



Registered Nurses Association  
of the Northwest Territories  
and Nunavut

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Administration General Policy

Policy Description: Privacy

Policy Number: AG8

**Effective Date:** September 21, 2015

**Signature:**

**Review Date:** September, 2018

**New Policy**

**Revision:** Partial  Complete

**Applies To:** All RNANT/NU Board of Directors, Committees, Executive Director and staff.

**Purpose:** This policy outlines the procedures for collection, safeguarding and use of personal information collected by RNANTNU.

### Policy:

The Registered Nurses Association of the Northwest Territories and Nunavut is committed to ensuring the privacy of its members and protecting all of the personal information shared with us. The *Personal Information Protection and Electronic Documents Act (PIPEDA)* sets out ground rules for how private sector organizations such as RNANT/NU may collect, use or disclose personal information in the course of its activities.

#### (1) Identifying Purposes

The RNANT/ NU shall consider the purpose of the personal information collected prior to, and during the collection. Personal information is collected mainly through the registration and renewal process and is for the primary purpose of determining eligibility for registration. Personal information provided to RNANT/NU by members or applicants may also be used as follows:

- to perform regulatory functions required by the *Nursing Profession Act (2003)*, including processing and approval of applications for examination and review of conduct;
- to provide membership benefits through the RNANT/NU including distribution of the RNANT/NU newsletter, annual report, registration reminders and other communications;
- to provide members of RNANT/NU with membership to the Canadian Nurses Association (CNA). RNANT/NU pays a fee to CNA on behalf of each member and provides names and addresses of all members to CNA for the purpose of distribution of the CNA Journal, and other official CNA communications with members.;
- to provide members of RNANT/NU with liability protection through the Canadian Nurses Protective Society (CNPS). RNANT/NU pays a fee to CNPS on behalf of each member and provides names, contact information and membership information of all members with CNPS in order for members to access its services;
- to provide non-identifying statistics to the Canadian Institute of Health Information;
- to comply with a request from a member to provide verification of membership registration status to other regulatory or educational bodies and/or employers.

All information that is provided to CIHI, CNA and CNPS is governed by privacy restrictions according to the privacy policies of those institutions.



**(2) Consent**

- Consent from individuals for the collection, use or disclosure of their personal information shall be in keeping with the reasonable expectations of the individual, the circumstances of the collection and the sensitivity of the information collected.
- At the time of completing their application form for membership to RNANT/NU, individuals will be asked to provide their express consent to RNANT/NU's collection and use of their personal information for the purposes noted under section 1 above. Application forms will make prospective members aware of the primary purpose of the collection of their personal information and inform them that their information will be shared with CNA, CNPS and CIHI.
- Individuals may withdraw their consent from allowing RNANT/NU to collect or use their personal information. Upon receiving information of non-consent, RNANT/NU's Privacy Officer will contact the individual to maintain services including CNA and CNPS membership.
- There are exceptional circumstances that do not require consent for the collection and use of personal information. The named Privacy Officer will be familiar with those exceptions and can provide information to a member upon request whether any such exceptions are being relied on by RNANT/NU.

**(3) Collection**

Personal information shall be collected for the identified purposes only. The information shall be collected by fair and lawful means. Personal information will be reviewed only by authorized staff and volunteers to fulfill the purpose its original collection.

**(4) Limitation of Use, Disclosure and Preservation**

- Personal information shall only be used for the purposes of its collection. RNANT/NU shall not use or disclose personal information for purposes other than those identified unless additional express consent has been received or where such use or disclosure is required or permitted by law.
- Collected information shall be retained only so long as necessary to satisfy the purposes described herein or where otherwise required by legislation.

**(5) Accurate Information**

- The RNANT/ NU shall make every effort to maintain all records of personal information accurate, complete and up-to-date. Members are expected to update the RNANT/NU with any relevant changes to their personal information.
- Members and applicants can request updates or changes to personal information by contacting RNANT/NU Registration Coordinator.

**(6) Safeguards**

The RNANT/NU shall protect all personal information with appropriate security measures against such risks as unauthorized access, collection, use, disclosure or disposal. Security measures include



but are not limited to:

- Personal information removed from paper files will be shredded and from electronic files permanently deleted;
- computer hard drives will be wiped before they are disposed;
- Personal information shared electronically will be encrypted (e.g. sending membership lists to CNA or CNPS).
- All RNANT/NU employees and any volunteer committee members who have access to nurse's private information must swear an Oath of Confidentiality.

**(7) Privacy Information**

The RNANT/NU shall provide members and the public to access to the RNANT/NU's Privacy Policy.

**(8) Privacy Officer**

The Executive Director is named as the Privacy Officer for RNANT/NU. This designation may be delegated in writing to the Registrar. The privacy officer shall be responsible for administering the RNANT/NU's obligations under PIPEDA, ensuring the implementation of the within policy and responding to any requests by members concerning the privacy, collection, use or disclosure of their personal information.

**(9) Enquiries and Complaints**

Concerns regarding the RNANT/ NU compliance to the privacy policies may be brought forth to the RNANT/NU Privacy Officer. Upon receiving an inquiry or complaint, the Privacy Officer shall conduct an investigation and provide the complainant with information about other avenues of complaint including the Office of the Privacy Commissioner of Canada.

**(10) Internet Access**

The RNANT/ NU website provides internet links to various websites operated by other regulatory organizations, government agencies, private businesses and associations. Once you have been linked to these other sites, the RNANT/NU privacy policy is *no longer* active. The site's privacy policy would then be based on the new site accessed. The RNANT/NU is not responsible for the actions or content of outside websites.

**Conditions and Exceptions:**

**(1) Public Register**

RNANT/NU is obligated to provide information upon public inquiries about the registration status of nurses within the Northwest Territories and Nunavut per section 20 of the *Nursing Profession Act* (2003) and Bylaw 23: Public Register.

**(2) Research**

RNANT/NU occasionally participates in nursing research that meets policy guidelines. When



surveys are required:

- for paper versions, the RNANT/NU will label and mail the materials from our office, on behalf of the surveyors, but will not provide member information to the researchers. Members are then free to participate or not as they choose.
- for electronic surveys, the RNANT/NU will send an email with a survey link to members who have consented to receive electronic messages or post a link to the survey on the RNANT/NU website.

### (3) Release of Information for other purposes

With the explicit consent of the member only, RNANT/NU may release information to third parties that participate in research relevant to nurses, provide information on career opportunities, information on services or products, and advisories applicable to the nursing profession, or to receive information and be contacted by a specialty practice group.

#### **Authority and Accountability:**

This policy is issued under the authority of the RNANT/NU Board of Directors and as governed by the *Nursing Profession Act* (2003). The Board of Directors further has the authority to revise this policy as required.

The Executive Director is accountable to the Board of Directors, and ultimately to the membership, for the implementation of this policy and may delegate any related administrative tasks.

#### **History:**

This policy replaces AG8: Privacy that came into effect in 2004.