

COVID-19 Personal Information Disclosure Recommendations

The COVID-19 Pandemic management operation has mobilized many Indigenous Services Canada frontline services and elevated the responsiveness of the department. In order to better inform and guide Departmental officials, this preliminary and interim guidance has been prepared in relation to Client Confidentiality and Departmental responsibilities and obligation as they relate to the Privacy of individuals and personal information.

General

1. **Personal information** is defined as **any information about an identifiable individual** that is recorded in any form.
2. Personal information shall not be disclosed without the consent of the individual to whom it relates, unless the disclosure is in accordance with *Privacy Act* and the *Canadian Charter of Rights and Freedoms*.
3. The collection, use and disclosure of personal information must be limited to the individuals that need the information to complete their operational requirements. The *Privacy Act* and related TBS policies provide the framework for the appropriate collection, use and disclosure of personal information.

Indigenous Services Canada takes the privacy of individuals seriously. Employees of the department are required to abide by the laws and policies which govern their activities.

Information (type and formats)	Collection, use and disclosure recommendation	Role / Position
Personal Medical information collected through COVID-19 frontline care activities (medical records, X-rays and other diagnostic imaging, test results, treatment plans, reports, patient related correspondences, public opinion research, health hazard assessments and evaluations, surveillance and monitoring documentation)	<p>Collection: For a purpose as identified in the personal information banks for Communicable Disease Control and Management (PIB - HC PPU 023) and Clinical and Client Care (PIB - HC PPU 014).</p> <p>Use: The provision of urgent and non-urgent health services (including treatment, laboratory and other investigations, referrals and consultations with other health care providers) and the provision of screening, testing and therapy to prevent, treat, monitor and control cases and outbreaks of communicable disease.</p> <p>Disclosure: For the purposes of communicable disease control and/or outbreak management, information from individual cases may be disclosed to those engaged in the management of the case or the public health response. Under specific conditions personal information may be disclosed to with social agencies and child welfare authorities, when necessary for the protection of an individual or the public at large.</p> <p>* Use and Disclosure between FNIHB identified employees and Provincial public health authorities would be considered a consistent use.</p>	ISC frontline employees supporting response activities <ul style="list-style-type: none"> • Nurse Practitioners / Nurse In-charge • Regional Medical Officers of Health (FNIHB) • Regional Epidemiologists (limited) • HQ Epidemiologists (limited)

<p>Aggregate depersonalized information collected through COVID-19 Case Management and Response Activities functions undertaken at/by ISC (Community level and Demographic information)</p>	<p>Collection: As required / provided by ISC Employees to undertake departmentally mandate functions as related to the COVID-19 Pandemic Response</p> <p>Use: To support planning and response activities related to the COVID-19 pandemic. Specifically to coordinate and facilitate community level action, such as deployment of health professionals (including, but not limited to nurses, paramedics, physicians, and other identified healthcare staff) and personal protective equipment. To support the activities relative to the response activities (within ISC’s mandate): infrastructure; medical transportation; allocation of resources to respond to community demands, etc. To support daily reporting by the PHAC.</p> <p>Disclosure: For the purposes of communicable disease control and/or outbreak management, information from individual cases may be disclosed to those engaged in the planning and response activities related to outbreak within ISC. * Aggregate depersonalized information may be disclosed externally to CIRNAC, Health Canada, Public Health Agency of Canada employees, Provincial Public Health officials for quality assurance purposes or specifically related to the planning and response activities related to outbreak. ** Community specific aggregated and depersonalized information could be disclosed to associated Community leadership specifically for public health planning and response purposes.</p>	<p>ISC employees supporting response activities:</p> <ul style="list-style-type: none"> • Minister’s Office (ISC/CIRNAC) • CMO of Public Health and delegates, such as the Regional Medical Officers of Health, Pandemic Response team leads and their delegates • Senior management, such as the DM, Assistant Deputy Ministers of for FNIHB other members of the ISC Critical Incident Command Centre and Emergency Operations Centre • Director, Communicable Disease Control and delegates, such as epidemiologists and Senior Nursing Manager • Regional Executives, Regional Director Generals, and their delegates, such as Regional Emergency Management/Communicable Disease Emergencies planning team leads • Chief Nursing Officer, Directors of Nursing, and their delegates. <p>All the previously listed roles.</p>
<p>Aggregate depersonalized information collected through COVID-19 Case Management and Response Activities functions undertaken at/by ISC (regional and demographical information where population base exceeds lower limit for re-identification)</p>	<p>Collection: As provided by ISC Employees to provide senior management to report/brief on the COVID-19 Pandemic Response</p> <p>Use: To support planning, response, and communications activities.</p> <p>Disclosure: Public disclosure</p>	<p>Minister’s Offices, Senior Management, Communications</p>

If you have any question related to disclosure of personal information please contact the Access to Information and Privacy Directorate at aadnc.upvp-ppu.aandc@canada.ca or 1-819-953-3947.