



May 31, 2024

Standing Committee on Resource Stewardship, c/o Committee Clerk
3rd Floor, 9820 - 107 Street NW
Edmonton, Alberta T5K 1E7

Submitted via email at RSCommittee.Admin@assembly.ab.ca

Dear Mr. Garth Rowswell:

Thank you to the Standing Committee on Resource Stewardship for the invitation to make a submission on the comprehensive review of the Personal Information Privacy Act (PIPA) that the committee is undertaking.

About CCVO

CCVO (Calgary Chamber of Voluntary Organizations) is a member-based charitable organization that was established in 2004 to strengthen Calgary's vibrant nonprofit sector, and address sector-related public policy issues in Alberta. The high quality of life enjoyed in our communities is built on many of the programs, activities, and services run by more than 30,000 nonprofits and charities that make up Alberta's nonprofit sector. We are proud to support these organizations through our sector research, advocacy, and informed convening and programming activities.

About Alberta's Nonprofits

Our sector fills critical needs for the province of Alberta: food and basic needs, immigrant settlement supports, senior and childcare supports, sports and recreation, arts and culture, entrepreneurship, environmental health – and more. We provide the social capital, services, and infrastructure critical to attracting workers across all sectors. The full spectrum of services and activities provided by our essential sector make Alberta a great place to live, work, and play in a rapidly changing and competitive global economy. Our sector employs 285,000 people in Alberta – 78% of whom are women – and contributes \$5.5 billion to our GDP while leveraging an astounding 227 million volunteer hours annually. If this volunteer labour were conservatively valued at \$21/hour, it amounts to nearly another \$5 billion.

Approximately half of Alberta's nonprofits operate with no staff, they are run fully by volunteers. All nonprofits are governed by a volunteer Board of Directors, so even those nonprofits with staff capacity are operating with the contribution of significant volunteer time. Most Alberta nonprofits are small organizations, for example, 87% of Alberta charities have annual operating budgets under \$1 million, and 52% of charities have budgets under \$100,000.

PIPA and Alberta's Nonprofits

PIPA is Alberta's private sector privacy law. As such, it only applies to nonprofits for information collected, used or disclosed for commercial activity. This principle was established when the legislation came to effect in 2004 and was upheld in the 2015 comprehensive review of the legislation.

The Government of Alberta has created [an excellent site dedicated to PIPA and nonprofits](#). This site provides nonprofits with:

- a clear explanation of what is included in commercial activity, and most pertinently for many nonprofits, that accepting donations for charitable purposes is not a commercial activity.
- valuable resources to help nonprofits determine whether or not they are subject to PIPA and how to comply with the legislation.
- sample statements, forms, and policies.

The current approach to PIPA and Alberta's nonprofits is effective and efficient. We have had no requests to change this legislation as it relates to nonprofits, nor are we aware of any issues that have arisen as a result of the current approach.

Given limited resources and access to legal expertise, the majority of Alberta nonprofits will not have the capacity to readily interpret and comply with any changes to this legislation that broaden its scope to apply to all nonprofit activities beyond the commercial activities to which it already applies. Additionally, many nonprofits are already in compliance with other pieces of privacy legislation such as the Health Information Act (HIA) and Freedom of Information and Protection of Privacy Act (FOIP).

Broadening the current approach for nonprofits within the PIPA legislation will cause confusion among the sector, add workload to an already stressed sector, and create red tape for the Government of Alberta and nonprofits alike. It would require resources, education, and training for nonprofits to comprehend and comply while not increasing the privacy protection of Albertans from commercial interests.

Recommendations

1. We respectfully request maintenance of the current approach with this legislation in its application to nonprofits in Alberta for commercial activity. This principle applies to any considerations made for advancements in AI: regulate any commercial activities of private information collected by nonprofits.
2. Promote the existing Government of Alberta PIPA resources for nonprofits. CCVO and our partners would be pleased to support the Government of Alberta in promoting the existing PIPA resources through our extensive reach with Alberta's nonprofits.

Thank you for taking the time to fully consider our submission. We are available, at your convenience, to respond to any questions you may have regarding this submission. We would also be pleased to appear before committee. You can reach Karen Ball at kball@calgarycvo.org or [REDACTED] for any further discussion or inquiries.

Sincerely,



Karen Ball
President and CEO, CCVO