



SCPP Privacy Policies

The Saskatchewan College of Pharmacy Professionals (SCPP) has developed these policies to comply with our ethical obligations, the *Personal Information Protection and Electronic Documents Act* (Canada) and the *Health Information Protection Act* (Saskatchewan).

General

1. In these policies:
 - a) “Act” means *The Pharmacy and Pharmacy Disciplines Act* and any amendments thereto;
 - b) “College” means the Saskatchewan College of Pharmacy Professionals; and
 - c) “Information” includes:
 - i. Personal health information which means any health related information about an identifiable individual;
 - ii. Personal information which means any information about an identifiable member, intern, or prospective member or intern; and,
 - iii. Pharmacy information which means any information about an identifiable pharmacy and its proprietor.
 - d) “Retention period” means the period of time that trustees are required to retain records containing personal health information pursuant to the regulations under the *Health Information Protection Act* (i.e. six years, or for minors the age of majority plus two years, or as may be amended in the regulations, from the date of receipt).
2. College employees, members of Council, committees and appointees are expected to adhere to these policies that require the safeguarding and proper use of information and may have access to and collect, use or disclose information as approved by the Registrar.
3. Privacy policies concerning information collected, used or disclosed during the course of fulfilling our legislated mandate shall be disclosed in writing to the affected party.
4. The College shall provide information about its privacy policies and procedures upon request.
5. The College shall protect information against accidental or malicious disclosure, modification, removal or destruction.
6. The College office shall be locked at all times that it is not regularly open for business.
7. The College shall maintain a security system for its office that shall be alarmed at all times after regular daily business hours.
8. Documents containing information shall be stored in cabinets capable of being secured or located in an area of the office that is capable of being secured, and such cabinets shall be located in an area of the office with fire protection systems.
9. Electronic files containing information shall be stored on the College server and secured to prevent unauthorized access. Electronic files on portable computers shall be secured with a user name and password.

10. The College's server shall be backed up daily with the back-ups stored in the College's fire-rated safe and that monthly one of the daily back-ups be stored off site at a secure location.
11. The College shall retain on file for the retention period defined herein, all requests for information or access to information, consents and revocation of consents.
12. College staff will be trained on these policies and any amendments thereto, and shall be required to execute a declaration promising to comply with these policies.

Personal Health Information

1. Except where authorized by law, personal health information may not be collected, used or disclosed without the express written consent of the subject individual.
2. Collection, use and disclosure related to a complaint shall comply with the Act and bylaws of the College. Specifically, personal health information may be disclosed without consent to the Council, the Complaints and Discipline Committees and related College staff and Solicitors and consultants so that they may discharge their duties.
3. The Act and bylaws authorize designated College staff to access personal health information while conducting routine pharmacy and professional practice evaluations or inspections in pharmacies. These staff shall not disclose such information any further without the expressed written consent of the subject individual and such consent shall specify the information to be disclosed.
4. The College keeps documents and other material such as exhibits like prescription containers that may identify a patient on file in secure areas that are only accessible to authorized staff. The original documents and materials are kept in these files until the matter in question is resolved. At that time, original documents and materials, where appropriate, are copied and returned to their source. For example, original letters of complaint are returned to the complainant, or prescription documents seized during an inspection or investigation of a complaint are returned to the pharmacy.
5. The copies of original documents and materials are kept on file in secure areas accessible only to authorized staff for the retention period defined herein from the date the matter in question is resolved. After that, these copies are destroyed in a secure manner such as shredding.
6. Personal health information retained electronically is secured on the College server accessible only to authorized staff. Data on the server is backed up in a secure manner and the back-up media are stored in secure locations to prevent unauthorized access or damage. Personal health information retained electronically is securely destroyed after the retention period defined herein from the date the matter in question is resolved.
7. Any member of the public who believes that we are retaining their personal health information, may have access to it, or may place limits on how the College uses or discloses this information by submitting a request in writing. The College will keep such requests securely on file for the retention period defined herein.
8. Any other inquiries regarding the privacy of personal information and our privacy policies should be directed to the Registrar.

Personal Information

1. The College may collect the following information about a member, intern, or prospective member or intern:
 - a) demographic – title, name, date of birth, place of birth, home address, alternate address, home telephone number, home fax number, e-mail address, gender;
 - b) education – educational certificate, diploma or university degree(s) and the institution from which these were granted, date of graduation, Pharmacy Examining Board of Canada registration number, internship or practical training time served, and any other educational qualifications related to the profession;
 - c) registration or membership status – registration or membership category, classification or sub-classification, condition or restriction on practice, competency information, complaint or discipline information, current or past registration or membership with other jurisdictions;
 - d) practice – place of practice, and the name, address, e-mail address, telephone number, fax number of employer;
 - e) professional competency – continuing education or professional development activities or programs being undertaken or completed, and any competency assessment undertaken or completed and the results thereof;
 - f) records of achievements and awards including the personal information related thereto;
 - g) records of service to the College;
 - h) affiliations with professional and other organizations; and,
 - i) any other information deemed necessary to fulfill the College's obligations under the Act.
2. The College may use personal information for the purpose of registering that individual, renewing the membership and to maintain registers and records to be kept by the College. The College may also use registration or membership status information for conducting the affairs of the College that is required under federal and provincial legislation. For example, the College may share a member's status with a licensed dealer to verify eligibility to order Controlled Substances.
3. The Act requires the Registrar to comply with a request from any person to inspect the information contained in the Register established pursuant to the Act. This "Public Register" includes disclosing the name, address (practice or employment site only) and registration or membership category of every member or intern. Under the Act, the College must also annually file this "Public Register" with the government to which we are required to include each member's initial registration date. **The College will not disclose any other personal information unless the member or intern provides express written consent.**
4. The College discloses personal information to external public registry compilers for the purpose of ensuring the integrity of public registry databases. The College permits such compilers to only disclose the same information that appears in the "Public Register".
5. The College discloses registration or membership status information for a variety of purposes consistent with administration of the Act. One purpose is to publicize an order made by the Discipline Committee. Examples of other purposes include confirmation of

registration and membership status to:

- a) the College of Pharmacy and Nutrition, University of Saskatchewan for education, training and research;
 - b) other regulatory authorities;
 - c) third party payers;
 - d) drug distribution centers (drug wholesalers and manufacturers); or,
 - e) any member of the public or press.
6. Consent of the member or intern is not required for the collection, use and disclosure of personal information that the College is required to obtain by legislation. The College will not disclose a member's or intern's home address, home telephone or fax number, or personal e-mail address without expressed written consent of the member or intern.
 7. With expressed written consent of the member or intern, the College may disclose personal information for the following purposes:
 - a) professional development and education;
 - b) practice based information or research;
 - c) health promotion programs;
 - d) Health Canada notices;
 - e) human resource or workforce research, planning and management; or,
 - f) for consideration of the member for an award.
 8. A member or intern may at any time withdraw consent to the disclosure of personal information by giving written notice to the College. Such withdrawal of consent cannot be retroactive.
 9. A member or intern upon giving the College reasonable notice may access any personal information on file about himself or herself,
 10. A member or intern may challenge the College's compliance with these policies by submitting a complaint to the Registrar. Complaints that are not handled to the member's or intern's satisfaction may be appealed to the Council of the College,
 11. The College may sell aggregate "Public Register" information to those who serve the professional needs of the member or intern,
 12. When a member ceases to be a member or is deceased, this information shall be recorded on the "Public Register" according to the manner in which the College is required to report such information pursuant to the Act. Under these circumstances, electronic and paper files containing personal information shall be archived for an indefinite period of time. Access to such archived files shall only be permitted for legitimate purposes upon approval of the Registrar.

Pharmacy Information

1. The College may collect the following information about a pharmacy or its proprietor:
 - a) name, trade name or other names associated with the proprietor or pharmacy;
 - b) address, including mailing, location and e-mail;

- c) employee pharmacists, including the pharmacy manager;
 - d) directors if appropriate;
 - e) telephone and fax numbers;
 - f) hours of operation;
 - g) internet name and address; and,
 - h) any other information deemed necessary to fulfill the College's obligations under the Act.
2. The College may use pharmacy information for the purpose of granting or renewing a permit, and to maintain registers and records to be kept by the College. The College may also use such information for conducting the affairs of the College that is required under federal and provincial legislation.
 3. The Act requires the Registrar to comply with a request from any person to inspect the information contained in the Register established pursuant to the Act and to annually file this Register with government. This "Public Register" includes disclosing the name and address of every pharmacy, its manager and proprietor. To confirm identity as part of the registry data the College also discloses the pharmacy number.
 4. The College discloses pharmacy information to external public registry compilers for the purpose of ensuring the integrity of public registry databases.
 5. The College discloses pharmacy information for a variety of purposes consistent with administration of the Act. One purpose is to publicize an order made by the Discipline Committee. Examples of other purposes include confirmation of the pharmacy's status to:
 - a) the College of Pharmacy and Nutrition, University of Saskatchewan for education, training and research;
 - b) other regulatory authorities;
 - c) third party payers;
 - d) drug distribution centers (drug wholesalers and manufacturers); or,
 - e) any member of the public or press.
 6. Consent of the proprietor is not required for the collection, use and disclosure of pharmacy information that the College is required to obtain by legislation. The College may disclose without consent pharmacy information for the following purposes:
 - a) Professional development and education;
 - b) Practice based information or research;
 - c) Health promotion programs;
 - d) Health Canada notices; or,
 - e) Human resource or workforce research, planning and management.
 7. The proprietor upon giving the College reasonable notice may access any pharmacy information on file about his pharmacy.
 8. A proprietor may challenge the College's compliance with these policies by submitting a complaint to the Registrar. Complaints that are not handled to the proprietor's satisfaction may be appealed to the Council of the College.

9. The College may sell aggregate “Public Register” information to those who can demonstrate a legitimate need for such information to serve the needs of the pharmacy.
10. When a pharmacy ceases to operate, this information shall be recorded on the “Public Register” according to the manner in which the College is required to report such information pursuant to the Act. Under these circumstances, electronic and paper files containing pharmacy information shall be archived for an indefinite period of time. Access to such archived files shall only be permitted for legitimate purposes upon approval of the Registrar.