

COLLECTION AND USE OF PERSONAL INFORMATION POLICY



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DATE APPROVED: December 2016

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DISTRIBUTION: NSAMRT Registrants

COMMITTEE: Policy and Procedures Committee

DATE(S) REVIEWED (REVISED): XXXX

ISSUING AUTHORITY: NSAMRT Board

APPROVAL: 

PERSONAL INFORMATION

Personal information is defined as “information about an identifiable individual”, such as a home address (1). It is considered separate from business information, such as an individual’s business address, which is not protected by privacy legislation.

POLICY

The purpose of this policy is to identify the type of information that will be collected and stored by NSAMRT, who will have access to the information, and how personal information will be protected.

The purposes for which personal information is collected will be disclosed by NSAMRT at or before the time the information is collected. The collection of personal information will be limited to that which is necessary for the purposes identified by NSAMRT. Information will be collected by fair and lawful means and comply with the NSAMRT Act and Regulations. Personal information will 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. Personal information will be retained only as long as necessary for the fulfillment of these purposes.

RATIONALE

The NSAMRT’s principle responsibility is to serve and protect the public interest. In the course of fulfilling its mandate, the NSAMRT may collect, use and disclose personal information about its registrants and prospective registrants. The NSAMRT is committed to the privacy of its registrants and prospective registrants and to regulating access to personal information. This Collection and Use of Personal Information Policy will facilitate the proper collection, use and disclosure procedures.

PROCEDURE

Information Collection

The College collects the information that it requires for it to carry out its functions, which include:

- Assess whether applicants meet the initial requirements for registration within the College
- Complete entries in the College's Register of registrants
- Assess whether applicants are eligible to have their practice permit renewed or reinstated
- Communicate with registrants about registration, discipline, or other matters in relation to the regulation of the profession
- Provide information to registrants
- Facilitate payment of fees
- Facilitate complaints
- Carry out functions related to registration, discipline or professional regulation (1)
- Comply with FRPA requirements

The College collects personal information from its registrants to keep in its Register. In addition to the name of each person eligible to be registered, as required by subsection 12(1) of the Act, the Register must contain the following:

- Contact information, including address and telephone numbers
- Name and location of educational institution attended, as well as year of graduation
- Date of successful completion of registration examination
- Date of entry in register
- Registrant number
- Specialties/subspecialties
- Restrictions, disciplinary decisions etc
- Financial information such as payment history

The College also collects personal information from complaints, individuals involved in complaints, investigations and discipline proceedings (1).

Information Access

When access is necessary for the performance of their duties, the following people may access registrant information:

- College employees and committee members
- External consultants or a provider of the College who has entered into an agreement to ensure that the confidentiality of personal information is maintained and that there are appropriate security measures in place. For example, a service provider has been contracted by the College to collect, manage, store, analyze and report data related to the College's Continuing Competence Program. Only the personal information required to carry out the specific duties shall be released.

The College may also disclose personal information as authorized by law, including under the following circumstances:

- In response to a subpoena, warrant, or court order
- Pursuant to a lawful request by a government agency
- To report fraudulent activity or other deceptive practices to another professional regulatory body, or to a governmental or law enforcement agency
- To act in urgent circumstances to protect the personal safety of registrants or of the public

Personal information will only be collected, used and disclosed without the knowledge and consent of the individual for the purpose of the administration or enforcement of the legislation and in accordance with any applicable provisions of the legislation.

Any request from an organization or individual for member information for any non-legislative reason including, but not limited to, marketing, philanthropic or educational purposes, must be sent in writing or by email to chair of communications committee. When such a request is made the registrant must be informed and has the right to decline release of personal information. The college has a right to charge a nominal fee for such requests.

Registrant access to his/her personal information:

- Broadly speaking, a registrant has the right to see their personal information that is in the College's possession
- A registrant may document their request to their information in writing or by email to the registrar. The College will provide a response to such a request within 30 calendar days. If the request cannot be fulfilled, the response must be accompanied with an explanation.
- Access may only be denied in certain specific circumstances such as where a member's information would reveal personal information about another individual. The College reserves the right to charge a nominal fee for such requests.
- A member may request to have their information at the College corrected. This applies to factual information and not to any professional opinions formed by the College. The College may ask the member to provide documentation to support the request for change (1)

Privacy Protection

The College has the following measures in place to protect to the privacy of member information:

- All personal information that the NSAMRT possesses will be held in a confidential manner
- Personal information must be password protected or locked in a filing cabinet
- Only staff, committee members, or external consultants requiring personal information to complete their duties will be given access
- Any person who is given access to personal information must sign a confidentiality agreement
- NSAMRT will keep personal information about its registrants as outlined in its retention policy, after which it will be destroyed
- Personal information will be destroyed by shredding a paper copy, or deleting an electronic copy (1)

REFERENCES:

Alberta College of Medical Diagnostic and Therapeutic Technologists. (2014). *Privacy policy*. Retrieved from <http://acmdtt.com/registrants/privacy-policy/>