



National HSP*net* Policies

Approved by the

National HSPnet Alliance Steering Committee

Reviewed/Updated: February 18, 2015

Preamble

HSPnet is an initiative of the Provincial Health Services Authority (PHSA), a not-for-profit organization that licenses HSPnet and manages the system on behalf of provinces in Canada that use HSPnet as members of the National HSPnet Alliance (“the Alliance”). A Lead Agency in each province or jurisdiction enters into an agreement with the PHSA to license HSPnet on behalf of Participating Agencies (sub-licensees) within that province or jurisdiction.

The shared infrastructure of the Alliance (encompassing system/network management, user training and support, documentation, enhancements, evaluation, and policy) is governed by the National HSPnet Alliance Steering Committee (NHASC). This Committee is responsible for ensuring the success of the shared infrastructure through financial sustainability and achievement of mutual goals.

This document represents the *National HSPnet Policies* that were developed to govern the use of HSPnet by licensee and sub-licensee organizations, to ensure:

- Compliance with provincial and federal legislation on privacy and security of personal information;
- Consistency of policy and procedures across user organizations and Lead Agencies; and
- Cost-effectiveness of infrastructure operations through standardized processes and economies of scale.

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Revision History

Date	Policy	Description of Change
Mar 30/09	2.1	Replaced reference to “Partnership” with “Alliance”
Mar 30/09	3.0	Replaced 2 references to “Partners” with “Alliance members” and “Alliance”
Mar 30/09	3.2	Policy 1.b – added policy to allow Destinations to request release of Student gender on a need-to-know basis. Procedures (e), (f) and (g) – added procedures to support release of Student gender
Mar 30/09	3.4	Procedure (h) – added requirement for Local Administrators to ensure that a dedicated, and not shared, email address is entered for each user account,
Sep 30/09	3.2	Procedure (f) – added requirement for organizational policy to support request for student gender; added limitation for only Receiving Coordinators to modify this field.
Mar 31/10	3.4	Procedure (o) – added a clause to permit immediate disabling of user ID(s), at the HSPnet’ Director’s discretion, in a serious situation.
Jul 27/11		Approved by the NHASC as distributed
	2.1	Changed from HSPnet-XX Coordinator to HSPnet-XX Lead Agency or HSPnet-XX Provincial Coordinator. Intent: to clarify roles because many provinces do not have HSPnet Coordinators.
	3.0	Changed CEO to Executive Director
	3.1	Changed CEO to Executive Director / Change from Privacy Officer to National Privacy Officer
	3.3, 3.4, 3.5	Minor changes in roles and titles
	3.6	Removed Item #2 re: Data Sharing Agreement. This policy item is embedded in the new Collaborative Agreement between Lead Agencies and the PHSA. A separate document will not be developed.
Aug 1/11		(n) Changed the auditing period from six month to three months after a breach of policy
Aug 1/11		Approved by the NHASC as distributed
May/12	5.0	Added a section on the User Reference Group
Dec 4/12	3.0	(2.) Only completed PIAs will be posted on the public website
	3.4	(i) Updated policy to allow users to use shared/generic emails addresses as long as they enter a secure email.
	3.6	(3.) New policy whereby Lead Agency representatives will be granted access to specific provincial data in support of their mandate for HSPnet in their province. (d) Added a procedure for cross-agency access
Jan 4/13	3.0.2	Changed the requirement for each Alliance jurisdiction to submit a PIA from a mandatory requirement (“will”) to a best practice (“should”)
	3.1.a	Amended “...establishes an ongoing HSPnet-XX Data Stewardship Committee” to “...establishes an ongoing national HSPnet Data Stewardship Committee”
	3.4	Changed procedures (j), (k) and (o) – transfer responsibility for annual review to the national Data Stewardship Committee Procedures (l) and (m) – merged as a single reference to “data quality, privacy and security”
Feb 5/13	3.4	Clarified the requirement for secure email to be a requirement for direct communication from other users, and delivery of passwords Procedure (p) – updated the reference to automatic inactivation of idle user accounts, now done on a quarterly basis
	3.6	Additional Documents: added a reference to the procedure for Lead Agency access to provincial data
Nov 15/13	1.0	Clarification of definitions to specify Placing and Receiving agencies; added a new policy 1.3 to permit termination of sub-licensee access by Lead Agencies.
Jan 9/14	3.4	Procedure (l) – corrected the term “private information” to “personal information”
Jan 30/14		Approved by NHASC as distributed
Mar 13/14	1.0	Clarification of definition for a Receiving Agency, added “... that primarily delivers health services”; clarification of an eligible placement
Sep 15/14	Various	Reference to BCAHC and BCAHC roles replaced by PHSA.

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Date	Policy	Description of Change
Oct 1/14		Approved by NHASC as distributed
Nov 15/14	3.2.1	New clause to permit use of student gender within an educational program, plus addition of new disclosures of student gender to receiving sites for (1) locker assignment and (2) other purposes covered under a province-specific consent form.
Jan 31/15	3.4	Procedure (p) – updated the reference to automatic inactivation of idle user accounts, now done on a weekly basis
	3.1	Added a definition for “Data Steward” and clarified the role of “Data Custodian”
	3.1	Changed the role of PHSA from “Data steward” to “Custodian”
	3.1	Clarified the role of the National Privacy Officer to “support the interpretation, application, and enforcement of the National HSPnet Policies”
	3.4	Procedure (m) - Changed the escalation procedure to involve the local Privacy Officer during the 2 nd offense, and to add the local Privacy Officer and Lead Agency in the event of a 3 rd offense.
	3.6	Data Access Approval Guidelines – changed the body that is responsible to approve PAL accounts from the local DSC to the Lead Agency.
Feb 6/15	3.6	Added a requirement for Lead Agencies to comply with Data Access Approval Guidelines when distributing data received under policy 3.6.3.
Feb 18/15		Approved by the NHASC as distributed
Jul 30/15	3.2	Background, Policy 1 – Changed the “identified purposes” of HSPnet to include “... and evaluating”.

Section 1: Eligibility for HSP_{net} Access

Policy No. 1.0: HSP_{net} Access - General

Purpose

To propose standard criteria for Lead Agencies to issue a sub-license in Canada, and to provide Lead Agencies with a mechanism to terminate sub-licensee access on reasonable grounds.

Principle

Once admitted to a health professional education program, students deserve a quality learning experience (excerpted from “*BCAHC Post-Summit Action for Student Placements – January 14, 2005*”)

Policy

1. PHSA will maintain a definition of eligibility for HSPnet access that will maximize the system-wide benefits for all Participating Agencies.
2. All agencies that use HSPnet will agree to comply with the *National HSPnet Policies*.
3. A Lead Agency may authorize the PHSA to terminate sub-licensee access on reasonable grounds.

Definitions

Eligible Agency – An Agency is eligible for access, via an authorized User ID, to a provincial instance of HSPnet (HSPnet-XX) if it is:

- An educational institution (“Placing Agency”) that registers students in a health sciences educational program, and places those students in clinical practica or fieldwork opportunities within that province; OR
- An organization that primarily delivers health services (“Receiving Agency”) and accepts students from health sciences educational programs in clinical practica or fieldwork opportunities.

Eligible Placement - A practicum experience that involves a student from a Placing Agency who is placed in a Receiving Agency. This may include:

- A practicum experience that is tracked by an Eligible Placing Agency, in any type of Receiving Agency
- A practicum experience that is tracked by an Eligible Receiving Agency, from any type of Placing Agency

Procedures

- a. The NHASC will review the above definition of an Eligible Agency on an annual basis.
- b. PHSA will ensure that all Lead Agencies joining the national HSPnet Alliance include a requirement for sub-licensees to comply with the *National HSPnet Policies*.
- c. PHSA will provide a mechanism for sub-licensees to terminate their own access after they address active data in HSPnet that affects other agencies (e.g. upcoming placement requests) and expire student consent so that their personal information will be hidden according to Policy 3.2.

- d. If a sub-licensee is not able to address their active data as required to terminate access, the Lead Agency may authorize PHSA to address the active data on their behalf – i.e. to cancel upcoming placement requests and to expire consent for all students. The Lead Agency may elect to provide this authorization if the sub-licensee:
- Is non-compliant with the *National HSPnet Policies*;
 - Volunteers to terminate their access; or
 - Fails to remit the required fees for their jurisdiction (e.g. annual subscription fee).

Section 2: HSPnet Funding & Sustainability

Policy No. 2.1: Cost Recoveries and Subscription Fees

Purpose

To facilitate (optional) processes in each province that enable user agencies to contribute to the ongoing costs of HSPnet implementation, operations and enhancement.

Principle

Agencies that use HSPnet may contribute towards the costs of operating and enhancing the system.

Policy

1. Each Lead Agency may choose to develop one or more mechanisms to recover ongoing costs of HSPnet operation and enhancement from Participating Agencies in that province.
2. If a Lead Agency's cost recovery mechanisms include a subscription fee for some or all members, the Lead Agency may adopt the following Procedures to manage the subscription process.

Definitions

Subscriber Agency – A Participating Agency that holds a subscription under this Policy.

Procedures

- a. An Eligible Agency (as defined in Policy 1.0) that wishes to access HSPnet on a subscription basis will contribute to their jurisdiction's one-time implementation costs and ongoing support through payment of an annual subscription fee, to be payable in each fiscal year (April 1 to March 31).
- b. A Lead Agency that wishes to collect subscription fees will develop and maintain a process and fee schedule for Subscription applications and renewals, and will review the subscription process and fee schedule on an annual basis.
- c. The Lead Agency or Provincial Coordinator will provide new Subscriber Agencies in their jurisdiction with an *HSPnet Subscription Application/Renewal Form*, based on information about the Subscriber Agency's programs/sites and activities.
- d. A new Subscriber Agency will return their signed *HSPnet Subscription Application/Renewal Form* to the Lead Agency or Provincial Coordinator, who will then invoice the Subscriber Agency for the appropriate time period; the invoice amount may be pro-rated for partial year access.
- e. The Lead Agency or Provincial Coordinator will forward a copy of the signed *HSPnet Subscription Application/Renewal Form* to the HSPnet Team Leader, who will then schedule implementation training for the new Subscriber Agency. The HSPnet Team Leader, Subscriber Agency, and Provincial Coordinator may agree to schedule implementation training prior to receipt of the subscription payment so long as the form has been signed and returned.
- f. The Provincial Coordinator will establish an escalation procedure for following up on delinquent payments from Subscriber Agencies (new applicants or renewals), and may instruct PHSA to disable all user ID's in a Subscriber Agency that has not paid the current year's subscription fees.

Resources

- *HSPnet-XX Subscription Application / Renewal form*

Section 3: Privacy, Security and Data Access

Policy No. 3.0: Privacy and Security - General

Purpose

To ensure the protection of personal information (PI) in HSPnet under the management of PHSA.

Principles

PHSA and the Alliance members endorse the 10 Principles of the Canadian Standards Association (CSA) Model Code, now included in the federal *Personal Information Protection and Electronic Documents Act*. These principles are recognized as the foundation for privacy protection legislation and are reflected in *BC's Freedom of Information and Protection of Privacy Act* and in other provincial legislation. The 10 principles that underlie the HSPnet privacy and security program are:

- **Accountability** - An organization is responsible for PI under its control and shall designate an individual(s) who are accountable for the organization's compliance with the principles.
- **Identifying purposes** - The purposes for which PI is collected shall be identified by the organization at or before the time the information is collected.
- **Consent** - The knowledge and consent of the individual are required for the collection, use, or disclosure of PI, except where inappropriate.
- **Limiting Collection** - The collection of PI shall be limited to that necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.
- **Limiting Use Disclosure and Retention** - PI shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. PI shall be retained only as long as necessary for the fulfillment of those purposes.
- **Accuracy** - PI shall be as accurate, complete and up-to-date as needed for the identified purposes.
- **Safeguards** - PI shall be protected by security safeguards appropriate to its level of sensitivity.
- **Openness** - An organization shall make readily available to individuals specific information about its policies and practices relating to the management of PI.
- **Individual Access** - Upon request, an individual shall be informed of the existence, use, and disclosure of his or her PI, and shall be given access to that information.
- **Challenging Compliance** - An individual shall be able to address a challenge regarding the above principles to the designate individual or individuals accountable for the organization's compliance.

Policy

1. PHSA will ensure that a comprehensive privacy and security program is maintained for HSPnet, in order to meet the requirements of provincial and federal legislation in each province where HSPnet is used.
2. As a best practice, each Alliance member should conduct a Privacy Impact Assessment (PIA) to ensure that HSPnet meets or exceeds the legislated privacy requirements of their jurisdiction. The completed PIA will be submitted by the Lead Agency on behalf of Participating Agencies, in the format required for the jurisdiction's province(s) if specified, to the required privacy office(s) if specified or on a voluntary basis to one or more privacy offices as recommended by the Lead Agency. Completed PIAs will be posted on the HSPnet website for each jurisdiction.

Section 3: Privacy, Security and Data Access

Policy No. 3.1: Accountability

Purpose

To establish accountability for personal information in HSPnet under the management of the PHSA.

Principles (based on the 10 Principles of the CSA Model Code)

- Accountability is organizational in focus and will apply to all systems and programs and all data for which PHSA acts as the Custodian.
- PHSA is responsible for PI under its control and shall designate an individual or individuals who are accountable for compliance with legislation and professional standards governing the protection of personal information.

Policy

1. The NHASC will be responsible to the organizations represented by its members for the development and effectiveness of *National HSPnet Policies*, including policies to support the privacy and security of personal information in HSPnet.
2. PHSA is accountable to the NHASC and provincial Lead Agencies for the conduct of HSPnet Vendors, including compliance with the *National HSPnet Policies*.
3. PHSA will ensure that all of its staff and contractors who have access to HSPnet data are guided by clear rules of conduct and confidentiality.
4. Lead Agencies are responsible for compliance with the *National HSPnet Policies* by user agencies within their jurisdiction.
5. PHSA will ensure that policies relating to privacy and security of PI in HSPnet are maintained in the event that the PHSA transfers the management of HSPnet to an external organization on either a temporary basis (e.g. outsourcing contract) or permanent basis (legal transfer).

Definitions

Data Steward – an individual or body that is responsible for oversight of data assets to provide business users with high quality data that is accessible in a consistent and appropriate manner.

Custodian – an individual or body that is responsible for maintaining and protecting data on behalf of others. Custodians are responsible for developing and applying processes for data creation or acquisition, sharing and access, reliability, security, and disposition.

Vendor – a contractor in physical or logical possession of information that is protected by the Custodian. Typically, a Vendor provides day-to-day management of the databases, applications, and/or hardware that support the collection, use and disclosure of information. Given their potential access to personal information, Vendors should operate under clear rules of conduct and confidentiality.

Procedures

- a. Lead Agencies may act as Data Steward or may establish a local Data Stewardship Committee to advise the Lead Agency and to Participating Agencies in that jurisdiction. The NHASC will ensure that each province using HSPnet establishes a local Data Stewardship Committee or participates in the National Data Stewardship Committee (NDSC).

- b. The NDSC will conduct an annual self-assessment of its effectiveness in the role of national data steward, and will report the results to the NHASC.
- c. The NHASC will maintain a process to encourage input from HSPnet-XX users into the development, application, and ongoing review of the *National HSPnet Policies*.
- d. PHSA will ensure that all new PHSA staff and contractors with access to personal information in HSPnet receive appropriate training and sign a document entitled *Agreement on Confidentiality and Rules of Conduct for HSPnet Service Providers* prior to gaining access to HSPnet. The signed document will be maintained on file at the PHSA offices.
- e. PHSA will appoint a National HSPnet Privacy Officer (NPO) to be responsible for overseeing processes to protect personal information in HSPnet, and to act as a resource to the local Privacy Officer in each jurisdiction.
 - The NPO will support the interpretation, application, and enforcement of the *National HSPnet Policies* in each jurisdiction.
 - The NPO will ensure that each province using HSPnet publishes the contact information of the NPO and local Privacy Officers (including title and office phone, email and mailing addresses) on the HSPnet public website and in publications relating to the collection, use or disclosure of PI in HSPnet.
 - The NPO will train PHSA staff and contractors involved with HSPnet on the *National HSPnet Policies*.
- f. The Lead Agency in each jurisdiction will appoint a local Privacy Officer to be responsible for overseeing processes to protect PI in their jurisdiction.

Resources

- *Role Description – HSPnet-XX Privacy Officer*
- *Terms of Reference – National Data Stewardship Committee*
- *Agreement on Confidentiality and Rules of Conduct for HSPnet Service Providers*

Section 3: Privacy, Security and Data Access

Policy No. 3.2: Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure of Personal Information

Background

Students may choose to authorize their educational institution to use and/or disclose their PI via HSPnet for the purpose of finding, coordinating and evaluating student placements as required for their educational program.

Purpose

To identify the purposes of PI in HSPnet and to ensure that informed consent is obtained prior to collecting PI for the identified purposes.

Principles (based on the 10 Principles of the CSA Model Code)

- The purposes for which PI is collected shall be identified by an organization at or before the time the information is collected.
- The knowledge and consent of the individual are required for the collection, use, or disclosure of PI.
- The collection of PI shall be limited to that which is necessary for the purposes identified by an organization. Information shall be collected by fair and lawful means.
- PI shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. PI shall be retained only as long as necessary for the fulfillment of those purposes.

Definitions

Students – An individual registered in an educational program. A student's name, contact information and practice education profile are considered to be **Personal Information (PI)**.

Staff – An individual employed or contracted by an educational institution or receiving site that is involved in practice education activities. Staff name, business contact information, and practice education profile are considered to be the **Business Information** of the employing/contracting organization and are not considered to be PI.

Policies

1. PI will be collected, used and disclosed via HSPnet on a need-to-know basis only and for purposes consistent with finding, coordinating and evaluating appropriate placements for students (the identified purposes for collecting data via HSPnet, or "Identified Purposes"). In general, "need-to-know" will commence after the placement is confirmed, in order to initiate communications with the student and to coordinate their placement.
 - a. Student identity (name only) may be released prior to confirming a placement in situations where communications must start before the placement can be accepted (i.e. to arrange an interview before accepting a placement) or when considering where a student should be placed (i.e. if the student is employed by the receiving site).
 - b. Student gender may be entered into HSPnet by an educational program for internal use according to the educational institution's policies, and for release to Destinations that have a justifiable need-to-know a student's gender for the following limited uses:

- To support assignment of supervisors in service areas that respect patient/client preferences for the gender of their provider (e.g. homecare services). Student gender would be disclosed only to Destinations that specify this requirement in their online Destination Profile;
 - To support allocation of lockers, change rooms, or other facilities that are segregated by gender;
 - To support other disclosures of gender for purposes that are specified in a province-specific consent form that has been adopted by all educational programs in that province.
2. The Identified Purposes will be explained to students at the time of entering their PI into HSPnet, or within a reasonable period of time after entry into HSPnet if the entering agency is relying on a previous consent or notification process relating to use/disclosure of their PI for the purpose of coordinating a placement experience.
 3. All PI to be used or disclosed via HSPnet will be described clearly by the Identified Purposes and the amount and type of information, and length of time that the personal information is retained, will be limited to that required to meet the Identified Purposes.
 4. PI will be obtained directly from the student or from information provided with the student's consent and for the Identified Purposes, and will not be used or disclosed after fulfillment of the Identified Purposes.
 5. Informed consent, based on receipt and acknowledgement of the Identified Purposes, will be obtained from a student before entering their PI into HSPnet.
 - a. During initial implementation of HSPnet, the agency entering the student information may elect to rely on a previous process whereby students have been notified and/or given consent to use/disclose their PI for the purpose of coordinating a placement experience.
 - b. Any agency relying on a previous process for notification and/or consent will make reasonable efforts, during the months following HSPnet implementation, to obtain formal consent based on the Identified Purposes and handling of their PI via HSPnet.
 6. A student may withhold consent to collect, use or disclose their PI via HSPnet, and will be advised of the potential delays or other impacts of withholding that consent.
 7. 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 the prior consent.
 8. A student has the right to request that the use and/or disclosure of their PI in HSPnet be restricted. Such requests must be made in writing to their educational program coordinator. If restriction of use of their PI as requested precludes the use of HSPnet, they will be informed of the potential delays or other impacts of requesting that restriction.
 9. Informed consent for any new purposes beyond the Identified Purposes will be obtained from a student before collecting their PI or prior to using their personal information if the new purpose applies to data already stored within HSPnet.
 10. PI will be used or disclosed via HSPnet only during the period covered by the student's consent, which will expire automatically upon graduation or after six years (whichever is less), plus 180 days to provide a "housekeeping period" for updates and corrections. After the housekeeping period, PI will no longer be used or disclosed via HSPnet except with student consent via letter or email.
 11. PI may be stored in HSPnet archives beyond the consent period, in accordance with Data Retention and Archival schedule approved by the NHASC, for the following specific and limited purposes:

- Release to a student of a copy of their own placement history, upon written request accompanied by proof of identification;
- Compliance with a subpoena or other legally binding access to the information;
- Quality assurance or research purposes that involve use of de-identifiable data only.

Procedures

- a. The PHSA will develop and maintain a document entitled *Identified Purposes and Handling of Personal Information in HSPnet*. The document will summarize the amount, type and purposes of PI to be used or disclosed via HSPnet, and will be provided to all students at the time of obtaining their informed consent and prior to entry of their PI into HSPnet.
- b. Students providing PI for use in HSPnet will indicate their informed consent by signing a *Consent Form for Use and Disclosure of Personal Information* ("Consent Form") for each educational program that uses HSPnet, prior to their PI being entered into HSPnet.
- c. Signed Consent Forms will be maintained on file by the educational program of the Participating Agency that enters the student information into HSPnet for a minimum of seven years or longer if required by the Participating Agency's record retention policies.
- d. HSPnet users will ensure that an up-to-date Consent Form is on file before entering a student's identifiable information into HSPnet. If student information is entered into HSPnet during the implementation period based on a previous consent or notification process, HSPnet users will make reasonable efforts to obtain a signed Consent Form for all students whose personal information is being entered into HSPnet.
- e. Educational Programs will be permitted to enter Student gender in HSPnet only if they setup their Program to use this data field. If gender is entered, it will be disclosed via HSPnet only to Destinations that specify this requirement.
- f. Receiving Destinations that require Student gender as per this Policy must specify this requirement in their online Destination Profile. This requirement should be based in organizational policy as appropriate, and can be entered into HSPnet only by a user with the role of Receiving Coordinator (Local Administrator access level) on behalf of the Destination Coordinator.
- g. On an annual basis, PHSA will report to the NDSC on the name and discipline of all educational Programs setup to use/disclose Student gender, and the Agency/Site/Service of all Destinations specifying a requirement for disclosure of Student gender.
- h. HSPnet users will only enter identifiable student information into the fields specified for this purpose (student last name, student first name) and will not enter names or other information that may identify a student into fields designated for Comments, Alerts, or other purposes.
- i. 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 by a representative of their educational program for the purpose of updating their informed consent to include the new or previously unidentified purposes.

Resources

- *Consent Form for Use and Disclosure of Personal Information*
- *Identified Purposes and Handling of Personal Information in HSPnet*
- *PHSA Policy 3.4: Safeguards*

Section 3: Privacy, Security and Data Access

Policy No. 3.3: Accuracy of HSPnet Data

Purpose

To ensure that all reasonable efforts are made to guarantee the accuracy and completion of PI in HSPnet.

Principle (based on the 10 Principles of the CSA Model Code)

PI shall be as accurate, complete and up-to-date as needed for the identified purposes.

Policies

1. Participating Agencies will ensure that students have mechanisms to notify their educational institution of changes to their PI.
2. The PHSA and Participating Agencies will make reasonable efforts to ensure that PI provided by a student is entered into HSPnet without errors or omissions.

Procedures

- a. PHSA will build, test and implement mechanisms in HSPnet that facilitate the accurate entry of information by including tools such as:
 - Mandatory fields
 - Data entry confirmation prompts
 - Duplicate entry
 - Formatting rules
- b. PHSA will respond to reported problems with data accuracy or completeness and will alert the NDSC and/or NHASC as to the nature and cause of the data quality issue plus recommendations or actions taken. Such actions may include training, user communications, and improvement of HSPnet functionality.
- c. User Agencies may contact the HSPnet Help Desk to arrange for a direct upload of student or staff data from their school information system or other databases, into the HSPnet database. PHSA will maintain detailed instructions and data specifications to guide uploads from external data sources, and will ensure that the data to be uploaded is consistent with the purposes for collecting student information as defined by the Identified Purposes.
- d. Participating Agencies will be responsible for ensuring the accuracy of information uploaded to HSPnet.
- e. The HSPnet Team Leader will ensure that data uploads to HSPnet are checked for generic data errors, such as extra spaces or punctuation, that would impact data quality in HSPnet.

Section 3: Privacy, Security and Data Access

Policy No. 3.4: Safeguards for HSPnet Data

Purpose

To ensure that PI is protected by appropriate security safeguards.

Principles (based on the 10 Principles of the CSA Model Code)

- Safeguards are necessary to protect the data's confidentiality, integrity and availability.
- Safeguards must include: 1) preventive, 2) detective, and 3) corrective controls.
- Effective controls consist of four elements: 1) the control itself, 2) an agreement to employ the control, 3) a compliance mechanism to ensure that the agreement is being upheld, i.e., that the control is being used effectively and 4) consequences for breach of the agreement.
- Security controls apply to all individuals - staff, students, contractors, affiliates and partners. Security controls must be applied to all elements of information management: information, infrastructure, applications, and business process and should include physical measures, organizational measures and technological measures.
- Access control is required to prevent unauthorized persons from accessing data and to prevent authorized persons from accessing data for unauthorized purposes. Data accessed for an authorized purpose must not be used for an additional purpose.

Policies

1. PHSA will follow industry standards and/or best practices on safeguards to protect the confidentiality, integrity and availability of data in HSPnet.
2. PHSA will enforce compliance with standards wherever possible through automated tools and scheduled activities that detect possible problems with safeguards and facilitate development and introduction of remedies.
3. PHSA will incorporate initial and ongoing education about *National HSPnet Policies* into all training materials and processes, and into regular user communications.

Procedures

- a. PHSA will maintain a comprehensive Service Level Agreement to ensure its hardware/network provider follows industry standards and/or best practices to safeguard the physical security of the server and network. These standards will include provisions for protection from viruses and other threats, firewall management, data encryption, and reporting of security breaches or data loss to the PHSA by the end of the work day during which the breach or loss occurred.
- b. PHSA will monitor the activities of the Hardware/network provider and take immediate corrective actions if the minimum standards of the Service Level Agreement are not met.
- c. PHSA will report any user access infractions or data loss by the end of the work day during which the infraction or loss occurred, to the Provincial Coordinator and/or Lead Agency representative of the affected jurisdiction, and to NHASC members as appropriate.

- d. The PHSA will issue a User ID with Local Administrator rights to one or more authorized individuals within each Participating Agency, and will provide Local Administrators with comprehensive training and documented instructions on their responsibilities as Local Administrator.
- e. Local Administrators will be responsible for creating, managing, and deleting User ID's for other authorized individuals within their organization. They will not be permitted to create additional User ID's with Local Administrator rights.
- f. 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.
- g. PHSA will ensure that HSPnet tools for managing user access provide adequate granularity and specificity to allow users to perform their work while protecting PI and other data from intended or inadvertent browsing or tampering.
- h. Local Administrators will assign a unique User ID to each individual user; there will be no shared User ID's among HSPnet users. Local Administrators will ensure that each user has a secure email address entered into HSPnet for the purpose of direct communication from other HSPnet users and for receipt of system messages from HSPnet, including delivery of passwords.
- i. 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.
- j. The HSPnet application will automatically forward a random, confidential, complex password to the user's email account upon creation of a new User ID. New users will be required to select a new password upon login for the first time. Passwords will be of a format complex enough to prevent guessing or other routine efforts to use another individual's User ID. The password format and rules will be reviewed annually against industry standards by PHSA.
- k. The HSPnet application will automatically require users to change their password according to a set schedule to be determined and reviewed annually by PHSA.
- l. The NDSC will review the results of semi-annual data audits related to data quality, privacy and security in order to detect intentional or unintentional release of PI and inappropriate access to data.
- m. The NPO will address any incidents or breaches of Policy by:
 - On a first offence, alert the offending user as to their Policy breach, direct them to the Policy regarding next steps upon escalation, and audit 100% of transactions for that user for three months;
 - On a second offence of one or any users in a single agency, alert the local Privacy Officer and the Dean/Director or Department Head for the offending user(s), direct them to the Policy regarding next steps upon further escalation, and audit 100% of transactions for that agency for three months;
 - On a third offence of one or any users in a single agency, alert the PHSA, local Privacy Officer, and Lead Agency and recommend action up to and including disabling the access rights of the offending user(s)' and/or all users' access rights; if access is permitted to continue, audit 100% of transactions for that agency for three months.
- n. Notwithstanding the escalation process outlined in Procedure 3.4.m above, PHSA or the NPO may disable access rights for one or more offending user(s) immediately at their discretion, even for a user's first offence, in serious situations including but not limited to:

- An offence that represents an immediate and/or significant risk to student privacy;
 - An offence where the user's action appears to be intentional or malicious in nature;
 - An offence that significantly and negatively impacts data quality in HSPnet.
- o. The HSPnet application will automatically timeout if left inactive for a set period of time. The timeout period will be reviewed annually by PHSA.
- p. Unused User ID's, which have been inactive for a period of six months, will be inactivated automatically on a weekly basis via an HSPnet utility.
- q. The PHSA will ensure that a system for records retention, disposal and archival is maintained, with processes and timelines consistent with the *Identified Purposes* handout and consistent with the Student Consent form. The processes and timelines will be reviewed annually by the NDSC and recommendations sent to the NHASC.

Section 3: Privacy, Security and Data Access

Policy No. 3.5: Openness, Individual Access and Challenging Compliance of HSPnet Data

Purpose

To ensure openness and accessibility for students whose PI is contained in HSPnet.

Principles (based on the 10 Principles of the CSA Model Code)

- An organization shall make readily available to individuals specific information about its policies and practices relating to the management of PI.
- Upon request, an individual shall be informed of the existence, use, and disclosure of his or her PI, and shall be given access to that information.
- An individual shall be able to address a challenge concerning compliance with the above principles to the designate individual or individuals accountable for the organization's compliance. Safeguards must include: 1) preventive, 2) detective, and 3) corrective controls.

Policies

1. The *National HSPnet Policies* will be made available and open with respect to management of PI. These policies will describe the mechanism whereby a student can access their own information as well as a complete description of the type of PI collected and the Identified Purposes for the information.
2. The PHSA will provide the opportunity for students to access data collected in their name. Only the student or their designated representative has a right to access such personal information and no student will be entitled to PI on another individual.

Procedures

- a. The *National HSPnet Policies* will be made available on the HSPnet website at www.hspcanada.net, or upon request by a student to the NPO.
- b. A student can request a copy of their PI in HSPnet by presenting a written request to the placement coordinator of their educational program along with two pieces of identification, one of which must be their current student identification card with student number and photograph. The placement coordinator will provide the student, within two weeks of the request, a list of specific information contained in HSPnet and, if requested, a list of uses/disclosure of that information plus an explanation of the list provided. The placement coordinator will copy the local Privacy Officer and NPO on the response to the student.
- c. Any decision to refuse all or part of a student's request for access to information will be relayed in writing to the student/requestor and will include (1) the specific provision for refusal under the jurisdiction's legislation and (2) clear reasons for the refusal.
- d. A student may request changes to their PI contained in HSPnet by submitting a request in writing to the placement coordinator of their educational program. If the request cannot be accommodated, the educational program will provide a written explanation of the reasons that their request cannot be granted and a notation will be made on the student's record that their request for a change was declined.

- e. A student may register a complaint or challenge regarding the handling of PI in HSPnet in writing to their local Privacy Officer, who will investigate the complaint/challenge through the involved Participating Agencies. If the student is unsatisfied with the response from the provincial Privacy Officer, this student may register a complaint to the National Privacy Officer.
- f. The NPO and Participating Agencies will take appropriate measures in response to a complaint or challenge, including as necessary a revision to the *National HSPnet Policies*. The NPO will relay the measures taken or proposed, back to the student within one month of their original complaint or challenge.

Resources

- *Identified Purposes and Handling of Personal Information in HSPnet*
- *Policy 3.1 - Accountability*
- *Role Description – Privacy Officer*

Section 3: Privacy, Security and Data Access

Policy No. 3.6: Access to HSPnet Data

Purpose

To ensure appropriate access to HSPnet data by HSPnet users and external requesters.

Principles (based on the 10 Principles of the CSA Model Code)

- An organization is responsible for PI under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the CSA Model Code principles.

Definitions

HSPnet user – An individual with an active HSPnet User ID who may access data as determined by his/her access rights (set by a Local Administrator) as appropriate for his organizational role.

External Requester – An individual or agency that makes a request for HSPnet data but does not have any HSPnet users on staff.

Policies

1. The NDSC, in consultation with local Data Stewardship Committees, will establish a process to guide consideration of requests for access to data at all levels, and will conduct an annual evaluation of the effectiveness of that process.
2. A Data Sharing Agreement between PHSA and each Lead Agency, on behalf of Participating Agencies, will be established to document the respective rights and responsibilities of parties in contributing, protecting, and enabling access to HSPnet data.
3. The Alliance will approve policies that permit access to data by Lead Agency representatives. Access will be limited to data that is required to support their mandate as a Lead Agency including managing the HSPnet-XX budget and local cost recovery, communicating with users, and participating in practice education initiatives (e.g. capacity development, improving data quality).

Procedures

- a. The NDSC will oversee an approval process that is based on the Data Access Approval Guidelines at the end of this Policy. The NDSC and local Data Stewardship Committees will conduct an annual review of the outcome of requests considered through the Approvals Process, and if necessary advise the NHASC on the need to revise this Policy and/or the Approvals Process.
- b. One or more HSPnet users may request of a custom report by submitting a request via the Custom Report Queue in HSPnet. The HSPnet Help Desk will review the request against the Data Access Approval Guidelines and deliver the completed report if authorized by the guidelines, or will seek approval from the NPO or from the local Data Stewardship Committee or from the NDSC if no local committee exists or the data request spans provincial boundaries. Requests that require committee approval should be documented using the *Data Access Request Template for Data Stewardship Committees* (<http://www.hspcanada.net/privacy/resources.asp>).
- c. If a Custom Report has ongoing value to other HSPnet users, the HSPnet Team Leader may publish the report as a new pre-defined report to the Reports Menu, in accordance with the Data Access Approval Guidelines.

- d. Cross-agency access may be permitted when partnering agencies have entered into a formal agreement compliant with the jurisdiction's privacy legislation, the provincial Privacy Impact Assessment and the National HSPnet Policies.
- e. When presenting or distributing data that was received under policy 3.6.3, Lead Agencies will follow the Data Access Approval Guidelines. For example, a Lead Agency may:
 - Distribute agency-specific data to representative of that agency, if the data is within the scope of the representative's organizational role; or
 - Distribute cross-agency data if a one-time or standing agreement exists from all agencies who contributed the data.
- f. Jurisdictions will ensure that student data sharing agreements are in place when two or more educational programs operate under a collaboration or affiliation arrangement (whereby students transfer from one educational institution to another during completion of their program). The Student Consent form for students who are enrolled in such collaborative or "transfer" programs will include a reference to the potential need to transfer a copy of their PI from the "starting" educational institution to their "ending" institution within the program.
- g. On an annual basis, the Alliance will review and update a list of standard extracts available to the Lead Agencies as consistent with their provincial mandate.

Resources

- *Terms of Reference – HSPnet Data Stewardship Committee*
- *Provincial Collaborative Agreement (Province & PHSA)*
- *Procedure: HSPnet-XX Lead Agency Access to provincial data*

Data Access Approval Guidelines

Level of Requester	Type of Request and Example(s)	Approval Process
Non-Identifiable Data (student personal information removed)		
HSPnet users	Placement Data <ul style="list-style-type: none"> List of students on my unit next month Placement hours per student in my allowed educational programs 	<ul style="list-style-type: none"> Pre-defined reports and customizable report wizards will be made available within the HSPnet Reports menu, available to authorized HSPnet users as permitted by their access rights. Requests for data that are not available from a pre-defined report or wizard may be submitted via the Custom Report Queue in HSPnet. The requested data will be released by the HSPnet Team if the data is within the requesting user's access rights and is consistent with the permitted uses of data (e.g. a list of supervisors for purposes of preceptor recognition).
	Cross-Department Data <ul style="list-style-type: none"> Comparison of placement hours across multiple departments or programs not within my access rights 	Data requests to be approved by NPO if the data requested is within the scope of the requester's role in their agency
User Agencies (individuals who are not an active HSPnet user but who are authorized representatives of an agency that uses HSPnet)	Agency-Specific Data <ul style="list-style-type: none"> # of Placements in all departments in my agency 	Data requests to be approved by NPO if the data requested is within the scope of the requester's role in their agency
	Cross-Agency Data: agency non-specific <ul style="list-style-type: none"> List of all LPN nursing placements in BC 	Data requests to be approved by the NPO if the data requested is specifically related to the requester's role in their agency and the data will provide information that would otherwise be publicly available
	Cross-Agency Data: agency-specific <i>Placements involving multiple schools as members of a committee or collaborative (e.g. Nursing Interschool in BC, Ottawa region's Clinical Resource Committee)</i> <i>Pediatric placements across multiple Placing or Receiving agencies</i>	Data requests to be approved by: <ul style="list-style-type: none"> the local Data Stewardship Committee or NDSC; OR the NPO if all agencies that contributed the data provide agreement by email/letter to generate the combined report on a one-time or ongoing basis
Non-Identifiable Data (student personal information removed)		
External Organizations (non-users of HSPnet)	Aggregate Data: Government and Policy organizations may be granted access to aggregate (de-identified) data as available within the Policy Access Level (PAL) module of HSPnet. ¹	PAL user ID's to be approved by the Lead Agency.
	Non-aggregated Data: Limited to agency program- or site-identified data; no personal identifiers	Data requests to be approved by: <ul style="list-style-type: none"> the local Data Stewardship Committee or NDSC; OR the NPO if all agencies that contributed the data provide agreement by email/letter to generate the combined report on a one-time or ongoing basis
Identifiable Data (student personal information included)		
All Requesters	All Requests	Data requests to be approved by the local Data Stewardship Committee or NDSC

¹ PAL access allows generation of aggregate data on placement activities and related information, based on data for which all personal identifiers (student/staff) and agency identifiers (Placing or Receiving Agency, program, site) have been removed.

Section 4: HSPnet Governance and Management

Under Development

Section 5: HSPnet Systems Development

Policy No.5.0: User Reference Group for HSPnet Enhancements

Purpose

The User Reference Group is a voluntary consultative resource to the HSPnet development team in the development, assessment and evaluation of enhancements and/or process changes.

Principles

Requests for new enhancements should be assessed against the following principles.

- **Alliance with Alliance Strategy** and Risk Management Plan - including issues of privacy, data quality, and system performance.
- **Functionality** - the enhancement should not unproductively duplicate other systems.
- **Financial Impacts** - research and document the one-time and ongoing cost impacts
- **Compliance with national policies** - Research the privacy and legislative considerations as needed. Consider non-HSPnet policy issues and requirements, before and after implementation.
- **Equity** - design enhancements to be as generic as possible to maximize benefits across users, disciplines and jurisdictions. Consider both Placing and Receiving agencies and other scenarios.

Definitions

Enhancement: may be an improvement or expansion of an existing functions, addition of new data fields, addition of rules that enforce use or fields or features or of new modules.

- **Class 1 Enhancement:** *Minor fixes or changes to maintain or improve HSPnet functionality which does not require consultation from users.*
- **Class 2 Enhancement:** *Planned enhancements, identified on an ongoing basis by HSPnet users or other stakeholders*
- **Class 3 Enhancement:** *Specially funded enhancement projects by provincial lead agencies outside the national budget.*

User Reference Group: a volunteer group of HSPnet users, who, on occasion, are consulted for input and assessment of enhancement ideas.

Procedures

HSPnet-XX Management Committees will identify individuals to participate on the User Reference Group. Participants should experience with using or overseeing use of HSPnet features, and should be able to objectively assess and make recommendations on behalf of other users in their role.

The selected participants would be part of an informal user reference group (URG) composed of users representing both Placing and Receiving agency sectors.

Resources

Enhancement Request Form

Section 6: Training and Support

Policy No. 6.1: HSPnet Training

Purpose

To ensure cost-effective access to high quality training for HSPnet users.

Principles

- All users of HSPnet should receive a standardized minimum of training before being granted an HSPnet user ID, including:
 - Privacy and security of PI (as required to meet local legislative requirements and commitments of the PIA in all provinces)
 - HSPnet navigation (characteristics of web-enabled applications, saving changes, etc.)
 - Access to online resources and Help Desk
- HSPnet Training should be designed and delivered to meet the varying needs of different user levels
- HSPnet Training should be delivered by the most cost-effective mechanisms that ensure:
 - User satisfaction and self-assessment of competency to continue independently
 - User proficiency levels that minimize errors and/or ongoing use of Help Desk
 - Opportunities for user feedback during training, thereby ensuring that HSPnet functionality continues to evolve and meet user needs.
- User Agencies are responsible for effective utilization of Training resources through:
 - Advance registration and provision of adequate information to allow setup of trainee information prior to training;
 - Compliance with policies and procedures regarding attendance, cancellation, and completion of pre-training requirements;
 - Trainee compliance with rules of conduct during HSPnet training (respect for fellow trainees, completion of pre-training requirements, etc.)
 - Timely payment of training fees that may be established by the HSPnet-XX Management Committee for each jurisdiction, such as fees for late cancellation or “extra” training outside of the approved annual budget.

Policy

1. In consultation with the HSPnet-XX Lead Agency or Provincial Coordinator, the HSPnet team will maintain a Training Plan in each jurisdiction as appropriate for all active users, encompassing:
 - Effective processes for registration, trainee communications, and distribution of pre-training instructions and materials;
 - Detailed training curricula (learning objectives, resources, activities);
 - Training materials including course outlines, worksheets, quick reference guides, and handouts;
 - e-Learning resources to provide standardized background content, ongoing access to refresher opportunities, and an alternative to classroom training as appropriate.
2. The HSPnet team will evaluate and report on the effectiveness of training activities on an annual basis, such as measures of user/trainee satisfaction, user proficiency, ongoing use of Help Desk resources, and Participating Agency compliance with policies and procedures.

Procedures

- a. The HSPnet team will ensure that a Training Plan is updated annually and published, along with associated documents and materials, on the public website.
- b. The HSPnet team will report on an annual evaluation of training utilization and effectiveness to the NHASC and to each provincial Management Committee.
- c. The HSPnet team will report annually regarding Participating Agency compliance with this Policy including attendance rates and late cancellation or no-show rates and associated impacts.
- d. The Management Committee or Lead Agency for each jurisdiction will have the option to set an HSPnet-XX Fee Schedule to recover costs for training activities outside of the annual approved budget. Such fees would reflect the fact that the National HSPnet Alliance operates on a cost recovery basis, and fees may therefore be necessary to cover costs such as:
 - “Extra” training for any User Agency wishing to fund additional training due to high staff turnover, customization to support unique organizational processes, etc.;
 - Charges for late cancellation and “no show” registrants (to be defined by National HSPnet Director and reviewed annually);
 - Training binders and other materials;
 - Partial or full recovery of training costs to offset the jurisdiction’s annual operating budget.

Resources

- *HSPnet-XX Fee Schedule*

Section 7: Language Duality

Policy No. 7.0: General

Purpose

To ensure equitable access to HSPnet functionality and support for users in both official languages of Canada.

Principles

- All users of HSPnet should have access to training and support in the language of their preference (French or English).
- HSPnet should function effectively and at an equivalent level for Anglophone, Francophone and bilingual users.

Policy

1. The HSPnet team will strive over time to recruit bilingual staff/contractors and to develop bilingualism in all team members.
2. PHSA will advise the Alliance on ongoing practices and needs to ensure that HSPnet meets its language duality commitments.
3. PHSA will ensure that all formally published documents are made available in both official languages on the public website and for user distribution.
4. Time-limited or project-specific documents (e.g. an enhancement funded and led by one organization or a province) may be published on the public website in the preferred language of the lead jurisdiction if project funding is not available to support translation to both languages during project planning and development stages.

Procedures

- a. PHSA and the HSPnet team will ensure that the Training Plan addresses the needs of all HSPnet users in an equitable fashion, including evaluation of training utilization and effectiveness.
 - b. The HSPnet team maintain a Help Desk staffing and development plan to deliver an equitable standard of response to all users in their preferred language.
 - c. For project-specific or time-limited documents, PHSA or the HSPnet team will publish a summary statement of the project or initiative in both official languages for the benefit of all HSPnet users and interested audiences.
- Any organization or jurisdiction wishing to ensure that their users can follow and/or participate in a project in their preferred language may volunteer resources (translation services or funding) to facilitate translation of key documents throughout the project. For example, a bilingual member of a project team may offer to translate Meeting Notes and Requirements Specifications into the other language.
 - Upon project completion any documents with ongoing value, including final versions of key project documents and all instructions for implementing and using the new enhancement, would be translated and published in both official languages.

GLOSSARY OF ACRONYMS

Acronym	Description
NDSC	National Data Stewardship Committee
NHASC	National HSPnet Alliance Steering Committee
NPO	National HSPnet Privacy Officer
PHSA	Provincial Health Services Authority
PI	Personal Information
PIA	Privacy Impact Assessment