



HELPSEEKER FIRST NATIONS DATA POLICY

POLICY DATE: JULY 1, 2020

This policy applies to First Nations communities with an active and established client relationship to HelpSeeker, and may be updated from time to time.

Helpseeker recognizes First Nations are in the best position to understand their own needs and govern their own information. The right of First Nations peoples to own, control, access, and possess information about their peoples is fundamentally tied to self-determination, and to the preservation and development of their culture.

RELATED POLICIES & DOCUMENTS

This policy document is written as a supplement to the [HelpSeeker Terms of Service](#) and [HelpSeeker Privacy Policy](#). This policy is also written in alignment with [OCAP®](#) principles. First Nations clients will also sign a data-sharing agreement with HelpSeeker prior to engaging in working relationships regarding data stewardship.

1. Ownership

- 1.1. First Nations communities who provide data to HelpSeeker own that data collectively, the same way an individual owns their personal data. Therefore, HelpSeeker maintains rights over its compiled database as articulated in HelpSeeker's [Terms of Service](#), but does not retain rights over First Nations-owned data itself, as that data belongs to the First Nations community. The First Nation may, however, provide license rights and consent to HelpSeeker as a third-party data steward to act on their behalf through Data Sharing Agreements.

2. Control

- 2.1. **Research Projects.** First Nations, their communities, and representative bodies have the right to control the research and information management processes that impact them, including the research and data collection conducted by HelpSeeker, and including all stages of a particular research project - from start to finish. This principle extends to the control of resources and review



processes, the planning process, management of the information and so on. HelpSeeker will seek consent from First Nations before engaging in any research activity using First Nations-owned data, and will actively consult with First Nations through the entire research process. In cases where a research project might be undertaken in partnership with First Nations, First Nations may withdraw their data at any time from these analyses. When working with First Nations data or any linked data involving First Nations, HelpSeeker will work at the discretion of, and in consultation with, the First Nation. First Nations will be provided with the opportunity to review research results and to comment on such results prior to publication.

- 2.2. **Software Platform.** The Helpseeker.org and navigation apps were developed, and are owned, by HelpSeeker. We maintain all intellectual property rights pertaining to the apps, and the right to analyze trends across the user base that interacts with the apps.

3. Access

- 3.1. First Nations must have access to information and data about themselves and their communities regardless of where it is held. The principle of access also refers to the right of First Nations communities and organizations to manage and make decisions regarding access to their collective information. If First Nations would like to work with HelpSeeker to map services into the HelpSeeker apps, First Nations would have access to their data and reports at any time through the HelpSeeker platform. Upon request, HelpSeeker can provide, edit, suppress, remove, or delete the data used in HelpSeeker's services. Because data is collectively owned by First Nations, any member of the First Nation can make this request; in such a case, HelpSeeker would bring the request to the lead First Nations partner for information. HelpSeeker will endeavour to make changes within 72 hours of receipt of the requested changes. No secondary access will be granted without consent of the First Nation.

4. Privacy



- 4.1. **Community Privacy.** HelpSeeker's apps do not collect any personal information; the data captured is based on "interactions" only. There is however an ability to generate heatmaps to show where interactions are occurring, which includes a Google Maps integration that does include First Nations territories. To manage this risk to Community Privacy, HelpSeeker will seek permission from First Nations to include heat maps in our data dashboards with municipalities or other license holders. If that permission is not provided, these heat maps would not be provided and would remain suppressed from these parties.
- 4.2. **Personal Privacy.** HelpSeeker's privacy terms outline our alignment with federal and provincial legislation. Beyond these requirements, the app does not collect any personal information from end users. In the case of service providers who are mapped, HelpSeeker does not map any services in First Nations communities (Northern communities, Reserves, Metis Settlements). Outside First Nations communities, for instance urban centres, our aim is to develop an easy to use platform for people looking for help to connect to services. Ideally, this would include services provided by Indigenous organizations. We do map Open Data on our platform where that information already exists on the Internet or Open Source datasets - such as the Canada Revenue Agency Charities List. However, if any organization - including Indigenous organizations - do not wish to be mapped, they are able to remove their listing from the platform. They can do so themselves or provide a request to info@HelpSeeker.org and this will be completed within 24 hours.

5. Possession

- 5.1. While ownership identifies the relationship between a people and their information in principle, possession or stewardship is more concrete: it refers to the physical control of data. Possession is the mechanism by which ownership can be asserted and protected. HelpSeeker will engage in data stewardship (core functions include data collection, access, holdings and management, data linkages, analysis, visualization, protection, dissemination, and consumption) on behalf of the First Nation only with the consent and



oversight of the First Nation. This would require a written agreement through which the First Nation would engage HelpSeeker to perform this work for them.

6. Termination

- 6.1. First Nations can terminate the relationship for any reason.
- 6.2. Upon termination of a data-sharing agreement, all applicable First Nations data will be removed from the database and provided to the First Nations in CSV format.

7. Capacity Building

- 7.1. Within its means, HelpSeeker will endeavour to provide capacity-building and educational opportunities to First Nations communities in information management, analysis, etc. This includes monthly webinars, monthly account management meetings, access to data dashboards and canned reports for the First Nations community.