

## Background

The Health Sciences Placement Network (HSPnet) is a secure web-enabled application developed and managed by the BC Academic Health Council on behalf of its partners in several jurisdictions across Canada. The HSPnet database contains information about students in clinical placements within health agencies. Students authorize their educational program to use and disclose their personal information (name, student profile) and to use (but not disclose) their personal health information via HSPnet for the purpose of locating and coordinating placements as required for their educational program. This document provides a summary of the national HSPnet Policies on Privacy, Security and Data Access, relating to the protection of student information within HSPnet. The complete Policies can be viewed on the HSPnet website at [www.hspcanada.net](http://www.hspcanada.net).

## Collection, Use, and Disclosure of Personal Information (PI) and Personal Health Information (PHI) in HSPnet

HSPnet Policies ensure that PI and PHI in HSPnet:

- Are collected, used, and disclosed only for purposes consistent with identifying and coordinating a student's clinical placements;
- Cannot be used or disclosed without the consent of the student whose PI or PHI is to be collected; and
- Are used by or disclosed only to authorized individuals on a need-to-know basis, by/to staff involved in student placements within the student's educational program or placement site. PHI is never disclosed via HSPnet to users who are external to the student's educational program.

<b>PI Collected</b> <i>May include any or all of:</i>	<b>Uses of PI</b> <i>BY authorized users only within Student's Educational Program</i>	<b>Disclosure of PI</b> <i>TO authorized users only within the Placement Site being asked to accept the Student</i>
<ul style="list-style-type: none"> <li>• Student names</li> <li>• Student home address, phone numbers or email ID</li> <li>• Student number</li> <li>• Student photograph</li> <li>• Placement Preferences (1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> choices if offered)</li> <li>• Student gender – limited to students placed in locations that accommodate patient/ client preference for the gender of their care provider gender (e.g. homecare visits).</li> </ul>	<ul style="list-style-type: none"> <li>• To contact students regarding placement needs or status, or regarding urgent issues such as labour disruption at the placement destination</li> <li>• To generate class placement lists, confirmation notices and schedules</li> <li>• To maintain a student history of placements</li> </ul>	<p>Student name is disclosed upon confirmation of an accepted placement, for the purpose of facilitating placement arrangements (orientation, preceptor assignment) and as a record of students received by the Site. Name may be disclosed, at the discretion of the educational program, prior to acceptance if the Receiving Site has a need to know (e.g. to arrange a student interview, if the student is an employee).</p> <p>No other student PI (besides name) is disclosed under any circumstances, excluding Student gender which may be disclosed on specific request by a placement site that requires this information to accommodate patient/client preference (e.g. homecare visits).</p>
Student Prerequisites as required by Placement Sites (e.g. criminal records check, CPR or other certifications)	To track student compliance with each site's published requirements for criminal records check, CPR certification, etc.	<i>Not disclosed under any circumstances</i>
Student Profile of educational or work history relevant to placement requests	To facilitate a good fit between the student and Placement Site, learning experiences offered, and supervisor/preceptor to be assigned.	

<b>PHI Collected</b> <i>May include any or all of:</i>	<b>Uses of PHI</b> <i>BY authorized users only within Student's Educational Program</i>	<b>Disclosure of PHI</b>
Status of indicators for safety and/or infection control as required by Placement Sites prior to accepting students: <ul style="list-style-type: none"> <li>• Information on a student's immunity or immunization status for vaccine-preventable diseases such as Varicella, Polio, Diphtheria/Tetanus, Influenza, and Measles/Mumps or Rubella</li> <li>• Information on Tuberculosis status including TB test and/or chest X-ray results</li> </ul>	To track status of a student's eligibility according to the requirements of Receiving Agency sites where students may be placed	<i>Not disclosed under any circumstances</i>

### Safeguards

- The accuracy and completeness of personal information within HSPnet is maintained through the use of system tools such as mandatory fields and formatting rules, and through periodic review of data quality to identify the need for interventions including user training and system modifications.
- HSPnet data is physically and logically secured in accordance with industry standards and best practices, including enforcement of strict rules for physical security and backups, password protection at all points of access, and use of anti-virus software, firewall protection, and data encryption.
- Periodic audits of HSPnet transactions are carried out to ensure there are no problems and/or gaps in the user interface that might permit inappropriate access to or update of data.
- Personal information on each student, along with their placement history, is retained for 180 days after the student's completion of or withdrawal from the educational program, and is available to the student upon request to their jurisdiction's Privacy Officer or the HSPnet Privacy Officer.

### Openness, Access, and Challenging Compliance

- The BCAHC provides a mechanism whereby an individual can access their own information as well as a complete description of the type of PI or PHI used/disclosed and the purposes for using or disclosing the information. Such requests can be made in writing by the student to the HSPnet Privacy Officer and/or to the local Privacy Officer within the student's jurisdiction (contact information for each province or jurisdiction is available on the HSPnet website at [www.hspcanada.net/privacy/index.asp](http://www.hspcanada.net/privacy/index.asp)).
- An individual may request changes to their PI or PHI contained in HSPnet, or may register a complaint or challenge regarding the handling of their information in HSPnet by submitting a request in writing to the HSPnet Privacy Officer or local Privacy Officer within their jurisdiction.