



Health Sciences Placement Network
Réseau de gestion des stages en sciences de la santé

National HSP*net* Policies

Approved by the

National HSPnet Alliance Steering Committee

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Preamble

HSPnet is an initiative of the BC Academic Health Council (BCAHC), a not-for-profit organization that developed HSPnet for use in BC and subsequently established the National HSPnet Alliance to allow other provinces to access the system. Through the Alliance, a Lead Agency in each province or jurisdiction enters into an agreement with the BCAHC to license HSPnet on behalf of user agencies (sub-licensees) within the Lead Agency's province or jurisdiction.

The shared infrastructure of the National HSPnet Alliance (encompassing system/network management, user training and support, documentation, enhancements, evaluation, and policy) is governed by the National HSPnet Steering Committee. This Committee is responsible for ensuring the success of the shared infrastructure through financial sustainability and achievement of mutual goals.

The National HSPnet Policies were developed to govern the use of HSPnet by licensee and sub-licensee organizations, to ensure:

- Compliance with provincial and federal legislation on privacy and security of personal information;
- Consistency of policy and procedures across user organizations and Lead Agencies; and
- Effectiveness of infrastructure operations.

TABLE OF CONTENTS

Section 1: Eligibility for HSPnet Access

Policy No. 1.0: HSPnet Access - General

Section 2: HSPnet Funding & Sustainability

Policy No. 2.1: Cost Recoveries and Subscription Fees

Section 3: Privacy, Security and Data Access

Policy No. 3.0: Privacy and Security - General

Policy No. 3.1: Accountability

Policy No. 3.2: Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure of Personal Information

Policy No. 3.3: Accuracy of HSPnet Data

Policy No. 3.4: Safeguards for HSPnet Data

Policy No. 3.5: Openness, Individual Access and Challenging Compliance of HSPnet Data

Policy No. 3.6: Access to HSPnet Data

Section 4: HSPnet Governance and Management

Section 5: HSPnet Systems Development

Section 6: Training and Support

Policy No. 6.1: HSPnet Training

Section 7: Language Duality

Policy No. 7.0: General

National HSP_{net} Policies

Record of changes to Policies and Procedures:

Date	Policy	Description of Change
March 30, 2009	2.1	Replaced reference to “Partnership” with “Alliance”
March 30, 2009	3.0	Replaced 2 references to “Partners” with “Alliance members” and “Alliance”
March 30, 2009	3.2	Policy 1.b – added policy to allow Destinations to request release of Student gender on a need-to-know basis Procedures (e), (f) and (g) – added procedures to support release of Student gender
March 30, 2009	3.4	Procedure (h) – added requirement for Local Administrators to ensure that a dedicated, and not shared, email address is entered for each user account,
September 30, 2009	3.2	Procedure (f) – added requirement for organizational policy to support request for student gender; added limitation for only Receiving Coordinators to modify this field.

Section 1: Eligibility for HSP_{net} Access

Policy No. 1.0: HSP_{net} Access - General

Purpose

To ensure that HSP_{net} access is made available to all Agencies that could benefit from its use while contributing to the system-wide benefits for all HSP_{net} users.

Principle

Once admitted to a health professional education program, students deserve a quality learning experience (from “BCAHC Post-Summit Action for Student Placements – January 14, 2005”)

Policy

1. The BCAHC will maintain a definition of eligibility for HSP_{net} access that will maximize the system-wide benefits for all Participating Agencies.
2. All agencies that use HSP_{net} will agree to comply with the National HSP_{net} Policies.

Definitions

Eligible Agency – An Agency is eligible for access, via an authorized User ID, to a provincial instance of HSP_{net} (HSP_{net}-XX) if the Agency:

- Registers students in health sciences educational programs and places those students in clinical practica or fieldwork opportunities within that province; OR
- Acts as a Receiving site in that province for students registered in health sciences educational programs by accepting those students into clinical practica or fieldwork opportunities.

Procedures

- a. The HSP_{net} Steering Committee will review the above definition of an Eligible Agency on an annual basis.
- b. The BCAHC will ensure that all Lead Agencies joining the national HSP_{net} Alliance include a requirement by sub-licensee agencies to comply with the National HSP_{net} Policies.

Section 2: HSPnet Funding & Sustainability

Policy No. 2.1: Cost Recoveries and Subscription Fees

Purpose

To facilitate (optional) processes in each province that enable user agencies to contribute to the ongoing costs of HSPnet implementation, operations and enhancement.

Principle

Agencies that use HSPnet may contribute towards the costs of operating and enhancing the system.

Policy

1. Each province or jurisdiction represented in the HSPnet Alliance may choose to develop one or more mechanisms to recover ongoing costs of HSPnet operation and enhancement from Agencies that use HSPnet in that province.
2. If a jurisdiction's cost recovering mechanisms include a subscription fee for some or all members, then that province may adopt the following Procedures to manage the subscription application and renewal process.

Definitions

User Agency – An Agency eligible for access under Policy 1.0, to use HSPnet.

Subscriber Agency – A User Agency that holds a subscription under this Policy to use HSPnet.

Procedures

- a. User Agencies wishing to access HSPnet on a subscription basis (Subscriber Agencies) will contribute to their jurisdiction's one-time implementation costs, ongoing support, and access to HSPnet fixes and enhancements through payment of an annual subscription fee, to be payable in each HSPnet budget year (April 1 to March 31).
- b. Any jurisdiction wishing to collect Subscription Fees will:
 - Require their HSPnet-XX Coordinator to develop and maintain a process for Subscription applications and renewals;
 - Require the HSPnet-XX Management Committee to develop a Subscription Fee Schedule for their jurisdiction, and to review and update that Schedule on an annual basis.
- c. The HSPnet-XX Coordinator will provide new Subscriber Agencies in their jurisdiction with an HSPnet Subscription Application/Renewal Form, based on information about the Subscriber Agency's educational programs, intakes (cohorts), and student enrolment.
- d. Subscriber Agencies will return their signed Subscription Application/Renewal Forms to the HSPnet-XX Coordinator, who will then invoice the Subscriber Agency for the coming year and follow up regarding payment to the jurisdiction. The invoice amount may be pro-rated for partial year access.
- e. The HSPnet-XX Coordinator will forward a copy of the signed Subscription Application/Renewal Form to the HSPnet Director, who will then schedule implementation training for the new Subscriber Agency. On mutual agreement, the HSPnet Director, Subscriber Agency, and HSPnet Subscription Coordinator may agree to schedule implementation training prior to receipt of the subscription payment so long as the Subscription Application/Renewal Form has been signed and returned.

- f. The HSPnet Subscription Coordinator will establish an escalation procedure for following up on delinquent payments from Subscriber Agencies (new applicants or renewals), up to and including advising the HSPnet Director to de-activate all user ID's in a Subscriber Agency that has not paid the current year's subscription fees.

Related Documents

- *HSPnet Subscription Application / Renewal form*

Section 3: Privacy, Security and Data Access

Policy No. 3.0: Privacy and Security - General

Purpose

To ensure the protection of personal information in HSPnet under the management of the BCAHC.

Principles

The BCAHC and HSPnet Alliance members endorse the 10 Principles of the Canadian Standards Association (CSA) Model Code, now included in the federal *Personal Information Protection and Electronic Documents Act*. These principles are recognized as the foundation for privacy protection legislation and are reflected in BC's *Freedom of Information and Protection of Privacy Act* and in other provincial legislation. The 10 principles that underlie the HSPnet privacy and security program are:

- **Accountability** - An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.
- **Identifying purposes** - The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.
- **Consent** - The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.
- **Limiting Collection** - The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.
- **Limiting Use Disclosure and Retention** - Personal information shall 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 shall be retained only as long as necessary for the fulfillment of those purposes.
- **Accuracy** - Personal information shall be as accurate, complete and up-to-date as is necessary for the purpose for which it is used.
- **Safeguards** - Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
- **Openness** - An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.
- **Individual Access** - Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information, and shall be given access to that information.
- **Challenging Compliance** - An individual shall be able to address a challenge concerning compliance with the above principles to the designate individual or individuals accountable for the organization's compliance.

Policy

1. The BCAHC CEO will ensure that a comprehensive privacy and security program is maintained for HSPnet, in order to meet the requirements of provincial and federal legislation in each province where HSPnet is used.

2. As a best practice, each Alliance jurisdiction will conduct a Privacy Impact Assessment (PIA) to ensure HSPnet meets or exceeds the legislated privacy requirements of the jurisdiction's province(s). The completed PIA will be submitted by the jurisdiction's Lead Agency on behalf of participating agencies, in the format required for the jurisdiction's province(s) if specified, to the required privacy office(s) if specified or on a voluntary basis to one or more privacy offices as recommended by the Lead Agency. Completed PIAs will be posted on the HSPnet website for each jurisdiction.

Section 3: Privacy, Security and Data Access

Policy No. 3.1: Accountability

Purpose

To establish accountability for personal information in HSPnet under the management of the BCAHC.

Principles (based on the 10 Principles of the CSA Model Code)

- Accountability is organizational in focus and will apply to all systems and programs and all data for which BCAHC acts as a steward.
- The BCAHC is responsible for personal information under its control and shall designate an individual or individuals who are accountable for compliance with legislation and professional standards governing the protection of personal information.

Policy

1. The HSPnet Steering Committee will be responsible to the organizations represented by its members for the development and effectiveness of National HSPnet Policies, including policies to support the privacy and security of personal information in HSPnet.
2. The BCAHC CEO is accountable to the National Steering Committee and provincial Lead Agencies for the conduct of HSPnet Service Providers, including compliance with the National HSPnet Policies.
3. The BCAHC CEO will ensure that all of its staff and contractors who have access to HSPnet data are guided by clear rules of conduct and confidentiality.
4. Provincial Lead Agencies are responsible for compliance with the National HSPnet Policies by user agencies within their jurisdiction.
5. The BCAHC Executive will ensure that that policies relating to privacy and security of personal information in HSPnet are maintained in the event that the BCAHC transfers management of HSPnet to an external organization on either a temporary basis (e.g. outsourcing contract) or permanent basis (legal transfer).

Definitions

Data Steward – an individual or body responsible for managing and protecting data on behalf of others. Stewardship encompasses responsibilities for development and oversight of policies and processes for data creation or acquisition, sharing and access, reliability, security, and disposition.

Service Provider – an employee or contractor in physical or logical possession of information that is protected by a Data Steward. Typically, Service Providers provide day-to-day management of the databases, applications, and/or hardware that support the collection, use and disclosure of information. Given their potential access to personal information, Service Providers should operate under clear rules of conduct and confidentiality.

Procedures

- a. The HSPnet Steering Committee will ensure that each province using HSPnet establishes an ongoing HSPnet-XX Data Stewardship Committee, accountable to the HSPnet Steering Committee and to agencies using HSPnet-XX (“Participating Agencies”) in their province.

National HSPnet Policies

- b. The HSPnet-XX Data Stewardship Committee in each province will conduct an annual review to assess the effectiveness of its role as Data Steward, and will report the results of this review to the HSPnet Steering Committee. The review will include a process to facilitate input from HSPnet-XX users into the development, application, and ongoing review of the National HSPnet Policies Privacy, Security & Data Access.
- c. The BCAHC CEO will ensure that all new BCAHC staff and contractors with access to personal information in HSPnet receive appropriate training and sign a document entitled *Agreement on Confidentiality and Rules of Conduct for HSPnet Service Providers* prior to gaining access to HSPnet. The signed document will be maintained on file at the BCHAC offices.
- d. The BCAHC CEO will appoint a Privacy Officer to be responsible for overseeing processes to protect personal information in HSPnet, and to act as a resource to the Privacy Officer in each jurisdiction.
 - The Privacy Officer will develop, maintain, and coordinate application of the National HSPnet Policies in each province.
 - The Privacy Officer will ensure that each province using HSPnet publishes the contact information of the BCAHC Privacy Officer and the HSPnet-XX Privacy Officer (title and office phone, email and mailing addresses) on the HSPnet-XX website and in publications relating to the collection, use or disclosure of personal information in HSPnet.
 - The Privacy Officer will train BCAHC staff and contractors involved with HSPnet on the National HSPnet Policies.
- e. The Lead Agency in each jurisdiction will appoint a Privacy Officer to be responsible for overseeing processes to protect personal information in their jurisdiction.

Related Documents

- *Role Description – BCAHC Privacy Officer*
- *Terms of Reference – Data Stewardship Committee*
- *Agreement on Confidentiality and Rules of Conduct for HSPnet Service Providers*

Section 3: Privacy, Security and Data Access

Policy No. 3.2: Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure of Personal Information

Background

Students may choose to authorize their educational institution to use and/or disclose their personal information via HSPnet for the purpose of locating and coordinating student placements within participating agencies.

Purpose

To identify the purposes of personal information in HSPnet and to ensure that informed consent is obtained prior to collecting personal information for the identified purposes.

Principles (based on the 10 Principles of the CSA Model Code)

- The purposes for which personal information is collected shall be identified by an organization at or before the time the information is collected.
- The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information.
- The collection of personal information shall be limited to that which is necessary for the purposes identified by an organization. Information shall be collected by fair and lawful means.
- Personal information shall 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 shall be retained only as long as necessary for the fulfillment of those purposes.

Definitions

Students – An individual registered in an educational program. A student's name, contact information and practice education profile are considered to be **Personal Information**.

Staff – An individual employed or contracted by an educational institution or receiving site that is involved in practice education activities. Staff name, business contact information, and practice education profile are considered to be the **Business Information** of the employing/contracting organization and are not considered to be personal information.

Policies

1. Personal information will be collected, used and disclosed via HSPnet on a need-to-know basis only and for purposes consistent with identifying and coordinating appropriate placements for students (the identified purposes for collecting data via HSPnet, or "Identified Purposes"). In general, "need-to-know" will commence after the placement is confirmed, in order to initiate communications with the student and to coordinate their placement.
 - a. Student identity may be released prior to confirming a placement in situations where communications must start before the placement can be accepted (i.e. for a placement interview) or when considering where a student should be placed (i.e. if the student is employed by the placing site).
 - b. Student gender may be entered into HSPnet by an educational program *if placements are made in Destinations that respect patient/client preference for the gender of their provider (e.g. homecare visits) and therefore require the Program to disclose Student gender so they*

can assign students. Student gender would be disclosed only to Destinations that specify this requirement in their online Destination Profile.

2. The Identified Purposes will be explained to students at the time of entering their personal information into HSPnet, or within a reasonable period of time after entry into HSPnet if the entering agency is relying on a previous consent or notification process relating to use/disclosure of their personal information for the purpose of coordinating a placement experience.
3. All personal information to be used or disclosed via HSPnet will be described clearly by the Identified Purposes and the amount and type of information, and length of time that the personal information is retained, will be limited to that required to meet the Identified Purposes.
4. Personal information will be obtained directly from the student or from information provided with the student's consent and for the Identified Purposes, and will not be used or disclosed after fulfillment of the Identified Purposes.
5. Informed consent, based on receipt and acknowledgement of the Identified Purposes, will be obtained from a student before entering their personal information into HSPnet. During initial implementation of HSPnet, the agency entering the student information may elect to rely on a previous process whereby students have been notified and/or given consent to use/disclose their personal information for the purpose of coordinating a placement experience.
6. Any agency relying on a previous process for notification and/or consent will make reasonable efforts, during the months following HSPnet implementation, to obtain formal consent based on the Identified Purposes and handling of their personal information via HSPnet.
7. A student may withhold consent to collect, use or disclose their personal information via HSPnet, and will be advised of the potential delays or other impacts of withholding that consent.
8. A student may revoke their consent by submitting a written request to their educational program coordinator. Revocation of consent will not be effective for uses or disclosures already made as permitted by the prior consent.
9. A student has the right to request that the use and/or disclosure of their personal information in HSPnet be restricted. Such requests must be made in writing to their educational program coordinator. If restriction of use of their personal information as requested precludes the use of HSPnet, they will be informed of the potential delays or other impacts of requesting that restriction.
10. Informed consent for any new purposes beyond the Identified Purposes will be obtained from a student before collecting their personal information, or prior to using their personal information if the new purpose applies to data already stored within HSPnet.
11. Personal information will be used or disclosed via HSPnet only during the period covered by the student's consent, which will expire automatically upon graduation or after six years (whichever is less), plus 180 days. After that time, personal information will no longer be used or disclosed via HSPnet.
12. Personal information may be stored in HSPnet archives beyond the consent period, in accordance with Data Retention and Archival schedule approved by the HSPnet Steering Committee, for the following specific and limited purposes:
 - Release to a student, upon written request accompanied by proof of identification, of a copy of their own placement history;
 - Compliance with a subpoena or other legally binding access to the information;
 - Quality assurance or research purposes that involve use of de-identifiable data only.

Procedures

- a. The BCAHC will develop and maintain a document entitled *Identified Purposes and Handling of Personal Information in HSPnet*. The document will summarize the amount, type and purposes of personal information to be used or disclosed via HSPnet, and will be provided to all students at the time of obtaining their informed consent and prior to entry of their personal information into HSPnet.
- b. Students providing personal information for use in HSPnet will indicate their informed consent by signing a *Consent Form for Use and Disclosure of Personal Information* ("Consent Form") for each educational program that uses HSPnet, prior to their personal information being entered into HSPnet.
- c. Signed Consent Forms will be maintained on file by the educational program of the Participating Agency that enters the student information into HSPnet for a minimum of seven years or longer if required by the Participating Agency's record retention policies.
- d. HSPnet users will ensure that an up-to-date Consent Form is on file before entering a student's identifiable information into HSPnet. If student information is entered into HSPnet during the implementation period based on a previous consent or notification process, HSPnet users will make reasonable efforts to obtain a signed Consent Form for all students whose personal information is being entered into HSPnet.
- e. Educational Programs will be permitted to enter Student gender in HSPnet only if they setup their Program to use this data field. If gender is entered, it will be disclosed via HSPnet only to Destinations that specify this requirement.
- f. Receiving Destinations that require Student gender in order to assign students based on patient/client preference must specify this requirement in their online Destination Profile. This requirement should be based in organizational policy as appropriate, and can be entered into HSPnet only by a user with the role of Receiving Coordinator (Local Administrator access level) on behalf of the Destination Coordinator.
- g. On an annual basis, the HSPnet Director will report to the jurisdiction's Data Stewardship Committee on the name and discipline of all educational Programs setup to use/disclose Student gender, and the Agency/Site/Service of all Destinations specifying a requirement for disclosure of Student gender.
- h. HSPnet users will only enter identifiable student information into the fields specified for this purpose (student last name, student first name) and will not enter names or other information that may identify a student into fields designated for Comments, Alerts, or other purposes.
- i. If a student's identifiable information contained in HSPnet is to be used for any new or previously unidentified purpose, including but not limited to research or quality assurance activities, the student(s) affected will be contacted by a representative of their educational program for the purpose of updating their informed consent to include the new or previously unidentified purposes.

Related Documents

- *Consent Form for Use and Disclosure of Personal Information*
- *Identified Purposes and Handling of Personal Information in HSPnet*
- BCAHC Policy 3.4: Safeguards

Section 3: Privacy, Security and Data Access

Policy No. 3.3: Accuracy of HSPnet Data

Purpose

To ensure that all reasonable efforts are made to guarantee the accuracy and completion of personal information in HSPnet.

Principle (based on the 10 Principles of the CSA Model Code)

- Personal information shall be as accurate, complete and up-to-date as is necessary for the purpose for which it is used.

Policies

1. Participating Agencies will ensure that students have mechanisms to notify their educational institution of changes to their personal information.
2. The BCAHC and Participating Agencies will make reasonable efforts to ensure that personal information provided by a student is entered into HSPnet without errors or omissions.

Procedures

- a. The BCAHC will build, test and implement mechanisms in HSPnet that facilitate the accurate entry of information by including tools such as:
 - Mandatory fields
 - Data entry confirmation prompts
 - Duplicate entry
 - Formatting rules
- b. The HSPnet Director will monitor reported problems relating to data and accuracy completeness and will alert the HSPnet Steering Committee as to the nature and cause of the data quality issue plus recommendations or actions taken. Such actions may include training, user communications, and improvement of HSPnet functionality.
- c. User Agencies may contact the HSPnet Director to arrange for a direct upload of student or staff data from their school information system or other databases into the HSPnet database. The HSPnet Director will provide detailed instructions and data specifications to guide uploads from external data sources, and will ensure that the data to be uploaded is consistent with the purposes for collecting student information as defined by the Identified Purposes.
- d. User Agencies will be responsible for ensuring the accuracy of information uploaded into HSPnet.
- e. The HSPnet Director will ensure that data uploads into HSPnet are checked for generic data errors, such as extra spaces or punctuation, that would impact data quality in HSPnet.

Related Documents

- *HSPnet User Guide* (available at <http://hspscanada.net/resources/guide.html>)

Section 3: Privacy, Security and Data Access

Policy No. 3.4: Safeguards for HSPnet Data

Purpose

To ensure personal information is protected by appropriate security safeguards.

Principles (based on the 10 Principles of the CSA Model Code)

- Safeguards are necessary to protect the data's confidentiality, integrity and availability.
- Safeguards must include: 1) preventive, 2) detective, and 3) corrective controls.
- Effective controls consist of four elements: 1) the control itself, 2) an agreement to employ the control, 3) a compliance mechanism to ensure that the agreement is being upheld, i.e., that the control is being used effectively, and 4) consequences for breach of the agreement.
- Security controls apply to all individuals - staff, students, contractors, affiliates and partners. Security controls must be applied to all elements of information management: information, infrastructure, applications, and business process and should include physical measures, organizational measures and technological measures.
- Access control is required to prevent unauthorized persons from accessing data and to prevent authorized persons from accessing data for unauthorized purposes. Data accessed for an authorized purpose must not be used for an additional purpose.

Policies

1. The BCAHC will follow industry standards and/or best practices on safeguards to protect the confidentiality, integrity and availability of data in HSPnet.
2. The BCAHC will enforce compliance with standards wherever possible through automated tools and scheduled activities that detect possible problems with safeguards and facilitate development and introduction of remedies.
3. The BCAHC will incorporate initial and ongoing education about National HSPnet Policies into all training materials and processes, and into regular user communications.

Procedures

- a. The BCAHC will maintain a comprehensive Service Level Agreement (SLA) to ensure its server host provider follows industry standards and/or best practices to safeguard the physical security of the server and network. These standards will include provisions for protection from viruses and other threats, firewall management, data encryption, and reporting of security breaches or data loss to the HSPnet Director by the end of the work day during which the breach or loss occurred.
- b. The BCAHC Privacy officer will monitor the activities of the server host and network provider and take immediate corrective actions if the minimum standards of the SLA are not met.
- c. The HSPnet Director will report any security breaches or data loss by the end of the work day during which the breach or loss occurred, to the BCAHC CEO, HSPnet Coordinator and/or Lead Agency representative of the affected jurisdiction, and HSPnet Steering Committee members.

National HSPnet Policies

- d. The BCAHC will issue a User ID with Local Administrator rights to one or more authorized individuals within each Participating Agency, and will provide Local Administrators with comprehensive training and documented instructions on their responsibilities as Local Administrator.
- e. Local Administrators will be responsible for creating, managing, and deleting User ID's for authorized individuals within their organization. They will not be permitted to create additional User ID's with Local Administrator rights.
- f. Local Administrators will grant or modify access rights for a user as appropriate for that individual's organizational responsibility for placing students as defined by the Identified Purposes. Local Administrators will grant access on a need-to-know basis only, and will limit each user's access to placement information that is within their organizational responsibility.
- g. The BCAHC will ensure that HSPnet tools for managing user access provide adequate granularity and specificity to allow users to perform their work while protecting personal information from intended or inadvertent browsing or tampering.
- h. Local Administrators will assign a unique User ID to each individual user; there will be no shared User ID's among HSPnet users. Local Administrators will ensure that each user has a dedicated (not shared) email address entered into HSPnet for the purpose of communication with other HSPnet users and for receipt of system messages from HSPnet.
- i. HSPnet users will notify their Local Administrator of any changes to their organizational role that may impact their need for access to identifiable student information in general or for a specific educational program, discipline, or receiving destination. For example, if a user is no longer responsible for a unit or program area, the Local Administrator will be notified to remove that unit or program area from the user's access.
- j. The HSPnet application will automatically forward a random, confidential, complex password to the user's email account upon creation of a new User ID. New users will be required to select a new password upon login for the first time. Passwords will be of a format complex enough to prevent guessing or other routine efforts to use another individual's User ID. The password format and rules will be reviewed annually against industry standards by the HSPnet Steering Committee.
- k. The HSPnet application will automatically require users to change their password according to a set schedule to be determined and reviewed annually by the HSPnet Steering Committee.
- l. The HSPnet Steering Committee will review results of periodic audits of HSPnet transactions, in an effort to detect and remedy inappropriate access and/or gaps in the user interface that might permit inappropriate access to data.
- m. The HSPnet Steering Committee will review results of periodic audits of data entered into HSPnet fields, in order to detect intentional or unintentional release of private information that is not otherwise authorized. For example, the HSPnet Director will run regular audits on a random sample of Comments fields to ensure that no student identifiers have been entered.
- n. The HSPnet Director will address any breaches of this Policy by:
 - On a first offence, alert the offending user as to their Policy breach, direct them to this Policy regarding next steps upon escalation, and audit 100% of transactions for that agency for six months;
 - On a second offence of one or any users in a single agency, alert the Dean/Director or Department Head for the user(s), direct them to this Policy regarding further escalation, and audit 100% of transactions for that agency for six months;

National HSPnet Policies

- On a third offence of one or any users in a single agency, alert the BCAHC CEO for action up to and including disabling the access rights of the offending user(s)' and/or all users' access rights; if access is permitted to continue, audit 100% of transactions for that agency for six months.
- o. The HSPnet application will automatically time-out if left inactive for a set period of time. The time-out period will be reviewed annually by the HSPnet Steering Committee.
- p. The HSPnet Director will run quarterly reports of unused User ID's and will inactivate users ID's that have been inactive for six months. The HSPnet Director will advise Local Administrators of user ID's that have been inactivated.
- q. The HSPnet Director will ensure that a system for records retention, disposal and archival is maintained, with processes and timelines consistent with the *Identified Purposes* handout and consistent with the Student Consent form. The processes and timelines will be reviewed annually by the HSPnet Steering Committee.

Related Documents

- *HSPnet User Guide* (available at <http://hspscanada.net/resources/guide.html>)

Section 3: Privacy, Security and Data Access

Policy No. 3.5: Openness, Individual Access and Challenging Compliance of HSPnet Data

Purpose

To ensure openness and accessibility for students whose personal information is contained in HSPnet.

Principles (based on the 10 Principles of the CSA Model Code)

- An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.
- Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information, and shall be given access to that information.
- An individual shall be able to address a challenge concerning compliance with the above principles to the designate individual or individuals accountable for the organization's compliance. Safeguards must include: 1) preventive, 2) detective, and 3) corrective controls.

Policies

1. National HSPnet Policies will be made available and open with respect to management of personal information. These policies will describe the mechanism whereby a student can access their own information as well as a complete description of the type of personal information collected and the Identified Purposes for the information.
2. The BCAHC will provide the opportunity for students to access data collected in their name. Only the student or their designated representative has a right to access such personal information and no student will be entitled to personal information on another individual.

Procedures

- a. National HSPnet Policies will be made available on the HSPnet website at www.hspcanada.net, or upon request by a student to the BCAHC Privacy Officer.
- b. A student can request a copy of their personal information in HSPnet by presenting a written request to the HSPnet Privacy Officer or his/her designate along with two pieces of identification, one of which must be their current student identification card with student number and photograph. The Privacy Officer will provide the student, within two weeks of the request, a list of specific information contained in HSPnet and, if requested, a list of uses/disclosure of that information plus an explanation of the list provided.
- c. Any decision to refuse all or part of a student's request for access to information will be relayed in writing to the requestor and will include (1) the specific provision for refusal under the jurisdiction's legislation and (2) clear reasons for the refusal.
- d. A student may request changes to their personal information contained in HSPnet by submitting a request in writing to the placement coordinator of their educational program. If the request cannot be accommodated, the educational program will provide a written explanation of the reasons that their request cannot be granted and a notation will be made on the student's record that their request for a change was refused.

National HSP_{net} Policies

- e. A student may register a complaint or challenge regarding the handling of personal information in HSPnet in writing to the BCAHC Privacy Officer, who will investigate the complaint/challenge through the involved Participating Agencies.
- f. The Privacy Officer and Participating Agencies will take appropriate measures, including as necessary the adjustment of National HSPnet Policies. The Privacy Officer will relay the measures taken or proposed, back to the student within one month of their original complaint or challenge.

Related Documents

- *Identified Purposes and Handling of Personal Information in HSPnet*
- *Policy 3.1 - Accountability*
- *Role Description – BCAHC Privacy Officer*

Section 3: Privacy, Security and Data Access

Policy No. 3.6: Access to HSP_{net} Data

Purpose

To ensure appropriate access to HSP_{net} data by HSP_{net} users and external requesters.

Principles (based on the 10 Principles of the CSA Model Code)

- An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the CSA Model Code principles.

Definitions

HSP_{net} user – An individual with an active HSP_{net} user ID who may access data as determined by his Access Rights (set by a Local Administrator) and as appropriate for his organizational role.

Participating Agency – An agency with one or more staff members who are HSP_{net} users.

External Requester – An individual or agency that makes a request for HSP_{net} data but does not have any HSP_{net} users on staff.

Policies

1. The Data Stewardship Committee for each province will establish a process to guide consideration of requests for access to data at all levels, and will conduct an annual evaluation of the effectiveness of that process.
2. A Data Sharing Agreement between the BCAHC and each Lead Agency, on behalf of user agencies in each jurisdiction, will be established to document the respective rights and responsibilities of parties in contributing, protecting, and enabling access to HSP_{net} data.

Procedures

- a. HSP_{net}-XX Data Stewardship Committees will oversee an Approvals Process for access to HSP_{net} data according to the Data Access Approval Guidelines on the following page.
- b. HSP_{net}-XX Data Stewardship Committees will conduct an annual review of the outcome of requests considered through the Approvals Process, and if necessary advise the HSP_{net} Steering Committee on the need to revise this Policy and/or the Approvals Process.
- c. One or more HSP_{net} users may request a data extract or development of a Custom Report by forwarding a completed Data Access Request Form to the HSP_{net} Director. The Director will review the request against the Data Access Approval guidelines and deliver the completed report if authorized by the guidelines, or will seek approval from that user's HSP_{net}-XX Data Stewardship Committee (or from all committees if the data request crosses provincial boundaries).
- d. If a Custom Report has ongoing value to other HSP_{net} users, the HSP_{net} Director may publish the report as a new pre-defined report to the Reports Menu, in accordance with the Data Access Approval Guidelines.

- e. The Data Sharing Agreement will address situations where two or more educational Programs may operate under a collaboration or affiliation arrangement whereby students transfer from one Placing Agency to another during completion of their Program. The Student Consent form for Students enrolled in such collaborative or “transfer” programs will include reference to a potential need to transfer a copy of their personal information from the “starting” Placing Agency to their “finishing” Placing Agency involved in the collaborative Program.

Related Documents

- *Terms of Reference – HSPnet Data Stewardship Committee*
- *HSPnet Data Sharing Agreement*

Data Access Approval Guidelines

Level of Requester	Type of Request and Example(s)	Approval Process
Non-Identifiable Data (student personal information removed)		
HSPnet users	Placement Data <ul style="list-style-type: none"> List of students on my unit next month Placement hours per student in my allowed educational programs 	Pre-defined reports will be made available within the HSPnet Reports menu, available to authorized HSPnet users as permitted by their Access Rights.
	Cross-Department Data <ul style="list-style-type: none"> Comparison of placement hours across multiple departments or programs not within my access rights 	Data requests to be approved by HSPnet Director if the data requested is within the scope of the requester's role in their agency
User Agencies	Agency-Specific Data <ul style="list-style-type: none"> # of Placements in all departments in my agency 	Data requests to be approved by HSPnet Director if the data requested is within the scope of the requester's role in their agency
	Cross-Agency Data: agency non-specific <ul style="list-style-type: none"> List of all LPN nursing placements in BC 	Data requests to be approved by the HSPnet Director if the data requested is specifically related to the requester's role in their agency and the data will provide information that would otherwise be publicly available
	Cross-Agency Data: agency-specific <ul style="list-style-type: none"> Placements involving multiple schools as members of a committee or collaborative (e.g. Nursing Interschool in BC, Ottawa region's Clinical Resource Committee) Pediatric placements across multiple Placing or Receiving agencies 	Data requests to be approved by: <ul style="list-style-type: none"> the jurisdiction's Data Stewardship Committee; OR the HSPnet Director if all agencies contributing data give permission to generate the combined report on a one-time or ongoing basis
External Organizations	Aggregate Data: Government and Policy organizations may be granted access to aggregate (de-identified) data as available within the Policy Access Level (PAL) module of HSPnet. ¹	PAL user ID's to be approved by the jurisdiction's Data Stewardship Committee
	Non-aggregated Data: Limited to agency program- or site-identified data; no personal identifiers	Data requests to be approved by: <ul style="list-style-type: none"> the jurisdiction's Data Stewardship Committee; OR the HSPnet Director if all agencies contributing data give permission to generate the combined report on a one-time or ongoing basis
Identifiable Data (student personal information included)		
All Requesters	All Requests	Data requests to be approved by the jurisdiction's Data Stewardship Committee

¹ PAL access allows generation of aggregate data on placement activities and related information, based on data for which all personal identifiers (student/staff) and agency identifiers (Placing or Receiving Agency, program, site) have been removed.

Section 4: HSPnet Governance and Management

Under Development:

- Development and Change Control
- Release Management and Control
- HSPnet System Maintenance
- System Performance Standards and Monitoring

Section 5: HSPnet Systems Development

Under Development:

- QM Framework
- QM Standards and Monitoring

Proposed Principles of HSPnet Enhancement (draft)

- Consider both PA and RA and other scenarios - Impacts of enhancements and associated business rules should be considered and mutually agreed upon
- HSPnet functionality should not unproductively duplicate other systems
- Communications and consultation is required before introducing enhancements, new data fields and associated enforcement rules, and reporting on new fields
- Enhancement Definition
 - Differentiate between improvements to existing functions versus expansion of a function , addition of new data fields, addition of rules that enforce use of fields or features, new modules or significant
 - Use existing definitions of enhancement types –Class 1-3; however HSPnet director can recommend minor fixes and streamlining improvements as needed.
- Research and document the one-time and ongoing cost impacts
- Research privacy and legislative considerations where needed
- Request would have to have rationale and self-assessment against principles – expand Enhancement Proposal form to include analysis against these principles once finalized
- Ongoing evaluation of impacts (post-implementation and periodic review) – define evaluation indicators and tools (e.g. surveys)
- Consider non-HSPnet policy issues and requirements, before and after implementation
- Encompass impacts within the overall HSPnet risk management plan – issues of privacy, data quality, system performance, etc.
- Principle of equity – design enhancements to be generic so as to benefit a high number of users and/or multiple disciplines

Section 6: Training and Support

Policy No. 6.1: HSPnet Training

Purpose

To ensure cost-effective access to high quality training for HSPnet users.

Principles

- All users of HSPnet should receive a standardized minimum of training before being granted an HSPnet user ID, including:
 - Privacy and security of personal information (as required to meet local legislative requirements and commitments of the Privacy Impact Assessment in all provinces)
 - HSPnet navigation (characteristics of web-enabled applications, saving changes, etc.)
 - Access to online help and User Support
- HSPnet Training should be designed and delivered to meet the varying needs of different user levels
- HSPnet Training should be delivered by the most cost-effective mechanisms that ensure:
 - User satisfaction and self-assessment of competency to continue independently
 - User proficiency levels that minimize ongoing use of Help Desk
 - Opportunities for user feedback during training, thereby ensuring that HSPnet functionality continues to evolve and meet user needs
- User Agencies are responsible for effective utilization of Training resources through:
 - Timely advance registration and provision of adequate information to setup trainees prior to training;
 - Compliance with policies and procedures regarding attendance and cancellation and completion of pre-training requirements;
 - Trainee compliance with rules of conduct during HSPnet training (respect for fellow trainees, completion of pre-training requirements, etc.)
 - Timely payment of training fees that may be established by the Management Committee for each jurisdiction, such as fees for late cancellation or “extra” training outside of the approved annual budget.

Policy

1. The HSPnet team will maintain a Training Plan that is appropriate for each user level, encompassing:
 - Effective processes including registration mechanisms, trainee communications, and distribution of pre-training instructions and materials.
 - Detailed training curricula (learning objectives, resources, activities)
 - Training materials including course outlines, worksheets, quick reference guides, and handouts
 - e-Learning resources to provide standardized background content, ongoing access to refresher opportunities, and in some cases an alternative to classroom based learning.
2. The HSPnet team will evaluate and report on the effectiveness of Training activities on an annual basis, including (but not limited to) measures of user/trainee satisfaction, user proficiency, ongoing use of Help Desk resources, and User Agency compliance with policies and procedures.

Procedures

- a. The HSPnet Director will ensure that a Training Plan is updated annually and published, along with associated documents and materials, on the public website.
- b. The HSPnet Director will report on an annual evaluation of Training utilization and effectiveness to the National Steering Committee and to each provincial Management Committee.
- c. The HSPnet Director will report annually regarding User Agency compliance with this Policy including attendance rates and late cancellation or no-show rates and associated impacts.
- d. The Management Committee for each jurisdiction will have the option to set an HSPnet-XX Fee Schedule to recover costs for training activities outside of the annual approved budget. Such fees would reflect the fact that the National HSPnet Alliance operates on a cost recovery basis, and fees may therefore be necessary to cover costs such as:
 - “Extra” training for any User Agency wishing to fund additional training due to high staff turnover, customization to support unique organizational processes, etc.;
 - Charges for late cancellation and “no show” registrants (to be defined by HSPnet Director and reviewed annually);
 - Training binders and other materials;
 - Partial or full recovery of training costs to offset the jurisdiction’s annual operating budget.

Related Documents

- *HSPnet-XX Fee Schedule (template)*

Section 7: Language Duality

Policy No. 7.0: General

Purpose

To ensure equitable access to HSPnet functionality and support for users in both official languages of Canada.

Principles

- All users of HSPnet should have access to training and support in the language of their preference (French or English).
- HSPnet should function effectively and at an equivalent level for anglophone, francophone and bilingual users.

Policy

1. The HSPnet team will strive over time to recruit bilingual staff/contractors and to develop bilingualism in all team members.
2. The National HSPnet Alliance will establish an HSPnet Language Duality Subcommittee to advise the Alliance on ongoing practices and needs to ensure that HSPnet meets its language duality commitments.
3. The HSPnet Director will ensure that all formally published documents are made available in both official languages on the public website and for user distribution.
4. Time-limited or project-specific documents (e.g. an enhancement funded and led by one organization or a province) may be published on the public website in the preferred language of the lead jurisdiction if project funding is not available to support translation to both languages during project planning and development stages.

Procedures

- a. The HSPnet Director will ensure that the Training Plan addresses the needs of all HSPnet users in an equitable fashion, including evaluation of training utilization and effectiveness.
- b. The HSPnet Director will implement a Help Desk staffing and development plan to deliver an equitable standard of response to all users in their preferred language.
- c. For project-specific or time-limited documents, the HSPnet Director will publish a summary statement of the project or initiative in both official languages for the benefit of all HSPnet users and interested audiences.
 - Any organization or jurisdiction wishing to ensure that their users can follow and/or participate in a project in their preferred language may volunteer resources (translation services or funding) to facilitate translation of key documents throughout the project. For example, a bilingual member of a project team may offer to translate Meeting Notes and Requirements Specifications into the other language.
 - Upon project completion any documents with ongoing value, including final versions of key project documents and all instructions for implementing and using the new enhancement, would be translated and published in both official languages.