HSPnet – Alberta

PRIVACY IMPACT ASSESSMENT

PIA

Submitted by Alberta Health Services on behalf of the Alberta Community of HSPnet-AB User Agencies

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Privacy Impact Assessment: Full Questionnaire

Privacy impact assessments must be submitted to the Information and Privacy Commissioner with a covering letter from the Head of the FOIP public body or the CEO of the HIA custodian.

Project[1] Information	
Project Name: HSPnet-Alberta Implementation	**Date:** May 11, 2017
Organization[2]: Alberta Health Services on behalf of the Alberta Community of HSPnet-AB User Agencies **These Agencies, are required to adhere to the HSPnet National Alliance Steering Committee Policies whereby a formal PIA process will be undertaken in each province as a best practice, regardless of whether a PIA is mandatory or not.**	

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[1] Throughout this questionnaire, the term 'project' is intended to subsume the words 'scheme', 'program', 'initiative', 'application' and 'system', as well as any other word or term that refers to a defined course of endeavor.

[2] Throughout this questionnaire, the term 'organization' is used to refer to a public body under the *Freedom of Information and Protection of Privacy Act* or a custodian under the *Health Information Act*. When appropriate, the term may also refer to an affiliate under the *Health Information Act*.

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Alberta Ministry of Health supports and funds the Health Sciences Placement network (HSPnet), a software program used by Alberta Post-Secondary Institutions (PSIs) and Healthcare agencies to coordinate and track clinical student placements.

In compliance with HSPnet National Alliance Steering Committee Policies, Alberta Health Services, as a custodian under the *Health Information Act* took the lead in preparing this Privacy Impact Assessment.

A: Organizational Privacy Management					
PREVIOUS PIA SUBMISSIONS					
#	Question	*yes*	***Yes and No*** *(partial, incomplete, in preparation*	*no*	*n/a*	***Enc. Ref.***
A1a	Has organizational privacy management information for questions A2 through A7 previously been provided with another PIA?	☒	☐	☐	☐	**See Appendix A**

Appendix A: Privacy Impact Assessment; May 14, 2008

Privacy Impact Assessment for HSPnet in BC

Note/Elaboration: Please refer to Alberta Health Service's Organizational Privacy Management (Part A) Privacy Impact Assessment accepted by the Office of the Information and Privacy Commissioner May 14, 2008.

#	Question	*yes*	***Yes and No*** *(partial, incomplete, in preparation*	*no*	*n/a*	***Enc. Ref.***
A1b	If so, has any of this information changed since the previous PIA was submitted? *If "No", please provide the title and date of the previous PIA and proceed to section B of the questionnaire.*	☒	☐	☐	☐	**See Appendix A**

Appendix A: Privacy Impact Assessment; May 14, 2008

Note/Elaboration:
Changes since the submission of the Privacy Impact Assessment (0047) Appendix A:

- The former National HSPnet Steering Committee has transitioned to the HSPnet National Alliance Steering Committee.
- Alberta has formed a provincial Data Stewardship Committee
- Ownership of HSPnet has transitioned from the British Columbia Academic Health Council (BCAHC) to the Provincial Health Services Authority (PHSA) of British Colombia

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B: Project Privacy Management					
PROJECT DESCRIPTION					
#	*Question*	*yes*	***Yes and No*** *(partial, incomplete, in preparation)*	*no*	*n/a*	*Enc. Ref.*
B1	Has a summary of the proposed project been prepared, including a description of the needs behind the development of the project, and how the proposed project will meet those needs? *If so, please enclose.*	☒	☐	☐	☐	**See Appendix B1**

Appendix B 1: HSPnet Overview & Benefits

Note/Elaboration:

Summary

HSPnet is a secure web-enabled application that contains information about students in health science and allied health science practice education placements within both public and private health agencies. Clinical placements are mandatory in order for future health practitioners to meet the training and licensure requirements of regulatory bodies. Alberta employs this comprehensive system to meet the following goals in practice education provisioning:

- To increase the availability and quality of practice education opportunities for health science and allied health science students;
- To streamline the processes and improve the coordination and the communication between agencies that either place or receive students for placement;
- To identify untapped opportunities for placement and provide access to a greater range of placement settings (i.e. rural and community placements);
- To showcase the priority of practice education in Alberta.

HSPnet is widely used across Canada in eight provinces: Alberta, British Columbia, Saskatchewan, Manitoba, Ontario, Quebec, Nova Scotia, Newfoundland and Labrador. Alberta is the third highest Canadian HSPnet user. In 2015/2016 Alberta had 168 educational programs using HSPnet.

HSPnet allows for the provision of a coordinated system that improves student placements for health sciences and allied health disciplines in these provinces. This web-enabled application will support and streamline processes for:

- Initiating, tracking and processing (accepting or declining) clinical placement requests among provincial Placing Agencies and Receiving Agencies;
- Reporting and analysis of placement activities (within and across programs, agencies, and disciplines) to support workforce development planning and initiatives to increase placement capacity;
- Facilitating evaluation of placement outcomes to ensure the best educational experience for health sciences students;

HSPnet is managed within each province through structures and roles that oversee local management, policy, and data stewardship and user coordination. Each province determines the specific legislative authorities that apply to the activities supported by HSPnet and the collection, use and disclosure of the information in that jurisdiction. HSPnet is designed as a principles-based system intending to meet the highest standard including the privacy legislation that applies in each province.

Background

HSPnet was developed through funding from the Ministry of Health Services for the British Columbia Academic Health Council (BCAHC) in 2003. In January 2014, ownership of HSPnet transitioned to the Provincial Health Services Authority (PHSA) of British Colombia. HSPnet use has expanded to include other Canadian provinces and operates through a cost sharing alliance of these provinces. Under this Alliance, each province is authorized to access the HSPnet application and associated documentation at no charge in exchange for sharing the ongoing costs of operating and enhancing the system for the benefit of all users. The HSPnet National Alliance Steering Committee guides HSPnet strategic direction, ensures the efficient operation of the shared infrastructure and supports the effective development and growth of HSPnet in each member province.

Governance and Organization

British Columbia's Provincial Health Service Authority (PHSA) acts as the 'Application Service Provider' to all provinces and agencies using HSPnet. PHSA maintains a comprehensive privacy and security program as encompassed by HSPnet Policies, Section 3 on Privacy, Security and Data Access (see Appendix B2).

All provinces and agencies that use HSPnet will adopt their Policies on Privacy, Security and Data Access. These policies are overseen by the HSPnet National Alliance Steering Committee.

HSPnet has a designated National Privacy Officer and that individual coordinates activities across all provinces and identifies trends or problems that may require review and/or action by the HSPnet National Alliance. In addition, each province has a named provincial Privacy Officer that performs a similar role within the member provinces. The provincial HSPnet Privacy Officer is accountable to that province's local HSPnet Data Stewardship Committee. The Alberta HSPnet Privacy Officer responds to inquiries specific to HSPnet-AB and local use of the HSPnet application.

Each Province has established a local Data Steward or Data Stewardship Committee responsible for application and monitoring of the Policies and local processes, as needed, to ensure the integrity of user data, protection of privacy and security of personal information and appropriate use of data in support of business objectives. The Data Stewardship Committee for HSPnet-AB advises on policy and processes that ensure the integrity and quality of Alberta user data, protects the privacy and security of personal information, and enables innovative, effective and appropriate use of data in support of health science practice education in Alberta. This group pro-actively works to develop and maintain a culture within HSPnet AB users that values and preserves data quality. The HSPnet-AB Data Stewardship Committee (DSC) is accountable to Alberta Health (AH) the Lead Agency for HSPnet in Alberta.

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<u>HSPnet Alberta</u>

HSPnet–AB is used in collaboration with the province's PSI health sciences and allied health programs, clinical placement locations, associated agencies, Alberta Ministry of Health and Alberta Advanced Education. These stakeholders work together as a group to use HSPnet to coordinate and track student placements. Students to be placed are generally enrolled in PSIs within Alberta. However, HSPnet Placing and Receiving Agencies in Alberta can also record out of province student placements.

Provincial PSI's use HSPnet to maintain, manage and record:
• Student information (with students' consent)
• Course information and outlines identifying learning objectives
   o Course hours
   o Date ranges
   o Discipline
   o Program year
• Available placement destinations (non HSPnet users only)
• Names and contact information of placing agency representatives
• Placement requirements e.g.
   o Immunization requirements
   o Criminal Record Checks
   o Information & Privacy training
Provincial Receiving Agencies (e.g. Alberta Health Services and Covenant Health) in Alberta use HSPnet to:
• Manage the agency database
   o Identify, build and monitor destinations suitable for student learning
• Create and manage destination profiles i.e.
   o Number of students the destination can support
   o Type and number of disciplines
   o Type of learning objectives can be met based on the patient population
   o Names and contact information of receiving agency representatives e.g. preceptor/supervisor
• List Placement prerequisites
   o Immunization requirements
   o Criminal Record Checks
   o Information & Privacy training
   o Specific destination requirements
• Confirm location of a student in case of emergency or outbreak
• Run reports
   o Analyze data to monitor and identify placement capacity

#	Question	yes	Yes and No *(partial, incomplete, in preparation)*	no	n/a	Enc. Ref.
B2	Has a listing of all personal information or data elements to be collected, used or disclosed in the project been prepared? *If so, please enclose.*	☒	☐	☐	☐	**See Appendix B2 & B3**

Appendix B2: National HSPnet Policies, Section 3.0-3.6 Privacy, Security & Data Access
Appendix B3: Identified Purposes and Handling of Personal Information and Personal Health Information in HSPnet.

Note/Elaboration: The HSPnet Data Users Table (Appendix B3) provides a detailed description of the personal data elements stored in HSPnet. It also includes details on the specified data uses, levels of identification and disclosure recipients.

Personal information is collected by Placing Agencies at the time of registration of students into an educational program. A subset of this information, suitable for coordinating placements as required by the student's educational program, may be entered into HSPnet and used/disclosed as described in this document.

This information is used by the Placing Agency as a status indicator of a student's compliance with the safety and/or infection control prerequisites of Receiving Agencies. Instructors are required to meet the same clinical requirements as students.

Use of Personal Information

The PSI (Placing Agency) collects personal information (e.g. criminal records check, immunization status and Occupational Health and Safety certifications) to create and maintain a student profile in HSPnet. In general, this information is collected by Placing Agencies from their registered students at the time of their enrollment/registration into the education program. This student information is updated throughout their educational program, as required, to prepare for an upcoming placement (s). Personal information may be collected from external agencies for entry into HSPnet, but only with the specific consent of the student. For example, a student may authorize a Criminal Records Check and the disclosure of its results to their educational program. Educational program staff would then enter those results into HSPnet for the sole purpose of tracking the student's eligibility for placement against the Receiving Agencies' contractual prerequisites for accepting students. This information is used as a status indicator of a student's compliance with the safety and/or infection control prerequisites of Receiving Agencies.

The Placement Process

All personal student information is withheld when placement requests are sent to the Receiving Agency from the Placing Agency. Once the request is accepted and confirmed by the Receiving Agency, the student name will be released. Student contact information such as address and telephone number is withheld. At the discretion of the PSI Placement Coordinator, a student's name may only be released prior to acceptance where there is a demonstrated need for this information in order to facilitate consideration of the request. If contact with the student is necessary prior to accepting a placement request (e.g. for interview purposes), the student's name may be released to authorized individuals within the Receiving Agency for the sole purpose of arranging and conducting a student interview.

HSPnet Technical Requirements, Security, Auditing

User Authorization

An active user account, at the level of Local Administrator, must be held by a named individual who will access the Web Service or be responsible for its use. Shared user accounts are not permitted as per the HSPnet National Policies. Each user account must include a non-shared email address for secure delivery of passwords and contact or escalation of issues by Help Desk. (See Appendices B9)

The technical requirements for using HSPnet are an internet connected computer with Microsoft® Internet Explorer, an active school e-mail account, and Adobe® Reader. There is no software to install or maintain. Authorized users can access HSPnet from any internet connected computer.

HSPnet transactions are encrypted and logged for audit purposes. Multi-level security ensures that only authorized users can view placement information, as appropriate for their role within an agency.

#	Question	yes	**Yes and No** *(partial, incomplete, in preparation*	no	n/a	*Enc. Ref.*
B3	Have diagrams been prepared depicting the flow of personal information for this project? *If so, please enclose*.	☒	☐	☐	☐	**See Appendix B4**

Appendix B4: HSPnet Functions

***Note/Elaboration*:** The following documents are included in this PIA with respect to information flow –
• HSPnet Functions Diagram
• HSPnet Policy Application Guide – Consent Implementation Options – Overview Information Flow along with Details

#	Question	yes	**Yes and No** *(partial, incomplete, in preparation*	no	n/a	*Enc. Ref.*
B4	Have documents been prepared showing which persons, positions, or employee categories will have access to which personal information? *If so, please enclose*	☒	☐	☐	☐	**See Appendix B5a**

Appendix B5a: Managing User Access

***Note/Elaboration*:** HSPnet Policies 3.2 and 3.6 define the limits of individual access, both for routine transaction-based activities and when seeking aggregate or summary data. The HSPnet Director applies these policies and the Data Access Guidelines in Policy 3.6 to approve or decline requests for ongoing access (a new user ID) or for access to reports or data extracts. Policy 3.2 outlines the rules by which individuals can access identifiable personal information in HSPnet. These rules limit access to personal information that is appropriate given the individual's organizational role, involvement in the student placement process and associated 'need to know'.

• **User Role** – determines which functions and screens can be accessed by a user. For example, senior managers may be provided with access to Report screens only (which produce aggregate data), whereas Placing and Receiving Coordinators can access screens that display individual placements within their program areas and the students/staff assigned to them.

• **User Level** – determines whether a user has read-only rights (e.g. an instructor), create/edit rights as required by Placing and Receiving Coordinators, or Local

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Administrator rights which are granted to a limited number of users within each agency/program for the purposes of setup table management and for creating and maintaining User ID's within their areas of responsibility.

- **Access Rights** – determine the PSI's department and educational program(s) that may be accessed by Placing Agency staff, or the site, service and destination(s) that may be accessed by Receiving Agency staff when viewing incoming requests.

	AUTHORITY FOR COLLECTION, USE AND DISCLOSURE					
#	*Question*	*yes*	***Yes and No*** *(partial, incomplete, in preparation*	*no*	*n/a*	***Enc. Ref.***
B5	Has the legal authority for the collection, use and disclosure of all personal information for this project been established? *Please enclose relevant documentation.*	☒	☐	☐	☐	**See Appendix B2 & B5b**

Appendix B2: National HSPnet Policies, Section 3.0-3.6 Privacy, Security & Data Access
Appendix B5b: Policy Application Guide:
- Policy 3.2 Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure.

Note/Elaboration: Informed student consent, as documented by the attached consent form (see Appendix B6 for details), is the basis for the collection, use and disclosure of personal information in HSPnet in all provinces. This approach was chosen as a 'best practice' to ensure a high standard of privacy protection and to allow the system to be implemented effectively across jurisdictions with differing privacy legislation.

Information collected, used and disclosed will be in compliance with Alberta Legislation.

No health information is shared between agencies. PSIs catalogue the immunization status of students for the purpose of determining their eligibility for practicum. This does not fall under the Health Information Act (HIA) as the intended use of this information is not to provide healthcare. Immunization status in this instance is defined as personal information.

Freedom of Information and Protection of Privacy Act* (FOIP)* –
Collection: Section 33(c); **Use**: Section 39(1)(a)(b); **Disclosure**: 40(1)(c)(d)(l)

***Post-Secondary Learning Act* –**
Collection/Use/Disclosure: Sections 65

There are no plans to routinely disclose individually identifying information from HSPnet. Any non-routine disclosure of personal information would be non-compliant with legislation.

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#	Question	yes	**Yes and No** *(partial, incomplete, in preparation)*	no	n/a	**Enc. Ref.**
B6	Does individual consent provide the primary basis for the collection, use and disclosure of personal information for this project?	☒	☐	☐	☐	**See Appendix B 5c**

Appendix B 5c: Consent form for use and disclosure of Student Information.

*Note/Elaboration***:** As indicated in B5c, informed consent is obtained from all students whose personal information will be collected, used or disclosed via HSPnet.

Appendix B2, HSPnet Policy 3.2 requires a student consent process as documented by the 'Consent Form for Use and Disclosure of Personal Information'. This approach was chosen as a best practice to ensure a high standard of privacy protection and to allow HSPnet to be implemented effectively across jurisdictions with differing privacy legislation.

In general, personal information is collected by Placing Agencies from their registered students, as provided at the time of their enrollment/registration into the educational program and updated throughout their program, and/or during their educational program, as required, to prepare for an upcoming placement. As outlined in Appendix B2 Policy 3.3 and the HSPnet Data Sharing Agreement between the PHSA and each agency using HSPnet, personal information may be collected indirectly through data uploads obtained from Student Information Systems that are maintained by the student's educational program, containing information collected directly from students as noted above. Data uploads to HSPnet are subject to the same consent and other requirements of HSPnet Policies and are carried out within the specific requirements of the Data Sharing Agreement.

#	Question	yes	**Yes and No** *(partial, incomplete, in preparation)*	no	n/a	**Enc. Ref.**
B7	Have arrangements been made to provide full disclosure of all purposes for which personal information is collected? *Please elaborate.*	☒	☐	☐	☐	**See Appendix B 5c**

Appendix B 5c: Consent form for use and disclosure of Student Information.

*Note/Elaboration***:** The student consent references a handout entitled 'Identified Purposes and Handling of Personal Information in HSPnet' and is attached to the 'Consent Form for Use and Disclosure of Personal Information'. The consent also references HSPnet Policies on Privacy, Security and Data Access which are available to students on the HSPnet public website at www.hspcanada.net (see Appendix B 5c for details).

The purposes for which information is collected, used and disclosed are discussed with the student at the time of collection. 'Informed consent', based on receipt and acknowledgement of the Identified Purposes, must be obtained from the student prior to entering their personal information into HSPnet.

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Students have the right to request that the use and/or disclosure of their personal information in HSPnet be **restricted**. Such requests must be made in writing. If restriction of use precludes the use of HSPnet, they will be informed of the potential delays or other impacts of requesting that restriction.

A student may revoke their consent by submitting a written request to their educational program coordinator. Revocation of consent will not be effective for uses or disclosures already made as permitted by their prior consent.

The signed consent forms will be retained by the educational program of the PSI that enters the student's information into HSPnet for a minimum of seven years or longer, if required by the PSI's record retention policies.

Informed consent for any new purposes beyond the 'Identified Purposes' document will be obtained from the student before collecting their personal information, or prior to using their personal information if the new purpose applies to data already stored within HSPnet (*s*ee HSPnet Policy 3.2).

#	Question	yes	**Yes and No** *(partial, incomplete, in preparation)*	no	n/a	*Enc. Ref.*
B8	Have the purposes for which the personal information is collected been documented? *If so, please enclose.*	☒	☐	☐	☐	**See Appendix B3**

Appendix B 3: Identified Purposes and Handling of Personal Information and Personal Health Information in HSPnet.

***Note/Elaboration*:** Personal information will be collected, used and disclosed via HSPnet on a need-to-know basis only and for purposes consistent with identifying, coordinating and evaluating placements for students as per HSPnet Policy 3.2.1 (see Appendix B6 for details).

#	Question	yes	**Yes and No** *(partial, incomplete, in preparation)*	no	n/a	*Enc. Ref.*
B9	Is personal Information used exclusively for the identified purposes and for uses that an individual would reasonably consider consistent with those purposes?	☒	☐	☐	☐	**See Appendix B3**

Appendix B3: Identified Purposes and Handling of Personal Information and Personal Health Information in HSPnet.

***Note/Elaboration*:** Appendix B3 provides details on the uses of personal information, as summarized in the 'Identified Purposes' handout for students. Informed consent for any new purposes beyond the 'Identified Purposes' will be obtained from the student before collecting their personal information, or prior to using their personal information if the new purpose applies to data already stored within HSPnet.

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The HSPnet National Alliance Steering Committee is responsible for the annual review of the Identified Purposes document.

#	Question	yes	Yes and No *(partial, incomplete, in preparation)*	no	n/a	*Enc. Ref.*
B10	Will personal information collected or used in this project be disclosed to any persons who are not employees of the responsible organization?	☐	☐	☒	☐	**See Appendix B3**

Appendix B3: Identified Purposes and Handling of Personal Information and Personal Health Information in HSPnet.

Note/Elaboration: **No.** In general, a student's personal information is not released to the Receiving Agency until after the placement is accepted. At that time the PSI confirms the placement and releases the student name. On occasion, the PSI may release (on a need-to-know basis) a student's pertinent personal information (name only and summary profile of educational, work and/or placement experience history) prior to acceptance of the placement if this information is required by the Receiving Agency in order to consider the appropriateness of the request and/or to identify a suitable supervisor/preceptor or placement.

All releases of personal information, including release date and the authorized user's ID release, are tracked within HSPnet and this tracking information becomes a permanent part of the placement request record. Student information is only released with the written consent of the student.

#	Question	yes	Yes and No *(partial, incomplete, in preparation)*	no	n/a	*Enc. Ref.*
B11	Will this project involve the collection, use or disclosure of any personal information beyond Alberta's borders? *If so, please provide details*	☒	☐	☐	☐	**See Appendix B7**

Appendix B7: Guest Access for (non-user) Placing Agencies

Note/Elaboration: Occasionally, students are placed in Receiving Agencies located outside the province of the student's educational program. The PSI may release student information to these Receiving Agencies if the student has requested or agreed to the placement in another province. The release only occurs with the student's consent, as documented by the student's completion of an HSPnet consent form. In these situations, student information will only be disclosed to a non-Alberta Receiving Agency after the placement is confirmed unless released before acceptance on a need-to-know basis as referenced above.

At this time, non-Alberta agencies do not have online access to HSPnet-AB. Therefore, any disclosure of personal information to agencies outside of Alberta will only occur via fax, paper or e-mail according to pre-existing practices for coordinating placements outside of Alberta.

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#	Question	yes	Yes and No *(partial, incomplete, in preparation*	no	n/a	*Enc. Ref.*
B12	Has this project's potential risks to privacy been assessed? *If so, please provide documentation.*	☒	☐	☐	☐	**See Appendix A & B2**

Appendix A: Privacy Impact Assessment; May 14, 2008
Appendix B2: National HSPnet Policies

*Note/Elaboration***:**

#	Question	yes	Yes and No *(partial, incomplete, in preparation*	no	n/a	*Enc. Ref.*
B13	If potential risks to privacy have been identified, have means to avert or mitigate those risks been incorporated into the project design? *If so, please enclose.*	☒	☐	☐	☐	**See Appendix B2**

Appendix B 2: National HSPnet Policies

#	Question	yes	Yes and No *(partial, incomplete, in preparation*	no	n/a	*Enc. Ref.*
B14	Has a list of the key stakeholders that are users of HSPnet been provided in the PIA? *If so, please enclose.*	☒	☐	☐	☐	**See List Page 13**

Note/Elaboration: The following key stakeholders are the participating HSPnet agencies at the time of the PIA submission:

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Active Agencies Using HSPnet (Aug 25, 2016)

ABES College	Lakeland College
ABM College	Lethbridge University
Academy of Learning	LifeMark
Alberta Health and Safety Training Institute	MacEwan College
Alberta Health Services	Medical Reception College Ltd.
Ambulance Services	Medicine Hat College
Athabasca University	Mount Royal University
Bow Valley College	MTG Healthcare Academy
Carewest	Nightingale Academy
CDI College	NorQuest College
CGI College	Northern Alberta Institute of Technology
Chateau Three Hills	Northern Lakes College
Choice College	Portage College
CLI College	Professional Medical Associates
Columbia College	Red Deer College
Covenant Health	Reeves College
Department of National Defense	Robertson College
Emergency Services Academy	Royal Health Care Aide Training School
Excel Academy	SAIT Polytechnic
Flatline Response	Training Inc. Vocational School and
Grande Prairie Regional College	Employment Services
HCA Academy	University of Alberta
Heartbeat Training International/AOL	University of Calgary
Keyano College	University of Lethbridge

#	Question	yes	**Yes and No** *(partial, incomplete, in preparation*	no	n/a	*Enc. Ref.*
B15	Is project staff trained in the requirements for protecting personal information and aware of the relevant policies regarding breeches of security or confidentiality? *If so, please enclose.*	☒	☐	☐	☐	**See Appendix B2 & B 8**

Appendix B2: Section 6 Training and support
Appendix B8: HSPnet Training Course Outlines (List)

*Note/Elaboration***:** PHSA of British Columbia staff and contractors that have access to HSPnet are trained by the PHSA Privacy Officer on the privacy and security framework and upon completion of their training, sign an 'Agreement on Confidentiality and Rules of Conduct for HSPnet Service Providers' that guides the activities of System Administrators, Developers, and Help Desk staff. A copy of this agreement is included in Appendix B2 HSPnet policy 6.1.

All 'new' users will receive HSPnet training from an HSPnet trainer or a local trainer from their own organization (trained by HSPnet to deliver local training), or via e-Learning tools. The curriculum for all user levels includes an orientation to HSPnet Policies with specific instructions pertaining to individual user responsibilities (see Appendix B8 to view Course Descriptions).

A subset of HSPnet Policies is presented to new users as 'User Responsibilities in HSPnet' upon their first login and thereafter every 90 days when resetting their expired password.

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Ongoing training and communication occurs through a combination of procedural safeguards that enforce privacy requirements (e.g. screen prompts and online instructions), links from the application and website to privacy content in the HSPnet User Guide, user alerts on the HSPnet website (login page) and targeted messages to specific user groups or to individual users, as required.

Online, self-paced training resources are available to all HSPnet users for completing 'mandatory' topics (as prerequisites to receiving an HSPnet user ID).

Mandatory courses include:
- **Privacy and Security of Personal Information** - the handling and protection of information in HSPnet
- **Navigating HSPnet** - describes the major functions and processes of HSPnet.

Additional courses available (including refresher training):
- **HSPnet Overview** - provides an Overview of HSPnet background development and partnership history, and benefits to system users.
- **Introduction to HSPnet** – helpful background on HSPnet and its contribution to effective 'Practice Education Management' in the health sciences.
- **Functions and Navigation for DC's** – explains the role, responsibilities and functions of HSPnet users.
Completion of this e-Topic is **MANDATORY** for 'new' Destination Coordinators (DC).
- **Assigning Preceptor or Multiple Preceptors (DC)** – this e-Topic explains how to assign preceptor(s) in HSPnet placements.
- **Guide to Welcome Screen for DC – Welcome & Review, Alerts** – this training module provides a general overview of the Welcome Screen for Destination Coordinators. The overview includes preview screens, assigning a Preceptor and printing placement schedules
- **Activity Reports Wizard (All Users)** – this training module shows how to generate customized reports of placement activities within all of the HSPnet Access rights.
- **Quick Entry Screens (RC)** – this e-Topic provides an overview on how to enter placement requests or activities from non-HSPnet Users for purposes of statistical tracking and reports.
- **Welcome to eOPE Course Authoring** – this e-Topic is a prerequisite for all HSPnet users in the role of Content Author in the area of eOrientation for Practice Education (eOPE).

The HSPnet National Alliance Steering Committee and/or local HSPnet Data Stewardship Committees may recommend additional training or remedial action upon review of quarterly monitoring reports as required by HSPnet Policies.

#	Question	yes	*Yes and No* *(partial, incomplete, in preparation*	no	n/a	*Enc. Ref.*
B16	Are personal identifiers used to link or cross-reference multiple databases? *If so, please enclose.*	☒	☐	☐	☐	**See Appendix B9**

HSPnet assigns a unique ID # to the student as soon as the PSI enters their information into the system for the first time e.g. HSP1234. That unique identifier is associated with the student's enrollment in that specific program of study and does not change. HSPnet has added an additional unique student identifier for Alberta – the student's DD/MM of birth (not the YY of birth). This additional unique identifier assists with the prevention of duplicating student accounts

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to patient electronic health records (EHR's). These unique IDs are used in Alberta by AHS Information Access Management (IAM) when multiple students with the same name need access to EHR's. For example, if there are 3 Jane Doe's with confirmed placements in HSPnet and the wrong Jane Doe is issued with access to an EHR then we create a serious patient privacy breach. Unlike a SIN number the HSPnet unique ID is not so reliable. If the student was enrolled in a previous program, they would have been issued with a unique HSPnet ID for that program also. Therefore, AHS IAM requires more than one unique identifier for practicum students at its sites. That information is shared across a small number of AHS secure databases to eliminate risk to patient privacy. AHS is currently the only Alberta agency using the described unique identifiers in this manner.

Appendix B9: Web Service API-001: Security/Access Listing

***Note/Elaboration*:** Authorized users can use this Web Service to retrieve updated data about students who require computer/network access during an upcoming placement to their sites. In addition to student names and placement location/dates, the Listing will include student email addresses if the school-issued email address has been released to Receiving Agencies.

PRIVACY CONTROLS AND SECURITY						
#	*Question*	*yes*	***Yes and No*** *(partial, incomplete, in preparation)*	*no*	*n/a*	*Enc. Ref.*
B17	Have security procedures for the collection, transmission, storage, and disposal of personal information, and access to it, been documented? *If so, please enclose.*	☒	☐	☐	☐	**See Appendix B2 & B6**

Appendix B2: National HSPnet Policies
Appendix B6: Privacy & Security in HSPnet

***Note/Elaboration*:** Data management and security procedures are documented in Appendix B 2 HSPnet Policy 3.4 (see Appendix B6 for details).

Transmission

Defined within a service level agreement with PHSA, data security is protected through application design in the form of user authentication processes, system timeouts, data encryption, and policies and procedures in HSPnet. The host server provider is the British Columbia Institute of Technology (BCIT).

Consent Forms

The signed consent forms will be retained by the educational program of the Participating Agency that enters the student's information into HSPnet for a minimum of seven years or longer, if required by the PSI's record retention policies.

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Storage/Disposal of Personal Information

In 2013, an annual archival process was introduced to transfer older placement records from the live database to an archive for permanent storage. The live database contains editable placement records for the last 3-4 fiscal years, and older placement records will be stored in the archive database. The online placement history for students, instructors, and supervisors/preceptors will access both databases, and will therefore display a complete longitudinal record of all assigned placements.

#	Question	yes	**Yes and No** *(partial, incomplete, in preparation)*	no	n/a	**Enc. Ref.**
B18	Are privacy controls in place for the project?	☒	☐	☐	☐	
	• Need-to-know policies and procedures for personal information access	☒	☐	☐	☐	**B2**
	• Physical security and access controls	☒	☐	☐	☐	**B2 3.4**
	• IT security and access controls	☒	☐	☐	☐	**B2 3.4**
	• Others	☒	☐	☐	☐	
	Please enclose related documentation.					

Notes/Elaboration:

Access to HSPnet is based on an individual's role within their organization and is limited to data that is needed for their performance in that role consistent with the 'Identified Purposes and Handling of Personal Information in HSPnet' document. The user's organizational role is used to determine which of four access levels may be granted, with each level providing different rights for viewing and editing records and for changing agency setup tables. For example, a PSI's Placing Coordinator may view and edit data on placements involving their educational program(s) only, while an instructor in the same program may only view records of students in their specific course(s). A Receiving Agency unit manager may view or edit all incoming placements to unit(s) under his/her supervision, whereas a senior site manager may view only non- identifiable information for sites within his/her jurisdiction.

User access is controlled through complex password rules and frequent password expiry (every 90 days), with quarterly monitoring by the HSPnet Director to identify and follow up on inactive users and automatic de- activation after six months of inactivity.

All users are required, upon first login and then, every 90 days upon password expiry, to agree to 'User Responsibilities for HSPnet' that are specific to their access level. User Responsibilities are excerpted from the HSPnet Policies and customized to the individual's role and level of access rights.

The example below is for the user role of 'Placing Coordinator':

User Responsibilities for HSPnet:
Appendix B2 Policy No. 3.2: Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure

HSPnet users will ensure that an up-to-date Consent Form is on file before entering a student's identifiable information into HSPnet.

HSPnet users will enter identifiable student information only into the fields specified for this purpose (i.e. student last name, student first name) and will not enter names or other information that may identify a student into fields designated for other purposes such as Comments, Alerts, etc.

If a student's identifiable information contained in HSPnet is to be used for any new or previously unidentified purpose, including, but not limited to research or quality assurance activities, the student(s) affected will be contacted for the purpose of updating their informed consent to include the new or previously unidentified purposes.

Appendix B2 Policy No. 3.4: Safeguards for HSPnet Data

(Local Administrators only) – Local Administrators will grant or modify access rights for a user as appropriate for that individual's organizational responsibility for placing students as defined by the Identified Purposes. Local Administrators will grant access on a need-to-know basis only, and will limit each user's access to placement information that is within their organizational responsibility. (Local Administrators only) – Local Administrators will assign a unique User ID to each individual user; there will be no shared User ID's among HSPnet users.

HSPnet users will notify their Local Administrator of any changes to their organizational role that may impact their need for access to identifiable student information in general or for a specific educational program, discipline, or receiving destination. For example, if a user is no longer responsible for a unit or program area, the Local Administrator will be notified to remove that unit or program area from the user's access.

Once a user is authenticated, their access to data is controlled by complex business rules within the application that determine, throughout the placement cycle, what access is appropriate, given the user's organizational role. For example – a PSI can view student name and contact information at any time, whereas the Receiving Agency cannot view student identifiers until the placement is confirmed. The Receiving Agency gains access to student contact information such as e-mail address only for the purpose of provisioning IT access.

User access is monitored through audit fields that track activities such as user login and edits to certain data, and screen-based forms and associated rules provide controls as to the type and accuracy of data entered and accessed.

Physical Security and Access Controls:
Physical Access to HSPnet equipment and storage media is limited to authorized staff and contractors of PHSA as host provider. Physical and logical security for PHSA-managed equipment and network services is guided by the Service Level Agreement between these parties and is evaluated annually through a physical inspection.

Administrator access to the servers is limited to authorized members of the PHSA who are required to sign an 'Agreement on Confidentiality and Rules of Conduct for HSPnet Service Providers'.

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#	Question	yes	**Yes and No** *(partial, incomplete, in preparation)*	no	n/a	**Enc. Ref.**
B19	If personal information will be used in the electronic delivery of services, have technological tools and system design techniques been considered which may enhance both privacy and security (e.g. encryption, technologies of anonymity or pseudo-anonymity, or digital signatures)?	☒	☐	☐	☐	**See Appendix B2 3.2b**

Appendix B2: National HSPnet Policies
- Privacy, Security & Data Access
  - 3.4 Safeguards for HSPnet Data

*Note/Elaboration***:** HSPnet employs use of anonymity in transactions until the placement is confirmed by the PSI, or at the PSI's discretion, during the consideration process if the receiving agency has a need to know. In addition, complex screen rules determine what data is released at various points in the placement cycle, as appropriate for the user's organizational role and associated need to know.

All HSPnet data transmissions are secured via industry-standard tools that provide 128-bit encryption. System requirements for user access to HSPnet include a minimum specified version of Internet Explorer, capable of accommodating 128-bit encryption.

AUDIT AND ENFORCEMENT						
#	Question	yes	**Yes and No** *(partial, incomplete, in preparation)*	no	n/a	**Enc. Ref.**
B20	Have arrangements been made for audit, compliance and enforcement mechanisms for the proposed project, including fulfillment of the commitments made in the PIA?	☒	☐	☐	☐	**See Appendix B2b 3.4b**

Appendix B2, Policy 3.4: National HSPnet Policies
- Privacy, Security & Data Access
  - 3.4 Safeguards for HSPnet Data

*Note/Elaboration***: Auditing –** Key changes to HSPnet placement records are recorded in History tables for each placement for the purposes of (1) providing an online transaction history and (2) to support periodic audits to identify potential problems with the user interface or training, to investigate reported or suspected security problems or to detect unreported security problems.

All data creation/revision is also tracked in a History Table specific to each student. The History Table identifies the field(s) affected, pre and post-change data values, creation/revision date, and user ID that made the change.

All disclosures of identifiable student information are tracked within the History Table of each placement request, including data on disclosure, status change, or manual release process that resulted in the disclosure and the authorizing user.

Processes for monitoring policy compliance and sanctions for policy breaches are also defined, in the form of an escalation procedure [Policy 3.4 (n)], leading to disabling of the user ID for the offending user(s) and/or all users within the user's agency.

Audit reports are run on a quarterly basis, as required by HSPnet Policy 3.4. The HSPnet National Alliance Steering Committee reviews the audit schedule on an annual basis.

The HSPnet Director is responsible for ensuring that monitoring is carried out on a quarterly basis or more frequently, as required by HSPnet Policies on Privacy, Security and Data Access. The National and local Data Stewardship Committees review the results of quarterly monitoring activities at each meeting, along with recommendations of the HSPnet Director and/or results of any interim remedial actions taken in advance of their meeting.

The National and local committees can also recommend additional actions and/or changes to Policy, including monitoring processes and/or frequency at any time, and an annual review of the monitoring and escalation processes, and monitoring schedules, is a mandatory requirements of the Policy, regardless of any breaches or other problems.

Compliance and Enforcement Mechanisms – as indicated above, the HSPnet National Alliance is accountable to each partner jurisdiction and conducts an annual review of HSPnet Policies on Privacy, Security and Data Access and recommends minimum requirements for periodic monitoring and/or audit as required by the Policies.

Each province's local Data Stewardship Committee will be responsible for application and monitoring of the Policies and local processes, as needed, to ensure the integrity of user data, protection of privacy and security of personal information, and appropriate use of data in support of business objectives. The Data Stewardship Committee for HSPnet-AB will report on local monitoring activities and the results of compliance and enforcement activities to Alberta Health and HSPnet-AB user agencies.

Each province must identify a local HSPnet Privacy Officer. This person will work closely with the province's Data Stewardship Committee. The local HSPnet Privacy Officer would respond to inquiries specific to HSPnet-AB and local use of the HSPnet application.

Local Data Stewardship Committees can direct agencies within their jurisdiction to address procedural, technical, privacy or data security issues that may arise. Issues that cannot be resolved by local Data Stewardship Committees will be escalated to the HSPnet National HSPnet Privacy Officer and/or the National Data Stewardship Committee. Provincial Data Stewardship Committees may also recommend Policy changes to the National Alliance for consideration.

Compliance with HSPnet Policies and satisfactory response to requests or recommendations from the local Data Stewardship Committee as a result of audit or monitoring activities are requirements of ongoing access by a jurisdiction's agencies to HSPnet.

Once this PIA has been accepted by your office, a copy will be posted on HSPnet website at www.hspcanada.net (Privacy & Security/Resources/PIAs) along with the PIAs from other participating provinces.

All new agencies that consider using HSPnet-AB will be directed to this document and will be specifically directed to the HSPnet Policies on Privacy, Security and Data Access.

Appendices:

Appendix A

A 1   Privacy Impact Assessment; May 14, 2008

Appendix B

B 1   HSPnet Overview & Benefits

B 2   National HSPnet Policies

B 2a   National HSPnet Policies
- Section 4 – HSPnet Governance & Management

B 2b   National HSPnet Policies
- Section 3.0 Privacy, Security & Data Access

B 3   Identified Purposes & Handling of Personal Information & Personal Health information in HSPnet

B 4   HSPnet Functions (Flow of Personal Information)

B 5a   Managing User Access

B 5b   Policy Application Guide:
- Policy 3.2 Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure

B 5c   Consent for Use and Discloser of Student Information

B 5d   Placement Request Application to Receiving Agencies using HSPnet

B 6   Privacy & Security in HSPnet

B 7   Guest Access for (non-user) Placing Agencies

B 8   HSPnet Training Course Outlines (List)

B 9   Web Service API-001: Security/Access Listing