

Gathering and Managing Sensitive Information



Managing Sensitive Information

Collecting sensitive equity, diversity and inclusion (EDI) data.

Informed consent.

Steps when gathering and managing sensitive information.

Mining companies will gather and manage sensitive information as they develop and implement strategies and action plans to establish workplace EDI. Sensitive information is data that must be carefully managed to protect an individual, group or organization from risks associated with disclosure or inappropriate use. Balancing corporate transparency and demonstrating reliability in sensitive data management promotes trust and a willingness to provide consent and share information, contributing to evidence-based objectives, activities and EDI effectiveness.

What is sensitive information?

Data that requires protection, as the loss, misuse or modification of such data could result in harm to an individual and/or an organization. Companies that operate in Canada and collect and manage sensitive information are bound by the Personal Information Protection and Electronic Documents Act (PIPEDA) Fair Information Principles, as well as by provincial and local laws in some jurisdictions.

What is informed consent?¹

Ensures individuals are aware of and understand the risks associated with sharing their information so that informed decisions are being made about any information shared. It involves fully disclosing the information necessary to make an informed decision about sharing information or participating in data-gathering activities. An individual must be capable of understanding the associated risks to provide consent or have a legal guardian present to provide consent.

Steps to Gathering and Managing Sensitive Information

1. Create a Data Management Policy.
2. Obtain Informed Consent.
 - a. Why is personal information being collected? How will it be used and/or disclosed?
 - b. What information is being gathered?
 - c. Who will have access to the data? With whom will it be shared?
 - d. What are the risks?
3. Collect Only Necessary Data.
4. Manage Data, Safeguarding for Access, Storage, Retention and Destruction.

¹ PIPEDA also refers to 'meaningful consent,' when individuals are given clear information explaining what organizations are doing with their information.

