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Revision History

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<td>2005</td>
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<tr>
<td>May 23, 2017</td>
<td>Added definitions list and updates regarding the College’s collection, use and disclosure of personal information.</td>
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<tr>
<td>July 25, 2018</td>
<td>Added section on Disclosure of Hearing Information and Decisions. Updated section regarding disclosure of personal information outside of Canada.</td>
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Definitions

College  Alberta College of Paramedics
CASL  Canada’s Anti-Spam Legislation, SC 2010, c 23, as amended from time to time
Applicant  Individual applying for registration with the College and/or writing the provincial exam
Consent  Level of consent (express, implied, opt-out) needed in order to collect, use or disclose Personal Information
Express Consent  Consent specifically 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 not expressly granted, but rather implicitly granted by a person’s actions and the facts and circumstances of a particular situation
Opt-out Consent  Giving consent by not declining to give consent when an individual is given a choice to opt out
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 2000, 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 contracted to provide services related to the College’s business
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 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:
Privacy Policy

- 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 Hearing Information and Decisions
The College publishes hearing information and discipline decisions to ensure disciplinary processes and outcomes are accessible to the public, in a manner that balances the value of transparency with the need to safeguard sensitive/personal information. Information published includes:

- Scheduled hearing information, including the name of the practitioner, nature of allegation, date, time, location and status of the hearing
- Hearing Tribunal Decisions, the written decision of the Hearing Tribunal will be posted for a minimum of five years.
- Council Appeal Decisions, the written decision of Council based on an appeal of the decision of a Hearing Tribunal, posted for a minimum of five years.
- Alberta Court of Appeal Decisions, the written decision of the Alberta Court of Appeal based on an appeal of a decision of Council following a Hearing Tribunal decision, posted for a minimum of five years.

The College’s Publishing of Hearing Information and Decisions policy is available by request. Decisions may be redacted to safeguard sensitive personal information and/or the personal information of third parties.
Disclosure of Personal Information Outside of Canada

The College strives to engage service providers that are based in Canada wherever possible; however, it may from time to time be required to engage service providers located outside of Canada for the purpose of delivering a business required service. The College will disclose limited and specific information necessary to achieve the stated business objective.

For example, the College uses a vendor to deliver the jurisprudence exam. Applicants’ first names, last names and email addresses are provided to the vendor to facilitate this process. The collection, use and disclosure of the applicant’s personal information by the vendor is governed by the terms of agreement between the College and the vendor, which requires the vendor to acknowledge and be governed by PIPA, PIPEDA and CASL.

Before disclosing personal information to a vendor outside of Canada, the College will notify the individuals affected and, if required, obtain the express consent of the individual to do so.

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.
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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