely, as they can serve as indicators of possible outcomes.

Overview and Next Steps

Moving forward on the subject of inter-disciplinary community safety and well-being models and on information sharing, participants indicated an interest in:

- a learning event;
- sharing of information, tools and best practices;
- the establishment of a working group; and
- ongoing research and evaluation.

An inter-disciplinary learning event for 80 to 100 people that focuses on community safety and well-being models was identified as the next step to bring people together to discuss developments related to the Hub and Situation Tables. This event would also provide information on the implementation of inter-disciplinary community safety and well-being models at the community level. Public Safety Canada agreed to examine the possibility of hosting such an event late 2015 or early 2016.

Public Safety also agreed to consider the creation of an inter-disciplinary community safety and well-being models working group. The Department will consult with Federal, Provincial and Territorial partners and other stakeholders to determine the mandate and composition of such a working group. Feedback from these consultations would be shared with participants from this workshop.

It was agreed that ongoing research and evaluation of inter-disciplinary community safety and well-being models is required to ensure the rigour of the models to improve upon existing practices, and to learn from the implementation of the model in various community settings. The consistent collection of data from models across the country would contribute greatly to such research and evaluation. The group therefore agreed that proper methodologies for data collection must be implemented and that such methods must always ensure the protection of private information.

Appendix A: List of Participants

Economics of Policing and Community Safety: National Policy Makers' Dialogue on Privacy and Information Sharing Workshop January 20-21, 2015 Ottawa Room, 111 Sussex Drive Ottawa, Ontario	
PARTICIPANT LIST	
Name	Title
Facilitator	
Norm Taylor	Senior Advisor, Governments of Saskatchewan and Ontario
Public Safety Canada	
Mark Potter	Director General, Aboriginal and Policing Policy Directorate, Public Safety Canada
Annie LeBlanc	Senior Director, RCMP Policy Division, Public Safety Canada
Rachel Huggins	Manager, Policy and Coordination Unit, Public Safety Canada
David Akman	Senior Policy Analyst, Policy and Coordination Unit, Public Safety Canada
Christina Wright	Policy Advisor, Policy and Coordination Unit, Public Safety Canada
Catherine Licari	Policy Analyst, Policy and Coordination Unit, Public Safety Canada
Erin Robinson	Senior Policy Advisor, Aboriginal Policing Policy Division, Public Safety Canada
Adam St. John	Policy Advisor, National Security Policy Directorate, Public Safety Canada
Saskatchewan	
Dale McFee	Deputy Minister of Corrections and Policing, Ministry of Justice, Government of Saskatchewan
Rae Gallivan	Executive Director of Strategic Engagement Branch, Ministry of Justice, Government of Saskatchewan
Dale Tesarowski	Senior Crown Council, Strategic Initiatives and Program Support, Ministry of Justice, Government of Saskatchewan

Ontario	
Matt Torigian	Deputy Minister of Community Safety, Ministry of Community Safety and Correctional Services, Government of Ontario
Stephen Waldie	Director, External Relations Branch, Ministry of Community Safety and Correctional Services, Government of Ontario
Morgan Terry	Community Safety Analyst, Program Development Section, Ministry of Community Safety and Correctional Services, Government of Ontario
Brian Beamish	A/Commissioner, Office of the Information and Privacy Commissioner of Ontario
Renee Barrette	Director of Policy, Office of the Information and Privacy Commissioner of Ontario
Scott McKean	Manager, Community Development, City of Toronto
Brent Kalinowski	Project Manager, Community Mobilization North Bay, Ontario
Barry Zehr	Superintendent, External Relations Branch, Government of Ontario
Bill Davidson	Executive Director, Langs
British Columbia	
Shabnem Afzal	Senior Program Manager, Crime Reduction and Performance Management, Ministry of Justice, Government of British Columbia
Elenore Clarke	Provincial Director, Corrections Branch, Ministry of Justice, Government of British Columbia
Alberta	
Lindsay Daniller	Director, Community Initiatives and Development, REACH Edmonton
Nova Scotia	
Don Spicer	Director of Crime Prevention, Department of Justice, Government of Nova Scotia
Tina Hall	Solicitor, Public Safety & Security Division, Justice Department, Government of Nova Scotia
Prince Edward Island	
Cindy Wedge	Director of Prosecutions, Crown Attorney's Office, Department of Environment, Labour and Justice, Government of Prince Edward Island
Verna Ryan	Director, Mental Health & Addictions, Health PEI, Department of Health and Wellness, Government of Prince Edward Island
Gordon Garrison	Policing Services Manager, Policing Services, Department of Environment, Labour and Justice, Government of Prince Edward Island
RCMP	
Philippe Van Dyk	Policy Analyst, Strategic Policy and Planning Directorate, RCMP
Catherine Costain	Officer in Charge, RCMP National Crime Prevention Services, Contract and Aboriginal Policing, RCMP
Shelly Dupont	Inspector, Provincial Hub/COR Coordinator, Operations Strategy Branch, F Division, RCMP

Constance Roussel	Sergeant, RCMP representative, Hub/ COR, Community Mobilization Prince Albert, F Division, RCMP
Steve Strike	Sergeant, Federal Policing, RCMP
CAPG	
Cathryn Palmer	President, Canadian Association of Police Governance
Jennifer Malloy	Executive Director, Canadian Association of Police Governance

Appendix B: Agenda

2015

ECONOMICS OF POLICING AND COMMUNITY SAFETY NATIONAL POLICY MAKERS' DIALOGUE ON PRIVACY AND INFORMATION SHARING WORKSHOP

AGENDA

JANUARY 20-21, 2015
OTTAWA ROOM, 111 SUSSEX DRIVE
OTTAWA, ONTARIO

*DRESS ATTIRE: BUSINESS CASUAL

DAY 1

JANUARY 20, 2015

OPENING AND WELCOME ADDRESS

7:30 – 8:30 BREAKFAST

8:30 – 9:15 **Set Up of the Day by Facilitator**
Norm Taylor

CONTEXT SETTING

9:15 – 10:00 **Executive Panel**
Mark Potter, Director General, Aboriginal and Policing Policy
Directorate, Public Safety Canada
Dale McFee, Deputy Minister of Corrections and Policing, Government
of Saskatchewan
Matt Torigian, Deputy Minister of Community Safety, Government of
Ontario

10:00 - 10:30 BREAK

10:30 – noon **Practitioner Panel**
Facilitated by Norm Taylor

Saskatchewan

Dale Tesarowski, Senior Crown Council, Strategic Initiatives and Program Support, Ministry of Justice, Government of Saskatchewan
Rae Gallivan, Executive Director of Strategic Engagement Branch, Ministry of Justice, Government of Saskatchewan

Ontario

Scott McKean, Manager, Community Development, City of Toronto
Brent Kalinowski, Project Manager, Community Mobilization North Bay
Bill Davidson, Executive Director, Langs

Noon - 1:00

LUNCH

INFORMATION SHARING IN INTER-DISCIPLINARY COMMUNITY SAFETY AND WELL-BEING MODELS

1:00 – 2:00

Discussion Session

Facilitated by Norm Taylor

Facilitated discussion to address perceived obstacles to information sharing within the context of an inter-disciplinary community safety and well-being model.

2:00 - 2:15

BREAK

2:15 – 4:00

Discussion Session (Cont.)

DAY 2

JANUARY 21, 2015

DRAFTING NATIONAL PRIVACY AND INFORMATION SHARING GUIDELINES

7:30 – 8:30

BREAKFAST

8:30 – 9:00

Overview of Day 1 Outcomes

9:00 – 10:15

Discussion Session

Facilitated by Barry Zehr, Superintendent, External Relations Branch,
Government of Ontario

*Facilitated discussion on the outcomes from Day One and best
practices that can be used nationally to share information within inter-
disciplinary community safety and well-being models.*

10:15 - 10:30

BREAK

10:30 – 11:30

Discussion Session (Cont.)

CLOSING

11:30 – noon

Overview of Next Steps

Mark Potter, Director General, Aboriginal and Policing Policy
Directorate, Public Safety Canada

End of Workshop

Appendix C: Saskatchewan Information and Privacy Commissioner Recommendations and the response from the Ministry of Justice

The following sets out the recommendations at paragraph 80 of the Saskatchewan Information and Privacy Commissioner's Investigation Report 105/2014, dated November 10, 2014, and the response found at paragraph 81 by the Ministry of Justice to those recommendations.

Recommendations:

"In summary, I recommend:

1. That the partner agencies work together to ensure that the need-to-know and the data minimization principles are consistently applied. This should include the following:
 - a. Development and mandatory use by all partner agencies of a standard referral form. It should include all the elements recommended in this preliminary analysis.
 - i. All program participants must receive training on its proper use.
 - b. A restructuring of Hub table discussions that includes:
 - i. Only those with a demonstrable need-to-know remain in the room past Filter Two.
 - c. That authority is clarified for post Hub interventions and for any research undertaken by any partner agencies.
 - i. Agencies restrict staff access to data holdings where need-to-know cannot be established.
 - ii. Complete a joint Privacy Impact Assessment addressing COR activities to ensure compliance with FOIP, LA FOIP and HIPA.
 - d. That there is a clear segregation of duties between Hub and COR representatives.
 - e. All databases, lists or excel spreadsheets linking case number and client names be destroyed.
2. That a comprehensive plan is developed and implemented to ensure deficiencies pertaining to agreements, policy, procedure, notice, training and documentation are addressed in a consistent way by all partner agencies. For example, this plan should address the following:

- a. Consent. The default should be to seek consent of individuals. If consent is not sought then reasons should be documented. During Filter 1 discussions, originating agencies should indicate if consent was obtained.
- b. Notice. Information provided on partner websites should include details about CMPA information sharing practices, how individuals can request access and who to contact with privacy questions or concerns.
 - i. A process needs to be developed for responding to privacy complaints and the program's designated Privacy Officer should receive access and privacy training.
- c. Accuracy. Some specific issues to address include:
 - i. Facebook should not be used as a data collection tool.
 - ii. Unconfirmed or suspected risk factors
 - 1. A requirement to confirm mental health information when law enforcement is involved and further to adopt the Ontario Commissioner's Mental Health Disclosure test if possible disclosure via CPIC is being considered.
- d. Record keeping. Decisions and authority need to be documented.
- e. Need-to-know, data minimization and de-identification.

3. That when there is a review of access and privacy legislation that consideration is given to bringing municipal police services under LA FOIP. At the same time, amendments should be introduced to clarify the rules for interagency sharing in FOIP, LA FOIP and HIPA including a requirement for partner agencies to enter into written information sharing agreements when they participate in common integrated program delivery.”

The Saskatchewan's Ministry of Justice on October 10, 2014, accepted the recommendations and advised that they intend to work towards compliance as follows:

“1. The Ministry of Justice will work with the partner agencies towards improved and consistent application of the need-to-know and the data minimization principles. This will include:

- a. Development of a standardized referral form template to be used by all participating agencies. The intent is to develop a form that ensures consistent practice with regard to core elements of the referral (consent, authority, etc.) but allows adaptation to individual needs.

b. Development of a training strategy to ensure consistent training of Hub participants and participating agencies, including ensuring program participants receive training on proper use of a standardized form.

c. Modifying the Four Filter process (and thus the Hub discussions) and considering legislative amendments to ensure personal information is only disclosed as needed to support the service during the Filter 3 phase. It is the Ministry's view that central to identifying the necessary service and/or service providers that may be required to further participate in the discussion to alleviate acutely elevated risk, at some point during Filter 3, discussions on limited identifiable information may need to be shared. The proposed regulations will address this issue.

d. Clarifying authority for post Hub interventions and for any research undertaken by any partner agencies in relation to Hub/COR activities. This includes ensuring agency staff access agency data holdings only where a need-to-know is established.

2. Justice will cause a joint Privacy Impact Assessment addressing COR activities to be completed. Processes and policy will be reviewed to ensure there is a clear segregation of duties between Hub and COR representatives.

3. Any databases, lists or excel spreadsheets held at the CMPA linking case number and client names will be destroyed. A de-identified database will remain with the COR. Partner agencies will retain internal cross references to Hub cases for which they have a client relationship.

4. Justice will lead the development and implementation of a comprehensive plan to improve how access and privacy is addressed in agreements, policy, procedure, notice, training and documentation by all partner agencies, including approaches to consent, providing notice, accuracy, record keeping, decisions, documentation, need-to-know, data minimization and de-identification.

5. Legislative change will be pursued to clarify rules for interagency sharing of personal information and personal health information including a requirement for partner agencies to enter into written information sharing agreements when participating in common integrated program delivery.

6. Finally, inclusion of municipal police services will be considered as part of any future review of access and privacy legislation.

As you will know, the Ministries of Justice and Health have proposed a set of regulations to clarify authority for information sharing at the Hub, including requiring that participants enter into information sharing agreements before sharing information at the Hub. Those regulations, which were shared with your office in 2013, will be reviewed and updated as necessary in light of your analysis.”