



NEWFOUNDLAND AND LABRADOR PHARMACY BOARD

Policy

Collection, Use and Disclosure of Pharmacists' Personal Information

Approved May 29, 2004

The Newfoundland and Labrador Pharmacy Board (NLPB) recognizes its responsibilities for protecting the privacy of pharmacists' personal information. Consequently we have developed policies and procedures to ensure our compliance with the *Personal Information Protection and Electronic Documents Act*. Board employees are subject to policies and procedures that require the safeguarding and proper use of pharmacists' personal information.

Personal Information is information about an identifiable individual or information that can be readily processed to produce information about an identifiable individual. Aggregate information, which cannot be used to produce information about identifiable individuals, is not considered personal information.

COLLECTION OF PERSONAL INFORMATION

The NLPB may collect the following information required about a pharmacist, either directly from the pharmacist or indirectly from other Licensing Bodies:

Demographic Information

Name, date of birth, home address, home telephone number, home fax number, e-mail address, gender, place of birth

Education Information

Educational certificate(s) or university degree(s), Institution from which certificate(s) or degree(s) was granted, date of graduation, Pharmacy Examination Board of Canada registration number, and any other educational certification with respect to the pharmacy profession

Registration Status

Registration Category, Conditions on practice, competency information, complaint or discipline information, current or past registration with other jurisdiction or other Licensing Bodies

Practice Information

Place of practice, address of employer, telephone, fax number and e-mail address of employer

Professional Competency

Continuing Education programs completed, professional development activities and Continuing Competency Assessment programs participated in

USE OF PERSONAL INFORMATION

The NLPB may use information about pharmacists for the purpose of registering that individual, and to continue registering them in a Practicing or Non-Practicing status, and to maintain registers and records required to be kept by the NLPB.

NLPB may use registration information for conducting business that it is mandated to perform under provincial and federal legislation.

DISCLOSURE OF PERSONAL INFORMATION

The *Pharmacy Act* requires the Secretary-Registrar to comply with a request for verification of information contained in a register established under the Act. Registration information (a pharmacist's registration status and location of practice) is not considered personal and confidential information. Consent is not required from the pharmacist for disclosure of such registration information. Examples of such disclosure would include:

- a) Confirmation of registration to other Licensing Bodies
- b) Confirmation of registration to Third Party Payers
- c) Confirmation of registration to drug distributors (wholesalers and manufacturers)
- d) Confirmation of registration to any member of the public or press
- e) Confirmation of discipline procedures according to legislation in place at the time.
- f) Any other purpose mandated by legislation or regulatory necessity

The NLPB will not disclose registration lists or personal information of pharmacists for commercial purposes.

CONSENT

Pharmacist's consent is not required for the collection, use or disclosure of personal information that NLPB is required by legislation or regulation to collect or disclose.

A pharmacist's home address, home phone number, home fax number, or personal e-mail address are examples of personal information which the NLPB will not disclose without the pharmacist's consent.

With a pharmacist's consent, the NLPB may disclose personal information about that pharmacist for the following purposes:

- a) Pharmacist professional development and education
- b) Practice based information or research
- c) Health promotion programs
- d) Health Canada Notices
- e) Pharmacist workforce planning and management

A pharmacist may at any time withdraw consent to the disclosure of their personal information by giving notice in writing to the NLPB. Such withdrawal of consent cannot be retroactive.

The absence of signed consent in the CONSENT AGREEMENT section below will be interpreted by the NLPB as a refusal of consent, or a withdrawal of previously given consent.

OPENNESS AND ACCESS

The NLPB will provide information about the policies, procedures and practices related to its management of personal information about pharmacists. A pharmacist can access any personal information on file about himself or herself.

ACCURACY AND INTEGRITY

The NLPB will take all reasonable steps to ensure that information on file is accurate, complete and up to date as is necessary for the purpose for which it is to be used.

A pharmacist has the right to question the accuracy of information on file concerning him or herself, and to request correction to be made to such information.

SECURITY

The NLPB will protect pharmacist's personal information against accidental or malicious disclosure, modification, removal or destruction.

CHALLENGING COMPLIANCE

A pharmacist has the right to challenge the NLPB's compliance with these policies by making a complaint to the Secretary-Registrar. Complaints that are not handled to the pharmacist's satisfaction may be appealed to the Board.