Health Sciences Placement Network
Réseau de gestion des stages en sciences de la santé

Identified Purposes and Handling of Personal Information and Personal Health Information FOR INSTRUCTORS in HSPnet

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Background

The Health Sciences Placement Network (HSPnet) is a secure web-enabled application that is managed on behalf of several jurisdictions across Canada. The HSPnet database contains information about students in clinical placements within health agencies, plus the instructors and/or preceptors who supervise their placement. Instructors may provide consent for their educational program to use (but not disclose) their personal information and personal health information within HSPnet for the purpose of coordinating clinical placements for students under the instructor's responsibility. This document provides a summary of the national HSPnet Policies on Privacy, Security and Data Access, relating to the protection of personal information within HSPnet. The complete Policies can be viewed on the HSPnet Knowledge Base.

Note that instructors are not required to provide consent for their educational program to use or disclose their contact information only (name, title, and office phone/email), as this is considered to be the business information of the educational program so long as it is used/disclosed for purposes consistent with the instructor's role.

Collection, Use, and Disclosure of Personal Information (PI) and Personal Health Information (PHI) in HSPnet

HSPnet Policies ensure that PI and PHI in HSPnet:

- Are collected, used, and disclosed only for purposes consistent with coordinating clinical placements assigned to an instructor;
- Cannot be used or disclosed without the consent of the instructor whose PI or PHI is to be collected; and
- Are used by or disclosed only to authorized individuals on a need-to-know basis, and by/to staff involved in clinical placements within an educational program or placement site. PHI is never disclosed via HSPnet to users who are external to the instructor's educational program.

Instructor PI Collected *May include any or all of:*	**Uses of PI** *BY authorized users only within Instructor's Educational Program*	**Disclosure of PI** *TO authorized users only within the Placement Site being asked to accept the Student/Instructor*
• Instructor home contact information (address, phone, or email)* • Instructor employee number (to uniquely identify an individual)	• To contact instructors regarding placement arrangements or status, or regarding urgent issues such as labour disruption at the placement destination • To generate placement lists, confirmation notices and schedules	Instructor name and office contact information may be disclosed immediately upon sending a placement request, for the purpose of facilitating placement arrangements (orientation, scheduling) and as a record of instructors on Site. Home contact information may be disclosed with consent, if preferred by the instructor or if the school does not provide an office.
Placement Prerequisites as required by Placement Sites (e.g. criminal records check, CPR or other certifications)	To track instructor compliance with each site's published requirements for criminal records check, CPR certification, etc.	*Not disclosed under any circumstances*
Instructor Profile of educational or work history relevant to placement assignments	To facilitate a good fit between the Instructor and Placement Site, learning experiences needed by students, and student/preceptor to be assigned.	

* Home contact information (phone, personal email) may be used internally by staff of the educational program but should not be disclosed to external recipients without the Instructor's consent

Instructor PHI Collected *May include any or all of:*	**Uses of PHI** *BY authorized users only within Instructor's Educational Program*	**Disclosure of PHI**
Status of indicators for safety and/or infection control as required by Placement Sites prior to accepting students: • Information on an instructor's immunity or immunization status for vaccine-preventable diseases such as Varicella, Polio, Diptheria/Tetanus, Influenza, and Measles/Mumps or Rubella • Information on Tuberculosis status including TB test and/or chest X-ray results	To track status of an instructor's eligibility according to the requirements of Receiving Agency sites where students may be placed	*Not disclosed under any circumstances*

Safeguards

- The accuracy and completeness of personal information within HSPnet is maintained through the use of system tools such as mandatory fields and formatting rules, and through periodic review of data quality to identify the need for interventions including user training and system modifications.
- HSPnet data is physically and logically secured in accordance with industry standards and best practices, including enforcement of strict rules for physical security and backups, password protection at all points of access, and use of anti-virus software, firewall protection, and data encryption.
- Periodic audits of HSPnet transactions are carried out to ensure there are no problems and/or gaps in the user interface that might permit inappropriate access to or update of data.

Openness, Access, and Challenging Compliance

- An individual may access their own information as well as a complete description of the type of PI or PHI collected and the Identified Purposes for using or disclosing the information. Such requests can be made in writing by the individual to the HSPnet Privacy Officer and/or to the local Privacy Officer within the individual's jurisdiction (contact information for each province or jurisdiction is available on the HSPnet Knowledge Base
- An individual may request changes to their PI or PHI contained in HSPnet, or may register a complaint or challenge regarding the handling of their information in HSPnet by submitting a request in writing to HSPnet Support or their local Provincial Privacy Officer.