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Utilize document clustering, automated redaction and other advanced tools to quickly find and redact responsive documents. Streamline request processing, instantly generate required reports and eliminate backlog under full compliance with your government’s open access laws.

67% processing time saved
350 agencies and offices
4:1 average discovery time reduction
Dear conference delegates,

Welcome to the 2019 Access and Privacy Conference, hosted by the University of Alberta's Faculty of Extension. Our theme for this year's conference is *The Continued Evolution*.

I wish to thank our Conference Advisory Committee for pulling together an outstanding lineup of speakers. In 2019, we celebrate 17 years of delivering Canada's foremost information rights conference. This year, our speakers will educate you on the intricacies of access to information, privacy protection, IT security, and private sector information rights administration. I hope that you will find the days that you spend here both engaging and insightful.

This year's conference offers cutting-edge topic presentations that you will find useful back at your workplaces, and for your own expanded knowledge of this challenging and exciting new field and profession.

We are also recognizing and celebrating our three 2019 IAPP Program Award recipients: Willie Grieve (awarded posthumously), Janet Cummings, and Cara-Lynn Stelmack. The IAPP program is proud to recognize the positive contributions that each of these individuals have made to our access and privacy profession and the field of information rights administration and education. All of our award recipients have contributed to advancing the understanding and the widening of our knowledge within the ever-expanding field of access and privacy. The Faculty of Extension wishes to acknowledge and thank them for their positive support to the IAPP program and our annual national conference.

We welcome our Commissioner/Ombudsman speakers: Jill Clayton (Alberta), Michael McEvoy (BC), Caroline Maynard (OIC, Ottawa), Gregory Smolyne (OPC, Ottawa), and Elaine Keenan Bengts (NWT & Nunavut). We also wish to thank all of our expert conference speakers for their positive contributions to the success of this year's conference. We encourage you to network and connect with our impressive list of conference speakers.

I wish to thank our sponsors who have joined us this year. Their valuable contributions help us to deliver the conference quality that you have come to expect. I also wish to thank our talented marketing team that works together with the IAPP program staff to deliver an enjoyable conference experience for all of our delegates.

Lastly, I thank you, our delegates, who have taken the time out of your schedules to come and join us. I hope that you enjoy the 2019 Access and Privacy Conference!

Wayne MacDonald
Conference Chair, 2019 Access and Privacy Conference
The River Cree Resort and Casino strives to provide exceptional conference services; we ask that you kindly leave the session rooms during breaks so that staff can have time to recharge the room.

Our delegates with dietary restrictions should receive “dietary restriction” cards in their nametag holders. They can be presented at meal times to a member of the River Cree Resort and Casino catering staff, who will then arrange for their meal to be brought to them.

If you noted specific dietary restrictions in your original online registration, but have not received these cards, please visit the registration desk at any time to obtain them.

Should presenters choose to provide them, printed information materials (PowerPoint slides, notesheets, etc.) will be made available during the sessions. Additionally, if provided, electronic copies of presentation materials will be posted on the conference website (accessandprivacy.com) at the end of the conference, as they become available.

Please ensure that your cellphone is off, silent, or on vibrate while a session is in progress.

Join the conversation on Twitter and Instagram, using the hashtag #UAAlbertaAP19.
### Program at a Glance

#### Wednesday, June 12

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<td>7:00 am</td>
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<td>Breakfast served at 8:15 am</td>
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#### Thursday, June 13

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<td>8:30</td>
<td>Welcome and Conference Opening Comments</td>
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<td>9:00</td>
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<td>10:00</td>
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<td>Plenary Presentation: John Weigelt</td>
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<td>3:30</td>
<td>Breakout Sessions D, E &amp; F</td>
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#### Friday, June 14

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<td>Keynote Address: Michael McEvoy</td>
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<td>Plenary Presentation: Barbara Bucknell</td>
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<tr>
<td>3:15</td>
<td>Closing Remarks</td>
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WEDNESDAY, JUNE 12

7:00 am–9:00 am  Registration
      Breakfast served at 8:15 am

9:00 am–12:00 pm  Morning Workshops 1, 2 & 3

WORKSHOP 1

Beginner Severing Techniques: An Art & Science... Ready, Set, Sever!
Sindy Chang, Joanne Gardiner, and Natalie Paul

Join us for a show about what happens when dissension in the workplace, and access and privacy legislation, meet! A real-life example presents quite a jam as a manager tries to keep two co-workers happy, despite not seeing eye-to-eye. Through a skit and group exercises, attendees will get a chance to apply severing skills in a fun setting. Examine exceptions from the Freedom of Information and Protection of Privacy (FOIP) Act to figure out who gets what! This show is definitely one you don’t want to miss!

**Sindy Chang** began her career with the Government of Alberta in records management, which led her to understand the significance and complexity of implementing proper record-keeping within a large ministry. Sindy gained an interest in the field of access and privacy and has since worked as an Access and Privacy (FOIP) Advisor in the ministry of Sustainable Resource Development and Justice and Solicitor General. She currently works with the Community Services and Safety Sector of Service Alberta, providing FOIP services for Justice and Solicitor General and Culture and Tourism. Sindy has previously provided access and privacy training to different program areas within the Justice and Solicitor General ministry. She is excited to be involved with this year's conference.

**Joanne Gardiner** is a manager of FOIP Services in Information Access and Protection, Service Alberta, and manages the corporate access and privacy program for the Government of Alberta. This includes the Personal Information Protection Act (PIPA) and the Freedom of Information and Protection of Privacy (FOIP) Act. Joanne is currently in the role of FOIP Coordinator for Service Alberta. Joanne’s educational background is in Environmental Sciences and Computer Science, and yet she ended up as a public servant for over 15 years, working for some of that time with access and privacy in both British Columbia and Alberta. Joanne has spent a substantial amount of time presenting and talking about access and privacy principles, and she hopes everyone thinks “FOIP” is as exciting and fun as she does! Joanne has been on the conference advisory board for a number of years and is a proud 2018 IAPP Award recipient.
Natalie Paul has over 10 years of experience with the Government of Alberta, and previous experience working with multiple post-secondary institutions and the Government of Canada. Natalie currently works as an Access and Privacy (FOIP) Advisor with the Community Services and Safety Sector of Service Alberta, providing FOIP services for Justice and Solicitor General and Culture and Tourism. In the past, she worked with the ministries of Environment and Sustainable Resource Development, Children’s Services, Community and Social Services, Status of Women, Advanced Education, Seniors and Housing, Executive Council, and Public Affairs Bureau. While in Executive Council, Natalie led FOIP training for staff within the Premier’s office, and previously provided training to other ministries. Natalie is serving on several process design committees under the transformation of the delivery of the Government of Alberta’s FOIP services. She is happy to be back as a co-presenter at this conference.

Workshop 2
Apps & Data: Do You Know What Happens After the Download?
Cathy Evanochko, Malcolm Ferguson and Maryann Hammermeister

You have found the most amazing app that will do everything—including slicing bread. All you have to do is enter a little bit of personal information. But what do you know about what data is being collected? How will the data be used? Will it be sold? Kept forever? Who wants to read privacy policies, terms of use, security policies? If you do, come join us, if you don’t, you really should come to our workshop. We will explore the hidden gems that are shrouded in privacy policies, terms of use and security policies. After all, we are responsible for that data.

This session will be in-line with the recommendations made by the International Privacy Commissioner's Resolution on E-Learning Platforms.

Cathy Evanochko has worked for the Calgary Board of Education for 30 years in a variety of positions, both in schools and in administrative settings. For the past nine years, Cathy has been the FOIP Coordinator working out of the Legal Services Department. One of the current priorities has been to set up a privacy impact assessment (PIA) process that is clear and easy to use, both for system-wide tools as well as the Web 2.0 tools used in schools. Cathy has worked hard to change the perspective that FOIP limits the ability to use technology creatively. Rather, Cathy endorses the concept that “I will promote the ethical and innovative use of data. Privacy AND progress, not privacy OR progress.”

Malcolm Ferguson is the FOIP Coordinator for the Edmonton Catholic School District, a position he has held for the past two years. In this capacity, Malcolm is responsible for the overall management of the freedom of information and protection of privacy functions in the district. Previously, Malcolm occupied an Access Advisor position with Alberta Education, where he first gained hands-on experience interpreting and applying the FOIP Act. Malcolm holds a MA and BA from Carleton University, and is a graduate of the Information Access and Protection of Privacy program at the University of Alberta’s Faculty of Extension.

(continued on Page 8)
**WORKSHOP 3**

**OIPC’s Breach Response and Reporting Workshop**
Hermione Ainsworth and Elaine LeBuke

It’s not a matter of if you will have a privacy breach—it’s when. Organizational preparedness is the key to successful privacy breach response. This workshop provides comments on trends in the type and magnitude of breaches reported to the OIPC. Get practical guidance from a regulator’s perspective, based on successful—and unsuccessful—strategies organizations have used to respond to breaches. Discussion will include:

- Building a privacy management program
- Developing a privacy breach response plan
- Establishing your breach response team
- Successful strategies in remediating privacy breaches
- Issues around identifying affected individuals and notification challenges

**Maryann Hammermeister** has worked for Edmonton Public Schools for the past 28 years and has been the District FOIP Coordinator for the past 13 years. She is responsible for all aspects of managing a FOIP program in a large school jurisdiction, including responding to FOI requests and liaising with the Office of the Privacy Commissioner. Maryann is a graduate of the IAPP program at the University of Alberta’s Faculty of Extension and continues expanding her expertise in privacy and access to information issues. In 2018, Maryann was the proud recipient of the Robert C. Clark award for her work in advancing access to information in Alberta.

**Hermione Ainsworth** joined the Office of the Information and Privacy Commissioner of Alberta in 2018 as a Senior Information and Privacy Manager on the Compliance and Special Investigations team, where she performs reviews of privacy impact assessments and self-reported breaches, and is involved in offence investigations.

Prior to her current role, Hermione spent 11 years with Deloitte’s Enterprise Risk Services team, both in the United Kingdom and Canada, working on consulting, advisory, and compliance engagements across a variety of industries. More recently, she worked for the Office of the Auditor General as an Information Systems Audit Manager, directing her skills and experience into helping to keep the provincial government accountable for their results and spending.

Her career has primarily focused on information technology and enterprise risk, through the provision of advice and guidance, identifying areas for improvement, and assessing compliance with regulatory requirements and internal controls for organizations.
**Elaine LeBuke** has been with the Office of the Information and Privacy Commissioner of Alberta since 2011. In her role as Senior Information and Privacy Manager on the Compliance and Special Investigations team, she reviews privacy complaints, privacy impact assessments, self-reported breaches, and conducts privacy investigations.

Elaine holds a Bachelor of Arts, a Master of Arts, and a Bachelor of Laws from the University of Alberta. She is also a graduate with distinction of the Information Access and Protection of Privacy certificate program from the University of Alberta’s Faculty of Extension.

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**WORKSHOP 4**

**Advanced Severing Techniques for the Senior Practitioner**

Christine Badach, Janet Cummings, and Joanne Gardiner

Discuss real-life severing examples that look at bylaws and managing conflict between neighbours, as well as a potentially sensitive (albeit hypothetical) government briefing information. Join our team of experts to explore advanced severing techniques and talk about local public body confidences, advice, media information, intergovernmental relations, and more. This workshop features all-new case studies and practice opportunities for workshop participants to become proficient and knowledgeable about application of exceptions and severing approaches.

**Christine Badach** has worked in the information access and privacy field for approximately six years. She is currently an Access and Privacy (FOIP) Advisor in the Community Services and Safety Sector of Service Alberta, providing FOIP services for Justice and Solicitor General and Culture and Tourism. Christine considers herself to have had the good fortune of working in multiple FOIP offices over the course of her career, allowing her to experience the diversity of how FOIP is approached in various ministries. Christine successfully completed the IAPP certificate program at the University of Alberta's Faculty of Extension. She looks forward to her continued personal growth in the information access and privacy field.

**Janet Cummings** *(please see Page 25)*

**Joanne Gardiner** *(please see Page 6)*
Workshop 5
Privacy: The Law, Cannabis Use, and You
Patricia Paradis (Moderator), Larry Kearley, Birch K. Miller, and Margot Ross Graham

Join our panel of experts as they discuss and share insights into the impacts caused by Canada’s new cannabis legislation. This expert panel will discuss how Canada’s new law allowing cannabis use in society impacts existing cannabis laws, presents potentially challenging privacy and privacy rights impacts, and raises significant issues involving workplace expectations and employment of users.

This interactive workshop will engage participants to reflect on and gain a deeper understanding about the legalization and use of cannabis in Canada.

Patricia Paradis is the Executive Director of the Centre for Constitutional Studies at the University of Alberta, where she manages the Centre’s constitutional research and public education mandates. Patricia is a frequent speaker on the Constitution, and in her capacity as Executive Director, she edits two journals and organizes public events, symposia, workshops, and conferences on constitutional issues.

Patricia has had a lengthy career as a human rights educator and advisor. She has taught “Human Rights Law in Canada” in the Faculty of Law as a sessional instructor for the past 20 years. Patricia has served as the Chair or Director of several boards, notably the Chair of the LEAF (Women’s Legal Education and Action Fund) National Board from 1995-1999. She is currently a Board Director with the Parkland Institute and the Alberta Civil Liberties Research Centre, as well as a National Section Executive Member for the Canadian Bar Association National Constitutional and Human Rights section and the National Alternative Dispute Resolution section.

Laurence Kearley worked as Senior Legal Counsel and as Director of Legal Services and General Counsel with the Office of the Information Commissioner of Canada from 1998 until his retirement from the public service of Canada in January, 2011. He was called to the bar of Ontario in 1974 after graduating from Osgoode Hall Law School. In 1996, he received his Masters of Law degree in International Law, specializing in the international protection of privacy, from the University of Ottawa Law School. Mr. Kearley has taught law at the University of Windsor Law School and Osgoode Hall Law School. He currently teaches Privacy Law for the University of Alberta and consults in the fields of access to information and privacy law and policy.

Mr. Kearley has specialized in freedom of information and privacy law for the last 25 years and has written extensively in both fields. He is a frequent speaker on freedom of information and privacy issues. He currently is President of the Canadian Access and Privacy Association and Vice-President of the Canadian Institute of Access and Privacy Professionals. In 2011, Mr. Kearley won the University of Alberta, Faculty of Extension “Excellence in Innovation and Design for Lifelong Learning Award.” This award recognizes “innovation in a wide spectrum of concepts and approaches that
will help in achieving learning outcomes, including programs, courses, and learning activities.” In 2016, Mr. Kearley was the recipient of the 2016 Information Access and Protection of Privacy Program Award for “Outstanding Leadership and Contribution to the Field of Access and Privacy in Alberta and Canada.”

**Birch K. Miller** partner, Blake, Cassels & Graydon LLP, practices in the areas of employment and privacy law. She provides advice to clients in respect of all laws relating to workplace issues, including recruiting, hiring, discipline, terminations, employment and labour standards, human rights, disability and benefits, and alcohol and drug testing. She also advises on the collection, use, and disclosure of personal, health, sensitive, technological, and other types of information, such as the application of provincial and federal privacy and anti-spam laws.

Birch assists clients with drafting and reviewing employment- and privacy-related documentation, ranging from employment and independent contractor agreements, severance packages, and confidentiality agreements, to non-competition and non-solicitation agreements, as well as workplace policies and handbooks. She is also well versed in litigation, tribunal, and arbitrations matters, including wrongful dismissal, provincial and federal privacy commission, employment and labour standards, and human rights commission matters.

Birch has extensive transactional experience, regularly advising on the privacy, labour, and employment aspects of mergers and acquisitions. Prior to joining Blake, Cassels & Graydon LLP, she was a partner at another international law firm as well as in-house counsel for a major Canadian energy company.

**Margot Ross Graham** CPHR, CPCC, is the owner of Sandbar Coaching and Consulting. Prior to building her own firm, Margot spent several years in senior executive roles with small- and mid-size Alberta companies. She has extensive background and expertise leading change and process improvement initiatives as companies move through their organizational life cycle. She has particular expertise in human resources, leadership, integration, and organizational development. Margot provides consulting and facilitation services in areas such as organizational assessments, strategic planning, leadership development, succession planning, change and transition, and human resources. Key areas of expertise include facilitation, organization assessments, strategic human resources, talent development, and board and executive director evaluations.

Margot currently is the well-known and popular CBC radio Edmonton AM workplace columnist. She works with CBC radio to discuss workplace issues ranging from employee onboarding to goalsetting and performance management.
WORKSHOP 6
An Exploration of New and Emerging Technology Trends
Lea Beeken

In this interactive workshop, attendees will discover and investigate collaboratively emerging technologies that impact privacy. Some trends include Artificial Intelligence, Facial Recognition, DNA profiling, and more.

Engage in a conversation about risk and reward with respect to these technologies and gain a new understanding of the balancing act that advocates must make to be relevant and timely in their contribution to the larger discussion of information rights.

Bring a smartphone, laptop, or Chromebook, and expect to play the role of a consumer, a reporter, or a researcher as we drill into the newest technologies coming soon to your personal or work life.

After working as a math teacher, department head, curriculum coordinator, and assistant principal at a number of Edmonton Public schools, Lea Beeken took the lead into the new world of records management and FOIP in 2005.

At the helm of a new department, Lea and her staff tackled records classification and retention, FOIP awareness and training, development of a semi-active records storage facility, and development of digital records for the employee file and the student record. She is currently leading a team developing programs to support data governance, video surveillance systems, compliance, and privacy.

4:15–8:00 pm Hospitality Suite [Sponsored by Cenera]

On Wednesday, June 12, Cenera invites all delegates to join us in our hospitality suite – Room 2011 of the River Cree Resort and Casino. This is an excellent opportunity to network with fellow delegates and other partners, while enjoying complimentary beverages and snacks – a great way to relax and prepare for the next two days of the conference.

To access the hospitality suite, please visit the registration desk in front of the Enoch meeting rooms in the hotel foyer. A representative of the conference will accompany you to this card-access only suite on the second floor of the hotel.
THURSDAY, JUNE 13

7:00–8:30 am  Registration  
Breakfast served at 7:30 am

8:30–9:00 am  Welcome and Opening Comments  
Dr. Katy Campbell  
Dean, Faculty of Extension, University of Alberta  
Greetings from the Government of Alberta  
Jill Clayton  
Alberta Information and Privacy Commissioner

9:00–9:45 am  Keynote Address: Caroline Maynard

KEYNOTE ADDRESS

Collaborating for Canadians:  
Best Practices from the Information Commissioner of Canada  
Caroline Maynard, Information Commissioner of Canada

Caroline Maynard, the Information Commissioner of Canada, will tell you about the lessons she has learned during the first year of her mandate, and will share some practical examples that illustrate the benefits of a collaborative approach between complainants, institutions, and her office.

Caroline Maynard was appointed to the position of Information Commissioner of Canada for a seven-year term on March 1st, 2018.

Commissioner Maynard’s legal career with the Government of Canada spans 20 years, during which time she progressively assumed different senior leadership positions within oversight agencies.

After serving as Director General of Operations and General Counsel with the Military Grievances External Review Committee for 11 years, Commissioner Maynard led the organization as Interim Chairperson and Chief Executive Officer from January 2017 to March 2018. From 2001 to 2006, she was Legal Counsel at the Office of the Judge Advocate General at the Department of National Defence, and from 1998 to 2001, she was Legal Counsel at the Royal Canadian Mounted Police External Review Committee. Prior to this, Commissioner Maynard also worked with the Canada Revenue Agency and briefly in private practice.

Caroline Maynard holds a Bachelor of Laws from the Université de Sherbrooke, and has been a member of the Québec Bar since 1994. A native of Saint-Hyacinthe, she lives in the National Capital Region with her spouse and her three teenage sons.
Discourses of Privacy
Gregory Smolynec, Deputy Commissioner – Policy and Promotion, Office of the Privacy Commissioner of Canada

What are the discourses of privacy in government and in the private sector? Gregory Smolynec, Canada’s new Deputy Privacy Commissioner, Policy and Promotion, Office of the Privacy Commissioner of Canada, will discuss the rhetoric around privacy and its effects on other human rights and our democracy.

Gregory Smolynec is Deputy Commissioner, Policy and Promotion, in the Office of the Privacy Commissioner of Canada. The Promotion Program is future-looking and aims to inform Canadians of their rights and how to exercise them, and to bring organizations toward compliance with the law. Gregory leads the OPC Policy and Promotion team in developing and promoting general, yet practical, information and guidance, and in developing advice on specific initiatives.

Prior to his appointment, Gregory served as Director General, Strategic Initiatives, in the Strategic Joint Staff at National Defence Headquarters. As DGSI, he led the Strategic Outlook function for the Canadian Armed Forces. Strategic Outlook is an analytical, decision-support process designed to identify and analyze the central military and technological challenges facing Canada and to inform strategic decision-making and advice to government.

Gregory began his career with the Department of National Defence as a Strategic Analyst in Defence R&D Canada. He has worked in several organizations within the Department of National Defence as an analyst and has held a series of progressively responsible executive positions in the public service. He has a Bachelor of Arts in History from McGill University, a Master of Arts in Russian and East European Studies from Carleton University, and a Doctorate in History from Duke University.
Empowering Individuals Through Use of Trustworthy Artificial Intelligence

John Weigelt, Chief National Technology Officer, Microsoft Canada

Artificial intelligence is the latest area of innovation undertaken by Microsoft, a world leader in technology. In this presentation, John Weigelt, Microsoft’s Chief National Technology Officer, will share the latest thinking and insights that Microsoft is developing involving Artificial Intelligence.

John Weigelt, Chief National Technology Officer of Microsoft Canada, leads Microsoft Canada’s strategic policy and technology efforts. In this role, Mr. Weigelt helps business and governments innovate with technology while avoiding the unintended consequences that might arise. John leads Canadian outreach for a variety of technology policies including: Economic Development, Privacy, Security, Government 3.0, Accessibility, Environmental Sustainability, and Interoperability.

A strategic thinker, John has contributed to the development of international standards and guidelines, government policies, national strategies, provincial and federal legislation. These contributions range from the detailed technical specificity of protocol definition to macroeconomic principles.
12:00–1:15 pm   Lunch
1:15–2:15 pm   Commissioners’ Round Table

Commissioners’ Round Table

Moderator:   Brian Hamilton
Panel Members:  Jill Clayton, Elaine Keenan-Bengts, Caroline Maynard, Michael McEvoy, and Gregory Smolynec

Join our Moderator, Brian Hamilton, for an enjoyable and interactive session with Canada’s Commissioners responsible for access to information and privacy protection oversight

**Brian Hamilton** *(please see Page 23)*

**Jill Clayton** was sworn in as Alberta’s third Information and Privacy Commissioner on February 1, 2012. She began her career with Alberta’s Office of the Information and Privacy Commissioner (OIPC) in 2004, as a portfolio officer with the team responsible for ensuring oversight and compliance with Alberta’s Personal Information Protection Act (PIPA). She served as Acting Director, PIPA, from 2007 to 2008 and Director, PIPA, from 2008 to 2011. In June of 2010, Jill was appointed Assistant Commissioner, responsible for the development, implementation, and oversight of amendments to PIPA, particularly mandatory breach notification requirements. Prior to her service with the OIPC, Jill worked as a privacy consultant, providing services to public and private sector clients, primarily in the health care, oil and gas, telecommunications, and non-profit sectors. She also worked for the Bethany Care Society from 2001 to 2002, in management and performance measurement, and as records management coordinator from 1998 to 2000. Born in Calgary, Ms. Clayton holds a degree in history (BA) and environmental design (MEDes Planning) from the University of Calgary.

**Elaine Keenan Bengts** was appointed as the first Information and Privacy Commissioner (IPC) of the Northwest Territories in 1997. She has since been re-appointed in 2000, 2005, 2010, and 2015. Elaine was also appointed as the first Information and Privacy Commissioner of Nunavut in early 2000, and she continues to hold that position today.

Elaine has lived in Yellowknife since 1970. She attended the University of Alberta, where she earned a B.A. in Political Science and Economics and an LLB. Elaine returned to Yellowknife to article under J. E. Richard with the firm then known as Searle, Richard, Kingsmill. She continued in her practice with that firm for three years before opening her own firm in 1988. In addition to her responsibilities as the Information and Privacy Commissioner of the Northwest Territories and Nunavut, she continued her law practice until 2014, focusing her practice in the area of family law.

**Caroline Maynard** *(please see Page 13)*

**Michael McEvoy** *(please see Page 24)*

**Gregory Smolynec** *(please see Page 14)*
Information Access and Protection of Privacy

Certificate Program

→ Fully online.
→ 1-2 years of part-time study.
→ 5 courses needed to graduate.

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SESSION A
2018–2019 Alberta Information and Privacy Commissioner Rulings
Clark Dalton and Rick Leech

This presentation will review some of the major orders coming out of Alberta’s Information and Privacy Commissioner’s Office, as well as selected decisions of the Court of Queen’s Bench on judicial reviews, and discuss how they could potentially affect your professional work. The topics presented will be relevant for FOIP professionals, legal experts, and users alike.

Clark Dalton, Former Director, Alberta Justice, Legal Research and Analysis section. Before his retirement in 2005, Clark provided policy advice and legislative development for over 100 civil law statutes and regulations under the administration of the Minister of Justice and the Attorney General, including the development of the Freedom of Information and Protection of Privacy Act. Clark was also a member of the Board of Alberta Law Conference of Canada. He provides semi-annual updates to the Annotated Freedom of Information and Protection of Privacy Act.

Clark is retiring again for a third time after the 2019 conference. The Organizing Committee of the University of Alberta’s annual national conference wishes to thank Clark for his very positive contributions to the success of our conference over the years. The Committee joins Clark’s many admirers and colleagues in wishing him the very best in his future endeavors.

Rick Leech, has worked as a part-time contract legal researcher and library consultant since 1991. In that role he completed legal research, both traditional and computer assisted; indexing, abstracting, and editing of legal decisions and articles; library database construction; cataloguing of library materials; and records management administration. Rick also worked for Alberta Justice as the Senior Manager, Judicial Compensation, where he managed the compensation commission processes for Alberta’s judicial officers, as per the constitutionally mandated process to set their compensation in a manner that preserves judicial independence.

Prior to this, Rick managed the Alberta Court Libraries’ System, which provided library and information services for the judiciary and Crown Prosecutors throughout Alberta and for lawyers and the public in Provincial Court base point locations. Rick served as the Director of the Grande Prairie Public Library and worked for 12 years as a lawyer in a private law firm and as corporate counsel.
SESSION B

An Open Dialogue with the Alberta Information and Privacy Commissioner and Senior Staff Members

Jill Clayton, LeRoy Brower, Rachel Hayward, and Cara-Lynn Stelmack

Join Alberta’s Information and Privacy Commissioner and senior staff as they discuss emerging and pressing issues currently facing the OIPC. This session will allow our delegates to engage with the Alberta Commissioner and senior staff, creating an open dialogue and exchange of ideas concerning access and privacy issues and administration.

Jill Clayton (please see Page 16)

LeRoy Brower, Assistant Commissioner, has provided leadership in the areas of access to information, privacy risk assessment, and policy development for the past 20 years. He has held positions with the OIPC of Alberta and for British Columbia, and has worked in the Alberta Ministries of Health, Municipal Affairs, Environment and Energy, and Family and Social Services. Prior to becoming involved in the fields of access to information and privacy, LeRoy was a child abuse investigator for Alberta Social Services.

In LeRoy’s role as Assistant Commissioner, he advises the Commissioner in the development of strategic plans, priorities and procedures for the office, and leads planning and direction for the Intake and Case Review Unit, and the Mediation and Investigation and Compliance and Special Investigations teams.

Rachel Hayward, Director, Compliance and Special Investigations, Office of the Information and Privacy Commissioner of Alberta, possesses more than 15 years of experience in public and private sector privacy. Rachel now oversees the OIPC’s review of breach reports, privacy impact assessments and offence investigations. Prior to her senior leadership role, Rachel managed high-profile investigations, including the office’s largest offence investigation which resulted in 38 charges under the Health Information Act and additional criminal charges. Rachel holds a Master of Public Administration, and is a Certified Privacy Professional and Information Privacy Manager. She is also trained in risk and information systems control, and was recently awarded the status of Fellow of Information Privacy by the International Association of Privacy Professionals.

Cara-Lynn Stelmack (please see Page 25)
TELUS Wise Happiness: Balance and Well-Being In Our Digital World
Nimmi Kanji and Stacey Ponich

TELUS Wise Happiness explores how to build and maintain a healthy relationship with technology and offers tips on ensuring resiliency and well-being in our connected world. Developed with support from Dr. Laurie Santos (Yale) and Dr. Joe Flanders (McGill/Mindspace), the program covers themes such as excessive digital use and screen time, social media comparisons and FOMO, breaking bad habits, social connections, and mindfulness.

Nimmi Kanji is the Director of TELUS Wise, a free educational program offered by TELUS that seeks to empower Canadians to stay safe in our digital world. Since the program’s inception, over 200,000 Canadians of all ages have participated in TELUS Wise workshops across the country. Nimmi started her career at TELUS almost twenty years ago, while attending the University of Calgary. After graduating with a Bachelor of Commerce in Marketing and a Bachelor of Arts in Psychology, and prior to leading TELUS Wise, she spent several years in TELUS Business Marketing. Nimmi is passionate about digital safety and citizenship and is eager to help curb cyberbullying; she resides in Calgary, and enjoys spending her free time with her husband, daughter (11), and son (8).

Stacey Ponich is a business consultant in the TELUS Data and Trust Office. His primary focus is supporting the business with various privacy initiatives, including team member training, as well as data incident reporting and response protocols. He has been with TELUS for most of his life and is passionate about telecommunications and privacy. Stacey is on the board of directors for a Canadian charity that provides humanitarian and medical support to Ecuador, Bolivia, and India. He is also the Chair for the Behaviour Change group within the TELUS National Sustainability Council, and is a TELUS Wise Ambassador. He is often in Edmonton schools and visiting community groups to raise awareness about digital online safety.
SESSION D
Does Privacy Apply When Your Information Is Used by Political Parties?

Moderator: James Hart
Panel Members: Mary Marshall and Michael McEvoy

Explore and discuss issues involving citizen's personal information held by political parties. Currently, personal information held by a political party is exempt from access and privacy legislation. Canada's citizens are demanding greater accountability about how their personal information is collected, used, and disclosed. Situations like Cambridge Analytical have brought this important issue to the forefront, as it is a key element for maintaining a health democracy.

James Hart is a practicing lawyer with Meadows Law. James has a combined focus in administrative, health, environmental, privacy, Aboriginal consultation, and Indigenous law.

Mary Marshall is a lawyer with many years of experience working in the operation of the health system and the delivery of health services. She has a Bachelor of Laws from the University of Toronto and a Master of Laws from the University of Cambridge, and is a member in good standing with the Law Societies of Alberta and Ontario. Mary has been part of a number of significant projects and committees, acting as an advisor, legal consultant, and leader in preparing policy papers and advice on privacy legislation, amendments to the Health Information Act, the Mental Health Act, and other health-related legislation. In 2017, she was appointed vice-chair for the Mental Health Review Panel Roster North Panel.

Mary has also been an active member of numerous boards and committees, including Accreditation Canada; the National Advisory Committee for the University of Alberta’s Information Access and Protection of Privacy Program; and the Complaint Review Committees and Hearing Tribunals under the Health Professions Act.

Michael McEvoy (please see Page 24)
SESSION E

When It’s Okay to Ignore: The Power of the Information and Privacy Commissioner to Authorize a Public Body to Disregard Access to Information Requests
Lorne Randa and Rebecca L. Kos

Identify the criteria required to determine what constitutes a frivolous and vexatious request under Alberta’s FOIP Act and discuss how a public body may receive authorization from the Commissioner to disregard an access to information request that the Commissioner has determined to be frivolous and vexatious.

Learn the definition of frivolous and vexatious as revealed through Commissioner rulings, the rules under which a public body must abide while awaiting the Commissioner’s decision, and how to proceed following receipt of the Commissioner’s decision.

This presentation will be of interest to information rights professionals administering information rights related to Alberta’s FOIP Act.

Lorne Randa is a partner with Brownlee LLP. He graduated from the University of Alberta with a Bachelor of Arts in 2000 and with a Bachelor of Laws in 2005, graduating with distinction in both. Lorne articled with Brownlee LLP; he was called to the Law Society of Alberta in 2006 and to the Law Society of Saskatchewan in 2016. His preferred areas of practice include municipal law, privacy and access to information law, and administrative law, specifically in planning and development, development agreements and other infrastructure and utility cost-recovery mechanisms (including offsite levies and local improvements), telecommunications, and general municipal contracting.

Rebecca L. Kos is an associate with Brownlee LLP, where she practices in municipal and administrative law. Rebecca graduated from the University of Alberta with a Bachelor of Commerce in 2011 and a Juris Doctor in 2014, where she was awarded the George Bligh O’Connor Silver Medal in Law. After graduating from law school, she articulated with Brownlee LLP and was called to the Law Society of Alberta in 2015. Rebecca primarily works with municipalities in the areas of municipal governance and authority, privacy and access to information, property taxation and assessment, and municipal enforcement. She has appeared before all levels of Court in Alberta and a number of administrative tribunals.
SESSION F

Our Health Privacy Policies are Doomed to Fail –
But They Are Probably Not Illegal
Brian Hamilton

A former privacy regulator who now helps the regulated, Brian Hamilton will review policy adoption among
health information custodians since 2001 and give his (sometimes cheeky) take on how effective this effort has
been. This interactive seminar will give participants practical advice on how to develop and implement
common-sense privacy policies and how to avoid pitfalls, ending with a call to arms to move from mere
compliance to useful guidance.

Brian Hamilton, President, BW Hamilton Consulting Inc., MPA, CISA,
CISSP, has over 17 years experience in data privacy, both as regulator and
as privacy officer. Brian is a nationally recognized expert in privacy impact
assessment (PIA), health informatics privacy, incident response, and privacy
offence investigation. His company provides advice to senior leaders on the
application of access and privacy legislation, information governance, and
information security.

Before starting his own firm, Brian served in various positions with the
Alberta Office of the Information and Privacy Commissioner, including as
Director, Compliance and Special Investigations, Director, Health
Information Act, and Investigator. During his time at the OIPC, Brian was
responsible for precedent-setting investigations involving data encryption,
biometric identification, authentication, malware, and business continuity. He
was the lead investigator for Alberta's first privacy offence conviction. Prior
to his time as a regulator, Brian was Senior Manager, Privacy and Security at
Alberta Health and Wellness, where he developed and implemented privacy
and security policies for Alberta Netcare, Canada's first provincial electronic
health record system. Brian is also a past Instructor in the
University of Alberta's Information Access and Protection of Privacy
certificate program.

4:30–5:30 pm   Reception and Networking
Wired magazine called it the “Great Privacy Awakening.” The revelations coming out of the Facebook-Cambridge Analytica scandal caused a seismic shift in our understanding of the potential of social media to impact and even subvert our democratic processes. The scandal galvanized regulators, privacy advocates, and members of the public to demand strengthened regulations around data privacy.

Michael McEvoy has played a key role in this matter, having helped lead the UK Commissioner’s investigation into the scandal and later, in his current role as BC Information and Privacy Commissioner, joining the Federal Privacy Commissioner to investigate the Canadian angle of the story.

In this session, he discusses his personal involvement as an investigator in the scandal, the resulting lessons he learned, and, critically, where we go from here. The Commissioner will discuss the importance of giving regulators the tools they need to hold the social media giants of our day to account.

**Michael McEvoy** was appointed Information and Privacy Commissioner for BC by unanimous motion of the Legislative Assembly. He began his six-year term as an independent Officer of the Legislature on April 1, 2018. Prior to his appointment, he was seconded from his position as Deputy Commissioner at the OIPC to the Information Commissioner’s Office in the UK, where he helped lead an investigation into Cambridge Analytica and Facebook. Commissioner McEvoy served in local government for 12 years before joining the OIPC in 2007. He obtained a Juris Doctorate from the University of Manitoba and a Bachelor of Arts from the University of Winnipeg. He has been a member of the Law Society of British Columbia since 1986.
Janet Cummings has been practicing within the Information Management field for 20+ years in the federal, provincial, and municipal sectors. She has been providing access and privacy services under Alberta’s Freedom of Information and Protection of Privacy (FOIP) Act since 2003 for provincial and municipal public bodies. Currently, Janet is an Access and Privacy Advisor who provides access and privacy services for Service Alberta and three other client ministries: Agriculture and Forestry, Culture and Tourism, and Seniors and Housing. In 2016, Janet was instrumental in creating paid intern positions within the FOIP unit at Alberta Education. Her ground breaking advocacy, support, and supervision of IAPP program intern students resulted in successful learning opportunities for students entering Information Rights Administration profession. Janet’s work and success was repeated by numerous GoA departments that eventually resulted in 20 IAPP students being engaged in paid internships. Her positive efforts set the stage to establish formal paid intern programs within the GoA and Federal Government of Canada. The 2019 IAPP Program Award recognizes Janet’s work in establishing a successful pilot paid intern program benefiting IAPP students and helping to strengthen Canada’s Information Rights Profession.

Cara-Lynn Stelmack, Director, Mediation and Investigations, began her career in access and privacy 20 years ago with the Calgary Police Service. She has also acted as a consultant in the public and private sectors on a variety of issues, including in policy development, as legal counsel and as a privacy officer. Cara was one of the founding members of the Canadian Bar Association, Privacy and Access Law Subsection for Southern Alberta, worked with Service Alberta in the creation of an information bulletin and forms with respect to law enforcement and the FOIP Act. Prior to joining the field of access and privacy, she practiced civil litigation. Cara has been with the OIPC since 2011, and joined the senior leadership team in her current capacity in January 2014 where she is responsible for the mediation and investigation processes. The 2019 IAPP Program Award recognizes the significant and positive contribution that Cara has provided to the IAPP program as a subject matter expert who authored privacy curriculum for the IAPP program and worked as an online IAPP program instructor.

The Faculty of Extension is honored to present a posthumous 2019 Access and Privacy Award to Willie Grieve for his outstanding leadership, support and contribution to the University of Alberta’s Information Access and Protection of Privacy (IAPP) Program and annual Access and Privacy Conference. As VP Regulatory at TELUS, Willie assigned a TELUS legal staff member to write IAPP program privacy course curriculum. Additionally, Willie assisted the IAPP Program to launch the first annual Access and Privacy Conference at the TELUS Centre for Excellence in 2003. He was keynote speaker at the 2008 Conference where he spoke as Chair of the Alberta Utilities Commission on the topic “Privacy Issues in the Consultation Process.” As a leading lawyer and regulator Willie was a force in the community. He was recognized widely as the gold standard of regulatory excellence whose adjudicator decisions were a model of clarity. Willie passed away on November 20, 2018 at the age of 65.

Cara-Lynn Stelmack, Director, Mediation and Investigations, began her career in access and privacy 20 years ago with the Calgary Police Service. She has also acted as a consultant in the public and private sectors on a variety of issues, including in policy development, as legal counsel and as a privacy officer. Cara was one of the founding members of the Canadian Bar Association, Privacy and Access Law Subsection for Southern Alberta, worked with Service Alberta in the creation of an information bulletin and forms with respect to law enforcement and the FOIP Act. Prior to joining the field of access and privacy, she practiced civil litigation. Cara has been with the OIPC since 2011, and joined the senior leadership team in her current capacity in January 2014 where she is responsible for the mediation and investigation processes. The 2019 IAPP Program Award recognizes the significant and positive contribution that Cara has provided to the IAPP program as a subject matter expert who authored privacy curriculum for the IAPP program and worked as an online IAPP program instructor.
SESSION G
The 4 PROs of Proactive Disclosure: Implications and Benefits
David Watts

Explore the Pro-D perspective, process, prospects, and possibilities in this presentation based on the Government of Alberta’s only initiative and unit set up solely for the release of information outside of the requester-driven FOIP Access process.

Pro-D began as an imaging project to meet demand for scientific/technical information that was overwhelming to advisors using a hands-on, made-to-measure approach while meeting the criteria of FOIP and other legislation. It became a foundational routine disclosure joint initiative of Environment Records and FOIP, then a freestanding interdisciplinary unit. With a further re-organization, it became part of Enterprise Information Management, auditing and working jointly with business areas in optimizing their information assets.

With a 14-year track record in multiple modes of delivery, Pro-D can offer your office or enterprise a low-stress and user-friendly approach to IM.

David Watts is in his 15th year with the Government of Alberta, following a past life of 26 years in education at all levels, from preschool to university. Twelve of his years in government were spent leading Alberta Environment and Parks Proactive Disclosure program, the only of its kind in Alberta and possibly in any provincial public administration in Canada.

With the integration of Government of Alberta’s Information Services under a single ministry, David is now in the Environment and Resources Sector of Service Alberta, where he will be working on training, drawing on his experience in the classroom, and bringing a Pro-D awareness along with other strands that make up a comprehensive approach to IM.

David has been a published writer for 38 years, winning awards from the Edmonton Journal, Roy C. Hill Foundation, and the University of Calgary. He was the recipient of the 2018 Access and Privacy Award from the University Alberta. This prestigious award was presented at the University’s annual national conference, where David has been a regular participant and contributor. David is now working on his third book, developing the theme on which he spoke at the 2016 Conference (“Balance of Power, Balance of Brain”), and on a second edition of his 2018 book, Canadian Encounters of a Human Kind.
SESSION H
Health Information Act Mandatory Breach Notification: The First Year
Rachel Hayward and Duncan Worden

On August 31, 2018, the mandatory breach notification provisions under Alberta’s Health Information Act (HIA) came into force. Gain an overview of those amendments, as well as the new offence provisions that were established, and learn about the impacts these changes are having in the health sector and on Albertans who now have a right to be notified when their health information has been breached. Presenters will also discuss the volume of breaches being reported, the types of breaches seen in the health sector, and how Alberta Health and the Office of the Information and Privacy Commissioner are handling the influx of breach reports received.

Rachel Hayward (please see Page 19)

Duncan Worden, Director, Health Information Act Policy, Privacy and Security, Alberta Health, Government of Alberta, joined the ministry in 2012 where he has held a variety of roles. Duncan has a background in public administration and has work experience related to inter-governmental information sharing, public health surveillance, and electronic health initiatives. His work currently focuses on the privacy and security issues in the health sector and health information management policy.

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TEAM MEMBERS:
GREG PLESTER  |  REBECCA KOS  |  YVON PREFONTAINE  |  BRENDAN DZIOBA

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SESSION 1
Workplace Harassment Allegation Investigations: Access and Privacy Processes, Checks, and Balances
Joan Dunlop and Wade King

Join our experts as they discuss the concept of safe disclosure in complaints management, provide a high-level overview of the investigation process, and discuss strategies to protect privacy and manage access and privacy expectations.

Joan Dunlop joined Cenera in 2011. Previously, she spent several years as an analyst administering the Alberta Freedom of Information and Protection of Privacy (FOIP) Act, which inspired her interest in the world of access, privacy, and information management. As part of a team of Privacy and Information Management experts at Cenera, Joan works in a dynamic project environment delivering Alberta’s Privacy and Access Training Program for public bodies, as well as conducting privacy gap assessments, privacy impact assessments, privacy and security investigations, and workplace investigations. Joan also works developing privacy and information security policy, and designing and delivering access, privacy, information management, and investigations training in Alberta, Saskatchewan, British Columbia, Yukon, and in multiple private-sector and health jurisdictions. Since January 2018, Joan has been the Lead Investigator for Deloitte’s Interim Harassment and Discrimination Complaints Program, which is the external provider to the City of Edmonton.

Wade King, is the Director of Safe Disclosure and Human Rights at the University of Alberta. Having subject matter expertise in both human rights and disclosure practices, Wade has been at the forefront of implementing disclosure programs that both create a “safe” experience for those reporting concerns and enable organizations to address wrongdoings.

Currently, Wade is a Director (and past-President) of the Canadian Association for the Prevention of Discrimination and Harassment in Higher Education; an Awards Committee Member of the John Humphrey Centre for Peace and Human Rights; and a Director of the Edmonton Business Diversity Network. He is also a past-President of the Pride Centre of Edmonton.

A popular speaker and educator, Wade has presented to numerous national audiences, including the MS Society, the Canadian Access and Privacy Association (CAPA), the Access and Privacy Conference (University of Alberta’s Faculty of Extension), and the Canadian Association of University Business Officers (CAUBO). He has recently presented sessions for the CPA Alberta Assist program on the topics of bullying and sexual harassment.
SESSION J
Creating a Healthy Workplace During a Time of Operational Change in Public Bodies: 5 Keys to Stress Reduction for Information Rights Administrative Professionals
Dr. Thomas Barker

This interactive workshop focuses on health and wellness for those working in the information access and privacy field. Learn how to reduce stress in times of operational changes in public bodies, as you explore issues such as understanding stress risks; self-care and professional growth; strengths of a team; utilizing work support groups; using employer-provided health and wellness supports; and communication and leadership.

Dr. Thomas Barker is a professor of Communication in the Faculty of Extension at the University of Alberta. He is the Project Lead for the Healthy Workplaces for Helping Professions project, funded by the OHS Futures Program of the Alberta Ministry of Labour. Dr. Barker has been engaged with the Alberta non-profit human-services sector since 2011. His research work focuses on communication issues in public health, risk communication, and community engagement.
SESSION K

Risks, Threats, and Security: Safeguarding Your Data and IT Systems With Cutting-Edge Technology
Clinton M. Beck

No one likes being the victim of a theft—whether the theft involves the break and entry of your home or a robbery of your company or organization. What measures can you take to protect yourself and your assets from a thief? Join security expert Clinton Beck as he shares his insights about the products, strategies, and technologies available for personal and asset security and robbery prevention.

Clinton M. Beck, President, Dragon’s Breath Security, is an award-winning entrepreneur with 35 years at the helm of jewelry and other successful businesses. His group of companies was the first in Western Canada to deploy defensive security programs. Dragon’s Breath Security aims to protect valuable personal and organization assets utilizing cutting-edge technology for preventing robbery. Dragon’s Breath has been featured on several media outlets, in stories that emphasize its innovative approach to security.

SESSION L

How To Avoid Having Your Electronic Devices Ruin Your Trip To/From the USA
Larry Kearley

This session will examine problems arising when crossing the border with your electronic devices. Join our expert Larry Kearley as he explores this growing problem and gives tips, best practices, and important “dos and don’ts” when crossing the Canada-U.S. border with your electronic devices.

Larry Kearley (please see Page 10)
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**Plenary Presentation**

**European Union Adequacy and Privacy and Data Protection**


Learn about the latest developments regarding Canada's adequacy status under European Union's data protection law, the General Data Protection Regulation. Find out what the progress has been to date, and get up-to-date on recent Parliamentary reports on privacy, as well as the national consultations on Digital and Data Transformation.

**Barbara Bucknell** is currently a Senior Policy Analyst with the Marketplace Framework Policy Branch, at Innovation, Science, and Economic Development Canada, in the Privacy and Data Protection Directorate. Barbara has worked in the privacy field for a number of years, covering the Office of the Privacy Commissioner of Canada, Treasury Board Secretariat, and the Organization for Economic Co-operation and Development (OECD). She has worked in investigations, research, and policy, and was closely involved in the review of the OECD Privacy Guidelines, which were revised in 2013. Barbara started off her professional life as a teacher, later joining the federal public service as a writer/editor, before being bitten by the privacy bug.

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More than 120 lawyers work together to provide a wide variety of legal services to businesses and institutions in corporate and commercial matters, litigation and dispute resolution, labour and employment, insurance, intellectual property, energy, occupational health and safety, privacy, professional regulatory and medical malpractice issues. Additionally, the firm provides private services to individuals, including estate planning services and real estate transactions. Field Law has lawyers called to the Alberta, Northwest Territories, Nunavut, Ontario, British Columbia, and Saskatchewan Bars.

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Brownlee LLP is a mid-sized, regional law firm providing the breadth and depth of service of a full-service law firm across parts of Western Canada and the North. Through our offices in Calgary and Edmonton, we provide advice and services to clients located throughout Alberta, Saskatchewan, the Yukon, Nunavut, and Northwest Territories. With extensive and long-standing practices in almost all legal disciplines, Civil Litigation, Municipal and Administrative Law, and Corporate–Commercial Law remain the cornerstones and core strengths upon which we continue to build extensive specialized and unique practice areas.
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Microsoft Canada is equally passionate about committing to Canadian communities. Since its inception, Microsoft Canada has had a corporate giving philosophy that goes beyond financial donations to champion inventive forms of philanthropy.

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TELUS is Canada’s fastest-growing national telecommunications company, with $12.8 billion of annual revenue and 12.7 million subscriber connections, including 8.6 million wireless subscribers, 1.7 million high-speed Internet subscribers, 1.4 million residential network access lines and more than 1.0 million TELUS TV® customers. TELUS provides a wide range of communications products and services, including wireless, data, Internet protocol (IP), voice, television, entertainment, video and business process outsourcing services, and is Canada’s largest healthcare IT provider. In support of our philosophy to give where we live, TELUS, our team members, and retirees have contributed $482 million to charitable and not-for-profit organizations and volunteered more than 7.7 million hours of service to local communities since 2000.
CENERA is an Alberta-based Human Resource and Business Consulting firm with a global reach and affiliations worldwide. Cenera is a member of Career Partners International and Cornerstone, an international executive search association. Cenera’s consultants have a deep knowledge of records and information management, privacy legislation and security standards, practices, and implementation. They have successfully applied their knowledge in both the public and private sectors. Our broad and diverse experience allows us to offer a full range of privacy and information management assessment, design, implementation and training services.
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