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## Revision History

Version Date	Summary of Changes
2005	Original Document
May 23, 2017	Added definitions list and updates regarding the College's collection, use and disclosure of personal information.

## Definitions

College	Alberta College of Paramedics
CASL	Canada's Anti-Spam Legislation, SC 2010, c 23, as amended from time to time
Applicant	An individual applying for registration with the College and/or writing the provincial exam
Consent	The level of consent (express, implied, opt-out) needed in order to collect, use or disclose Personal Information
Express Consent	Consent that is provided in writing or verbally
Health Information	Diagnostic, treatment and care information as defined by Alberta's Health Information Act, RSA 2000, c H-5, as amended from time to time
HPA	Alberta's Health Professions Act, RSA 2000, c H-7, as amended from time to time
Implied Consent	Consent obtained when information is volunteered for a particular purpose and a reasonable person would volunteer that information
Opt-out Consent	Consent obtained when an individual is given a choice to opt out of the collection, use or disclosure of their Personal Information in so far as it does not prevent the College from meeting its regulatory responsibilities and the individual chooses not to do so
Personal Information	Includes name, contact information, identification number and any other information about an individual where the information can be used to identify the individual
PIPA	Alberta's Personal Information Protection Act, SA 2000, c P-6.5, as amended from time to time
PIPEDA	Canada's Personal Information Protection and Electronic Documents Act, SC 200, c 5, as amended from time to time
PPR	Alberta's Paramedics Profession Regulation, Alta Reg 151/2016, as amended from time to time
Practitioner	A regulated member of the Alberta College of Paramedics
Registration Information	Includes information defined in s. 33 and s. 119 of the HPA
Vendor:	Third party agency the College has a contract with to provide services related to its regulatory responsibilities and/or operations.

## Purpose and Application

The College recognizes the value and importance of protecting Personal Information entrusted to it. This policy addresses:

- Personal Information provided to the College by Practitioners, Applicants and members of the general public;
- policies and practices with respect to the College's collection, use and disclosure of Personal Information; and
- how Personal Information that is in the custody or control of the College may be accessed.

The College is committed to only collecting, using and disclosing Personal Information for purposes that are reasonable. This policy primarily applies to Personal Information collected, used or disclosed by the College for the purpose of meeting its regulatory requirements under the HPA.

This policy does not address:

- Personal Information contained in a public record of a Hearing Tribunal or Complaint Review Committee; or
- employee or potential employee Personal Information.

## Security of Personal Information

The College protects Personal Information under its custody or control with an integrated system of firewall and management tools in order to prevent the loss, misuse, unauthorized access, disclosure or alteration of Personal Information. The College uses Secure Socket Layer (SSL) to gather and securely transmit information. Data is redundantly stored on multiple encrypted servers and backed up daily. A weekly rotational back-up is completed as a fast way to restore service for business continuity purposes. Network security is constantly monitored and reviewed regularly.

The College limits access to Personal Information to those that have a business need. There are times when Personal Information may be disclosed without consent or accessible for the purpose of working with external consultant/contractors in accordance with the *Health Professions Act (HPA)*, *Paramedics Profession Regulation (PPR)* or other legislative authorities. The College ensures to the greatest extent possible that its employees and vendors comply with these policies and practices, the relevant legislation and/or agreements in place between the College and the Vendor.

The College does not keep Personal Information any longer than necessary to meet the purpose for which it was collected or some other purpose for which its use is authorized under PIPA.

## Consent

The College will only collect, use or disclose the Personal Information of an individual where it has the Express Consent or the Implied Consent of the individual to do so or where:

- the collection, use or disclosure of the Personal Information is authorized or required by the HPA or the PPR (ss. 14(b), 17(b) and 20(b) of PIPA), or
- the collection, use or disclosure of the Personal Information is otherwise authorized (ss. 14, 17 and 20 of PIPA).

The College will offer an individual the choice to withdraw their consent for the collection, use and disclosure of Personal Information if the College does not require the Personal Information for the purposes for which it was collected.

If the College requires the individual's Express Consent, the College will obtain the individual's consent at the time of collection and provide information which can be easily understood regarding the collection, use and disclosure of the information. Consent may be obtained by one or more of the following methods:

- application (paper or electronic)
- in-person
- telephone
- mail
- facsimile
- email

## Collection of Personal Information

Personal information collected by the College is for the purpose of fulfilling its regulatory requirements under the HPA, PPR and day-to-day business operations. Personal information collected by the College includes:

- personal contact information such as mailing address, phone number and email address;
- information submitted when applying for examination, registration or renewal of practice permit including but not limited to education information, written references, employment, criminal record information, health information, exam results and verification of registration with other regulators;
- financial information such as credit card numbers;
- copies of driving license, marriage certificate or birth certificate;
- information received and obtained as result of a complaint;
- exam records (e.g. marking sheets, audio/video recordings and results) during testing process;
- Continuing Competence documentation – certificates and feedback;

- communication records (e.g. written correspondence) with College regarding regulatory matters;
- requests for access to information; and
- visitor information (e.g. name/car model/purpose) when visiting the College office.

## Use of Personal Information

The College uses Personal Information primarily for the purpose of fulfilling its regulatory requirements set out in the HPA and PPR. Personal Information will only be used for the purpose for which it was collected or where the purpose is otherwise authorized (s. 17 of PIPA). Personal Information may be used by the College for the following purposes:

- determining an individual's eligibility to be registered and/or renewal of Practice Permit;
- determining an individual's eligibility to write the provincial exam and/or obtain special accommodations;
- communicating with applicants and practitioners on regulatory matters (including but not limited to examination, registration, continuing competence and discipline);
- communicating items of general interest related to the profession to practitioners;
- facilitating the collection of feedback from regulated members (e.g. surveys, voting, polls and nominations);
- maintenance of the Registry;
- processing payments;
- processing name change requests;
- processing examination results and exam quality assurance;
- carrying the investigation and appeal processes (e.g. related to a complaint);
- processing requests for and access to information under HPA or PIPA;
- carrying out reviews of College programs and/or practice for purpose of research, evaluation and quality improvement;
- monitoring completion of continuing competence activities; and
- to record guests attending at College office for security and emergency response purposes.

## Disclosure of Personal Information

The College collects and uses Personal Information for internal purposes and Personal Information is only available to College employees, Council or Committee members who may require access to such Personal Information in order to support the College's operations.

There are times when Personal Information may be disclosed by the College without the individual's Express Consent. In such cases, only the minimum amount of Personal Information required to meet the purpose is disclosed. This type of disclosure includes but is not limited to:

- information with respect to status of registration/practice permit:

- verification of registration/practice permit, including discipline information, to employers or public pursuant to HPA,
- to employers and, when applicable, other regulators and governing bodies if an individual's practice permit is suspended, cancelled or conditions imposed pursuant to HPA,
- Minister of Health (workforce planning/Alberta Provider Directory) pursuant to HPA, and
- College's on-line public registry pursuant to HPA;
- disclosure of contact information and other relevant information to contracted investigator for the purpose of conducting an investigation into a complaint;
- disclosure of examination marking sheets to contracted psychometrician for scoring purposes;
- facilitate payment of practitioner's fees by a third party;
- transfer of information to service providers for purposes including, but not limited to, email distribution, survey administration or election administration;
- to determine the individual's suitability to receive an honour or award;
- contracted IT professionals/agencies may have access to information for purpose of providing the College with technical support;
- contracted accountant may have access to information for purpose of conducting annual financial audit; and
- in accordance with s. 20 of PIPA, where information may be disclosed without consent.

### Disclosure of Personal Information Outside of Canada

The College may utilize Vendors located outside of Canada for the purpose of delivering the jurisprudence exam which is designed to evaluate an Applicant's awareness and knowledge of provincial and federal laws, provincial and regulatory standards, and regulatory policies that directly relate to the practice of paramedicine in Alberta.

The College will only disclose an Applicant's first name, last name and email address to the Vendor for the purpose of setting up a profile on an external online system. The external online system provides the Applicant with access to the College's jurisprudence exam. All exam results will be sent directly to the College. Use of the Applicant's personal information by the Vendor is limited to delivery of the jurisprudence exam as authorized by the College.

Upon request by the College the Vendor shall destroy all or such part of the Applicant's information. Upon completion of services the Vendor will destroy all Personal Information as directed by the College.

The collection, use and disclosure of the Applicant's Personal Information by the Vendor will be governed by the terms of an agreement between the College and the Vendor which requires the Vendor to acknowledge and be governed by PIPA, PIPEDA and CASL.

Before disclosing an Applicant's Personal Information to a Vendor outside of Canada, the College will obtain the Express Consent of the Applicant to do so.

The College will provide the Applicant with a copy of this Policy along with the title the College official who is able to answer questions about the collection, use disclosure or storage of personal information by service providers outside Canada.

### Access to Personal Information

An individual may request access to their Personal Information held at the College or information on how the College uses or discloses their Personal Information. Requests for access to Personal Information are to be submitted using the [applicable form](#).

In some circumstances, the College may refuse to provide access (s. 24(2) of PIPA). Examples of types of Personal Information that the College may be unable to provide access to include:

- information that is collected for the purpose of an investigation or legal proceeding;
- notes that aid in the review or development of an official decision and reasons document; and
- clinical scoring sheets from the Provincial Registration Exam as release would jeopardize the integrity of the provincial registration exam.

Requests for access to Personal Information are to be submitted using the [applicable form](#).

On receiving a request to access Personal Information, the College will make every reasonable effort to assist and to respond within 45 days. Any extension beyond 45 days, if required, will be in accordance with extension provisions outlined in PIPA. The response will advise:

- if access to the information will be provided;
- when access will be provided;
- if any information will not be disclosed, provide reasons, who can answer any questions or right to request a review; and
- provide advance notice if there are any fees associated to providing access to the personal information. Fees may include costs associated to photocopying, administrative costs or file retrieval, etc.



## Personal Information Corrections

An individual may also request that their Personal Information be corrected. Requests to correct Personal Information are to be submitted using the [applicable form](#). On receiving a request to correct Personal Information, the College will make every reasonable effort to assist and respond within 45 days. Any extension beyond 45 days, if required, will be in accordance with extension provisions outlined in PIPA.

## Questions/Concerns

If an individual has any questions or concerns regarding the College's privacy policy and/or practices, inquiries may be made to:

Privacy Officer  
Alberta College of Paramedics  
#220, 2755 Broadmoor Blvd.  
Sherwood Park, AB T8H 2W7  
Telephone: 780-449-3114  
Toll free: 1-877-351-2267  
Fax: 780-417-6911  
Email: [privacy@collegeofparamedics.org](mailto:privacy@collegeofparamedics.org)