



# Data Ethics Framework and Privacy Management Framework

## Questions and answers

### What is the Data Ethics Framework?

The [Data Ethics Framework](#) (DEF) is a strategic framework that focuses on the ethical collection, management, and use of data across the Government of Alberta (GoA). The DEF is structured around four core principles: accountability, equity, privacy and protection, and transparency.

### What is the DEF expected to do?

The DEF emphasizes the importance of understanding the diversity and perspectives connected to data, while also highlighting the importance of recognizing risks (such as bias). The DEF is intended to provide a consistent approach in the identification of limitations, risks, and opportunities of data from an ethics perspective.

### Who needs to consider the DEF in their work?

The DEF applies to anyone working directly or indirectly with data in the Alberta Public Service (APS), including data practitioners (statisticians, analysts, and data scientists), operational staff, those developing data-informed recommendations and policy, and decision-makers. If you have used a spreadsheet or entered information into a form, you are a data person.

The DEF applies to all data, with personally identifiable information and without. For example, when making decisions or implementing programs, APS staff must be aware of biases that may be present in the data or in their interpretation of the data.

### Do other jurisdictions have an equivalent to the DEF?

Yes, development of the DEF was informed by work done by other jurisdictions (including Australia and New Zealand), post-secondary institutions, and the Organization for Economic Cooperation and Development. While there are jurisdictions working on equivalent frameworks, Alberta is a leader within Canada in having a comprehensive data ethics framework.

### Does the DEF consider Indigenous data?

Yes, the DEF reflects the interests of Indigenous Peoples and other marginalized groups when measuring, collecting, and reporting data relating to those populations; and

### What is the Privacy Management Framework?

The [Privacy Management Framework](#) (PMF) provides high-level strategic direction to maintain consistent and effective privacy management across the GoA. The PMF is structured around four core principles: planning, security and control, openness, and accountability.

### What is the PMF expected to do?

The PMF assists the GoA in meeting its legislative obligations and supports the development and implementation of better systems and services. It is intended to provide Albertans with confidence that their personal information is safeguarded, and improve their overall trust in the GoA as an open and accountable steward of personal information.

### Who needs to consider the PMF in their work?

The PMF applies to all APS staff, whether they work directly or indirectly with personal information (for example, operational staff who collect personal information directly from Albertans or manage it in an approved system/application).

All APS staff work with information, systems, and applications that likely contain some personal information that, if compromised, could negatively impact Albertans.

### Do other jurisdictions have an equivalent to the PMF?

Yes, other jurisdictions, including the governments of Canada and British Columbia, have developed privacy management frameworks. The development of the PMF was informed by multiple jurisdictions, including, but not limited to, the Government of Canada, the Government of British Columbia, and the federal and state governments of Australia.

### What is privacy-by-design?

Privacy-by-design means privacy considerations are proactively integrated into all business processes so that personally identifiable information is protected by default.

recognizes the equal value of knowledge shared by Indigenous Peoples.

### **How does the DEF affect our department's day-to-day work?**

The DEF highlights ethical considerations that are to be addressed when working with data. Your department may have practices and guidelines that support the principles but might not be labeled as “ethics” – like using inclusive language or explaining your data collection practices. The DEF is an additional lens to look at our work and assess it for ethical impacts – this is especially applicable when developing new programs, services, and applications.

### **Why are these frameworks coming forward now?**

As APS members, we use data and personal information every day to make operational decisions, inform policy, and provide digital services.

The GoA recognizes the opportunities and risks associated with a rapidly evolving digital world. In order to develop and deploy modern secure government digital services, it is critical that we ensure that:

- privacy and personal information of Albertans is protected and managed through a privacy-by-design approach; and
- all data in the custody of the GoA is used ethically.

These frameworks were developed to provide guidance to APS staff to achieve these outcomes and demonstrate our commitment to protecting privacy and ensuring the ethical use of data.

### **How do these frameworks fit with other government initiatives?**

These frameworks support the development and deployment of modern, secure, digital government services that Albertans can access more easily and that enable government to operate more efficiently.

In addition, the [Alberta Anti-Racism Action Plan](#) calls for the development of data ethics and privacy management frameworks to enable the collection of disaggregated race-based data to support programs/services that address racism in our province.

### **Do the frameworks supersede legislation, policies, or departmental direction or initiatives?**

No, the frameworks are complementary to existing legislative frameworks and do not take the place of, nor do they conflict with, existing legislated requirements (such as the [Freedom of Information and Protection of Privacy Act](#) or the [Health Information Act](#)); these requirements are paramount to the frameworks.

The DEF is designed to support department-level initiatives, policies, and legislation relating to data collection, management, and use. The PMF aims to support existing efforts to comply with existing privacy legislation while promoting a privacy-by-design approach in the development of government programs and services.

### **Is training available?**

Training for APS staff is currently under development and will be available via MyLearning in 1GX. Additional resources, such as toolkits to facilitate discussions and overviews of the frameworks, can be found on the landing pages: [DEF](#) and [PMF](#).

### **Who can I contact about the frameworks and how to apply them?**

Technology and Innovation is dedicated to assisting departments, agencies, boards, and commissions in applying these frameworks at any stage, and especially when initiating a new program, service and/or application.

If you have any questions about the frameworks, please contact Technology and Innovation's Information Management Technology Policy Program at [imt.policy@gov.ab.ca](mailto:imt.policy@gov.ab.ca).

This is a common approach used and accepted by privacy leaders internationally.

### **How does the PMF affect our department's day-to-day work?**

The PMF provides guidance for APS staff on protecting Albertans' privacy and personal information in compliance with privacy legislation. It is especially applicable when developing new programs, services, and applications, in that privacy-by-design dictates that privacy considerations are to be considered at the very outset of these processes.

