

### Background

The Health Sciences Placement Network (HSPnet) is a secure web-based system used by provinces across Canada. The HSPnet system contains information about students in clinical placements within health agencies and other placement sites. 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 ([www.hspcanada.net](http://www.hspcanada.net)) relating to the protection of student information in HSPnet.

### Collection, Use, and Disclosure of Personal Information and Personal Health Information in HSPnet

HSPnet policies ensure that Personal Information and Personal Health Information in HSPnet:

- Are collected, stored, 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 Personal Information or Personal Health Information is to be collected; and
- Are used by or disclosed on need-to-know basis only, and accessed by those involved in student placements from an educational program or placement site.
- Personal Health Information is not disclosed to users outside of the student's educational program except where there is a statutory obligation (required by law) to collect and disclose the information (e.g., disease notification requirements or a Public Health Order), or where the student accesses HSPnet to share their information with the placement site.

<b>Personal Information Collected</b> <i>May include any or all of:</i>	<b>Uses of Personal Information</b> <i>BY authorized users in the student's educational program</i>	<b>Disclosure of Personal Information</b> <i>TO authorized users at the placement site</i>
<ul style="list-style-type: none"> <li>• Student name</li> <li>• Student home address, phone numbers, email addresses</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</li> <li>• Student certification ID with registering body for their discipline (e.g. RN Association, College of Physicians and Surgeons)</li> <li>• Date of Birth: DD/MM (excludes year)</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><b>Student name</b> is disclosed after a placement is accepted by the site and confirmed by the educational program, to facilitate arrangements (such as orientation and preceptor assignment) and as a record of placements. Name may be disclosed prior to acceptance if the site has a reasonable justification (e.g. to arrange a student interview).</p> <p><b>Student email address</b> (issued by the educational program) may be released to support administration of computer access at the site.</p> <p><b>Student certification ID</b> may be released to sites if needed to coordinate placement arrangements such as computer access.</p> <p><b>Student gender</b> may be disclosed in the following limited situations:</p> <ul style="list-style-type: none"> <li>• For allocation of change rooms and lockers at the site</li> <li>• For matching the gender of the student and supervisor (e.g. for homecare visits where the client <b>may</b> specify a preference)</li> </ul> <p><b>Date of Birth (DD/MM)</b> may be released to sites if needed to coordinate placement arrangements such as computer access.</p>

Information on a student's prerequisite status 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.	Details not disclosed except: 1. Where there is a statutory obligation. 2. Where the student accesses HSPnet and shares their information with the placement site. Access to the information is limited to a certain date chosen by the student or until consent expiry.
Student profile of educational or work history relevant to placement requests	To facilitate a good fit between the student and the placement Site, learning experiences offered, and supervisor/preceptor to be assigned.	
<b>Personal Health Information Collected</b> <i>May include any or all of:</i>	<b>Uses of Personal Health Information</b> <i>BY authorized users in the student's educational program</i>	<b>Disclosure of Personal Health Information</b> <i>TO authorized users at the placement site</i>
Status of compliance with site requirements for safety and/or infection control: <ul style="list-style-type: none"> <li>Information on a student's immunity or immunization status for vaccine-preventable diseases such as Varicella, 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 placement sites.	Details not disclosed except: 1. Where there is a statutory obligation. 2. Where the student accesses HSPnet and shares their information with the placement site. Access to the information is limited to a certain date chosen by the student or until consent expiry.

## 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 reviews of data quality to identify the need for interventions such as user training or 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 until the student's completion of or withdrawal from the educational program as recorded on their HSPnet profile, or after the consent expiry period of six years, whichever occurs first. A copy of their Personal Information is available to a student upon request to their jurisdiction's Privacy Officer or the national HSPnet Privacy Officer.

## Openness, Access, and Challenging Compliance

- An individual can access their own information as well as a complete description of the type of Personal Information or Personal Health Information used/disclosed and the purposes for using or disclosing the information. Such requests can be made in writing by the student to the national 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 <https://hspcanada.net/privacy-officers/>).
- An individual may request changes to their Personal Information or Personal Health Information 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 national HSPnet Privacy Officer or local Privacy Officer within their jurisdiction.