

**ALBERTA COLLEGE OF FAMILY PHYSICIANS  
PRIVACY POLICY AND PROCEDURES**

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## **1.0 Introduction**

The Alberta College of Family Physicians (ACFP) receives, and has access to, information on its members collected by the College of Family Physicians of Canada (CFPC). This information is used to support key business functions and enhance the value of ACFP membership.

The ACFP is committed to protecting the privacy of its members and non-members and the security of their personal information under its control. As part of that commitment, the ACFP has implemented a privacy policy and procedures document.

The policy statements and procedures contained in this document support the overall Privacy Statement (see Section 3.0). As well as protecting employee information and member information, they provide protection of information required to fulfill the mandate of the ACFP.

These policy statements and procedures will require ongoing review so that they reflect the operating realities of the ACFP, while at the same time, continue to support the privacy policy principles. The policy statements and procedures provide the suggested directions and actions to be taken to protect personal information held by the ACFP. The policy statements and procedures provide the guiding framework, but are not to be substituted for good judgment exercised by staff members of the ACFP.

The ACFP collects a variety of personal information that can be organized into the following broad categories:

### **ACFP Employee Information**

The ACFP collects and retains personal information on all employees. Information collected includes personal identifying information (name, address, SIN, salary information, etc.) and other Human Resource information on employees.

### **Member and Non-Member Information**

The ACFP collects only as much personal information as is required to provide its services to members and non-members.

**Note:** While the ACFP has a research arm – the Alberta Family Practice Research Network (AFPRN) – the collection of any patient data for research projects is done by individual family physicians, not by the ACFP.

## 2.0 Definitions

**Access:** The entitlement of an individual to examine or obtain his or her own personal information held by an organization.

**Accountability:** An organization is responsible for personal information under its control and designates individual(s) who are accountable for the organization's compliance with its privacy policies, procedures, and practices.

**Accuracy:** Personal information kept by the organization will be accurate, complete, and up-to-date.

**Challenging Compliance:** An individual has the ability to challenge an organization's compliance with its privacy principles, policies, procedures and practices, and the complaint is directed to the designated individual(s) accountable for the organization's compliance with its privacy policies, procedures, and practices.

**Consent:** An organization will ensure that there is voluntary agreement by an individual, or his or her legally authorized representative, to allow the collection, use, or disclosure of the individual's personal information. The consent may be either express or implied, and should include an explanation as to the implications of withdrawing consent. Express consent is given explicitly and unambiguously, either verbally or in writing. Implied consent is given when the action/inaction of an individual reasonably infers consent.

**Disclosure:** Disclosure occurs when personal information is made available to a person who is not employed by or in the service of the party holding the information.

**Identify the Purpose:** Purposes, which includes why the information is being collected and how it is being used, are identified by the organization at or preferably before the time of collection. The reason for collection is documented.

**Member:** A Member is a member of the College of Family Physicians of Canada (CFPC) as stipulated in the membership categories set forth in the CFPC Bylaws.

**Non Member:** Non Members are other health care providers, medical students, family medicine residents, and licensed physicians in good standing, engaged in the practice of family medicine who are not members of the College of Family Physicians of Canada (CFPC).

**Personal Information:** Personal information is any factual or subjective information, recorded or not, regarding an identifiable individual, but does not include the name, title, business address or business telephone number of an employee of an organization. (Examples of 'personal information' include name, age, identification number, income,

ethnic origin, opinions, evaluations, comments, employee files, credit or loan records, medical records, or the existence of a dispute between parties.)

**Privacy:** Privacy is the fundamental right of an individual to have their personal information protected.

**Privacy Officer:** The Privacy Officer oversees all the activities related to the development, implementation, maintenance, and adherence to the organization's privacy policies and procedures.

**Retention Schedule:** A retention schedule identifies the period of time personal information is held. Personal information should not be held for longer than is necessary to fulfill the purposes for which it was collected.

**Safeguards:** Safeguards are the actions taken to protect personal information. The level of the action is appropriate to the level of sensitivity of the information.

**Security:** Personal information is protected from unauthorized or unintentional loss, theft, access, use, modification, or disclosure.

**Use:** Use refers to the treatment and handling of personal information within an organization.

### **3.0 Privacy Policy Framework**

Information held by the Alberta College of Family Physicians (ACFP) about its members is collected, stored, used, and disclosed in accordance with the privacy principles established by the Canadian Standards Association (CSA). The ACFP respects members' right to privacy, and is committed to upholding the CSA privacy principles. By developing this policy framework, the ACFP is in compliance with the federal legislation Personal Information Protection and Electronic Documents Act (PIPEDA). PIPEDA came into effect January 1, 2004.

The ACFP is committed to keeping private information held on members and non-members, electronically or otherwise, private and secure. The ACFP will review, and when necessary, update its security measures to ensure that all information is held secure, and that appropriate security measures and technology are maintained to ensure security of personal information.

The ACFP places a high value on keeping employee information safe and secure and respects staff members' right of privacy. Therefore, the policies and procedures

contained in this Statement also relate to the protection of personal information of ACFP employees.

While the ACFP is not obligated legally to have a privacy policy in place, it is considered good business practice particularly in an environment that is very sensitive to issues of privacy.

It should be noted that the ACFP's policy statement and its procedures also comply with provincial privacy legislation. See Appendix A.

## **Ten Privacy Principles**

In our effort to protect the privacy of our members and non-members, the policy statements of the ACFP are framed around the ten privacy principles of the Personal Information Protection and Electronic Documents Act ("PIPEDA").

### **1. Accountability for Personal Information**

Definition: 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 established privacy principles.

### **2. Identifying Purposes of the Information**

Definition: The purpose for which the personal information is collected is identified by the organization before the time the information is collected.

### **3. Consent for the Collection, Use or Disclosure of Information**

Definition: The knowledge and informed consent of the individual are required for the collection, use, or disclosure of personal information.

### **4. Limiting Collection of Personal Information**

Definition: The collection of personal information is limited to that which is necessary for the purposes identified by the organization, and collected by fair and lawful means.

### **5. Limiting Use, Disclosure and Retention**

Definition: The organization will not use or disclose personal information for purposes other than those for which it was collected, except with the informed consent of the individual or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.

### **6. Accuracy of Personal Information**

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

**7. Safeguards for Personal Information**

Definition: Personal information is protected by security safeguards appropriate to the sensitivity of the information.

**8. Openness About the Management of Personal Information**

Definition: The organization makes information available about its policies and practices relating to the management of personal information.

**9. Individual Access to Personal Information**

Definition: Upon request, an individual is informed of the existence, use, and disclosure of his or her personal information and has access to that information. An individual has the ability to challenge the accuracy and completeness of the information and have it amended as appropriate.

**10. Challenging Compliance**

Definition: An individual has the ability to challenge the organization’s compliance with these principles, by contacting the designated individual or individuals accountable for the organization’s compliance.

**4.0 ACFP Privacy Policy Statements and Procedures**

The following policy statements are based on the ten Principles of the Personal Information Protection and Electronic Documents Act (“PIPEDA”), which became applicable to commercial organizations in Canada effective January 1, 2004. Although the ACFP engages in not-for-profit, non-commercial activities, we will, on a voluntary basis, endeavor to comply with these ten privacy principles. If, in the future, the ACFP becomes engaged in a commercial activity, then the ACFP must comply with these ten privacy principles for that activity.

**PRINCIPLE 1: Accountability for Personal Information**

The ACFP is responsible for personal information under its management and has designated an individual or individuals accountable for overseeing that the policy statements and procedures in this document are adhered to.

Policy Statements	Procedures
<p>Policy Statement 1.1</p> <p>The Executive Director of the ACFP is accountable for compliance with the privacy policies and procedures. The Executive Director may designate the day-</p>	<p>Procedure 1.1</p> <p>The day-to-day operational responsibility lies with the individual designated as the ACFP Privacy Officer. The Privacy Officer* will keep the Executive Director apprised</p>

<p>to-day operational responsibilities to other staff members.</p> <p>Decisions regarding the interpretation and application of the policies and procedures are the ultimate responsibility of the Executive Director</p>	<p>of any issues.</p> <p>As required, the Privacy Officer will consult with the Executive Director (who may or may not be the designated Privacy Officer) in implementing the policies and procedures, and in reviewing and amending the policies and procedures as required.</p>
<p>Policy Statement 1.2</p> <p>The ACFP collects, uses, and discloses personal information in accordance with current privacy legislation and this policy.</p>	<p>Procedure 1.2</p> <p>The ACFP staff is educated about the appropriate management of personal information.</p> <p>This information will be part of staff orientation.</p>

**PRINCIPLE 2: Identifying Purposes for Personal Information**

The ACFP is responsible for identifying the purpose for which the personal information is collected before the time the information is collected.

<b>Policy Statements</b>	<b>Procedures</b>
<p>Policy Statement 2.1</p> <p>The ACFP identifies the purpose for which personal information is collected from members and non-members at or before the time of access to, or the collection of the information.</p> <p>The need for the information is to be clearly documented.</p>	<p>Procedure 2.1</p> <p>ACFP staff will document the type and form of information to be collected and the reason (the need) for the information.</p> <p>In defining the purpose, the following needs to be considered:</p> <ul style="list-style-type: none"> <li>▪ The personal information to be collected and why it is being collected;</li> <li>▪ The handling and use of the personal information that is being requested; and</li> <li>▪ When, how and why personal information is made available.</li> </ul>
<p>Policy Statement 2.2</p>	<p>Procedure 2.2</p>

<p>The ACFP occasionally collects personal information to communicate to members and non-members about matters of interest to family physicians and for the following purposes: Newsletters, Updates, ASA registration, AFPRN Study recruitment, etc. Only personal information with an identified purpose is occasionally collected.</p>	<p>An approved purpose statement will be in place prior to the request for collection of personal information. (e.g. AFPRN Study recruitment)</p>
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**PRINCIPLE 3: Consent for the Collection, Use or Disclosure of Personal Information**

The ACFP will ensure that the individual’s knowledge and informed consent are obtained for the collection, use, or disclosure of personal information.

<b>Policy Statements</b>	<b>Procedures</b>
<p>Policy Statement 3.1</p> <p>The ACFP obtains consent from members and non-members for the collection, use, or disclosure of their personal information.</p>	<p>Procedure 3.1</p> <p>ACFP Staff will seek consent from the individual before information is collected or disclosed. At that time, the staff member will indicate the purpose for which the information is being collected, used, or disclosed, and seek consent.</p> <p>Staff will document the mechanism by which consent is obtained, i.e. by telephone, in writing, by email, etc. Implied consent is given when the action/inaction of an individual reasonably infers consent.</p> <p>By using the ACFP website, an individual consents to the collection, use, and disclose or information in accordance with ACFP’s Privacy Policy.</p>
<p>Policy Statement 3.2</p> <p>The ACFP does not disclose personal information for secondary or other purposes such as marketing.</p>	<p>Procedure 3.2</p> <p>ACFP staff members receiving a request for personal information for purposes other than originally intended will refer the request to the Privacy Officer for</p>



	<p>further consideration.</p> <p>The Privacy Officer will consider the merit of the request, guided by the policies and procedures contained in this document.</p> <p>Note that personal credit card information will be disclosed to the ACFP credit card payment merchant (currently Paymentech) to process the transaction as this is required to carry out business of the ACFP.</p>
<p>Policy Statement 3.3</p> <p>Consent is not a condition for supplying a service, unless the information requested is required to fulfill a specified and legitimate purpose (i.e. a member will not be denied the services of the ACFP if consent is not provided by the member).</p>	<p>Procedure 3.3</p> <p>ACFP staff will be guided by the policies and procedures contained in this document and the definitions for consent contained in the Definitions section of this document.</p>
<p>Policy Statement 3.4</p> <p>Anyone who uses the ACFP website consents to the collection, use, and disclosure of information in accordance with ACFP’s Privacy Policy.</p>	<p>Procedure 3.4</p> <p>The ACFP website is used to provide information to members, non-members, and the general public about the ACFP.</p> <p>The ACFP website is currently managed by the ACFP and hosted by Bubble Up Marketing. Anyone who uses this website consents to the collection, use, and disclosure of information in accordance with ACFP’s Privacy Policy.</p> <p>The ACFP website contains links to other sites. Once visitors link to another site, they are subject to the privacy policy of the new site. The ACFP encourages visitors to read the privacy policies of all websites visited.</p>

**PRINCIPLE 4: Limiting Collection of Personal Information**

The ACFP will limit the collection of personal information to that which is necessary to provide its services, as identified by the organization, to members and non-members, and collected by fair and lawful means.

<b>Policy Statements</b>	<b>Procedures</b>
<p>Policy Statement 4.1</p> <p>The ACFP only collects personal information necessary to fulfill the purpose identified for the information.</p>	<p>Procedure 4.1</p> <p>The reasons for collection of personal information will be clearly stated. ACFP staff will follow the approval process outlined in procedures 2.1 and 2.2.</p>
<p>Policy Statement 4.2</p> <p>The ACFP information collection practices are fair, lawful, and respectful of the individual.</p>	<p>Procedure 4.2</p> <p>The ACFP information collection practices will be reviewed by the Privacy Officer annually to ensure that practices are fair, lawful, and respectful of the individual.</p> <p>The Privacy Officer will report the findings to the Executive Director for review and further action.</p>
<p>Policy Statement 4.3</p> <p>The ACFP limits the collection of personal information through the ACFP website to that which is necessary to provide its services, as identified by the organization, to members and non-members.</p>	<p>Procedure 4.3</p> <p>When a person visits the ACFP website, the operating system may automatically record a limited amount of non-identifying information about their online visit for statistical purposes.</p> <p>The information collected from their visit is as follows:</p> <ul style="list-style-type: none"><li>▪ The Internet domain and Internet Protocol (IP) address from which they accessed the ACFP website</li><li>▪ The type of browser and operating system used to access the ACFP website</li><li>▪ The date and time they accessed the ACFP website</li><li>▪ The pages visited on the ACFP</li></ul>

	<p>website</p> <ul style="list-style-type: none"> <li>▪ The address of another website link, if any that brought, them to the ACFP website</li> </ul>
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**PRINCIPLE 5: Limiting Use, Disclosure and Retention of Personal Information**

The ACFP will not use or disclose personal information for purposes other than those for which it was collected, except with the informed consent of the individual or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.

<b>Policy Statements</b>	<b>Procedures</b>
<p>Policy Statement 5.1</p> <p>The ACFP uses or discloses information only for the purpose identified at the time of collection. New uses or disclosures are permissible only with the consent of the individual or as required or permitted by law.</p>	<p>Procedure 5.1</p> <p>The Executive Director or designate will ensure that the use or disclosure of information is consistent with the purpose identified, and to ensure compliance with the ACFP privacy policies and procedures.</p>
<p>Policy Statement 5.2</p> <p>The ACFP retains personal information for only as long as it is needed to achieve the identified purpose.</p> <p>The ACFP is guided by industry standards related to retention schedules or applicable legislation.</p>	<p>Procedure 5.2</p> <p>Retention schedules will be developed for the personal information being held by the ACFP. The retention schedules will be developed using industry standards or legislative requirements and will be distributed to all staff members.</p> <p>The Privacy Officer will ensure that ACFP staff members are aware and in compliance with the retention schedule(s).</p> <p>Where there is a question about the retention of personal information, the question will go before the Privacy Officer for review and recommendation. The recommendation will be forwarded to the Executive Director for final decision.</p> <p>Destruction of personal information will be the responsibility of the Privacy Officer.</p>

<p>Policy Statement 5.3</p> <p>The ACFP will communicate the limitations on use and disclosure of personal information to staff members.</p> <p>The ACFP allows staff to access and use personal information on a “need-to-know” basis, i.e. information required to perform their job.</p>	<p>Procedure 5.3</p> <p>The Executive Director or designate will inform staff members regarding the limitations on use and disclosure of personal information at the time of orientation of new employees and on an annual basis.</p>
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**PRINCIPLE 6: Accuracy of Personal Information**

The ACFP creates and maintains personal information records using the most accurate information available to it for the purposes for which it is to be used.

Policy Statements	Procedures
<p>Policy Statement 6.1</p> <p>The ACFP obtains and maintains personal information records for the purposes for which the information is collected, used, or disclosed, using the most accurate information available to it.</p>	<p>Procedure 6.1</p> <p>Each program area will define when updates are appropriate based on the purpose of the information use.</p>
<p>Policy Statement 6.2</p> <p>The ACFP updates personal information when necessary to fulfill the purpose for which the information was collected.</p>	<p>Procedure 6.2</p> <p>ACFP staff have a mechanism in place to update personal information on a timely basis.</p>

**PRINCIPLE 7: Safeguards for Personal Information**

The ACFP ensures personal information is protected by security safeguards appropriate to the sensitivity of the information.

Policy Statements	Procedures
<p>Policy Statement 7.1</p> <p>The ACFP takes reasonable measures to ensure that personal information is kept safe from loss or theft, unauthorized access, use, copying, disclosure of</p>	<p>Procedure 7.1</p> <p>ACFP staff will ensure that personal information is kept secure to limit access to personal information.</p>

<p>modification. These measures include:</p> <ul style="list-style-type: none"> <li>▪ Physical security of premises</li> <li>▪ Fireproof and locked file cabinets</li> <li>▪ Use of technological safeguards like security software, encryption and firewalls to prevent hacking or unauthorized computer access</li> <li>▪ Internal passwords</li> </ul>	<p>As mentioned under Policy 5.3, staff access and use of personal information is on a “need-to-know” basis, i.e. information required to perform their job.</p> <p>The Executive Director or designate will make staff aware of the importance of maintaining the confidentiality of personal information, by reviewing these policies and procedures with each staff member.</p>
<p>Policy Statement 7.2</p> <p>The ACFP has a higher level of protection safeguards for more sensitive information.</p>	<p>Procedure 7.2</p> <p>The ACFP will assess the sensitivity of personal information and put into place the necessary safeguards to protect the information.</p>
<p>Policy Statement 7.3</p> <p>The ACFP uses care in the disposal or destruction of personal information in order to prevent access to the information by unauthorized parties.</p>	<p>Procedure 7.3</p> <p>The Privacy Officer will ensure that the procedures to dispose of personal information are followed, e.g. shredding of the information and then disposal, destruction of electronic files before disposing of the equipment, etc.</p>
<p>Policy Statement 7.4</p> <p>The ACFP takes reasonable measures to ensure that personal information is protected when removed from the ACFP office.</p>	<p>Procedure 7.4</p> <p>ACFP staff will make reasonable efforts to ensure that any item, file, object, or document containing personal information will be kept secure when not in the ACFP office.</p> <p>Some reasonable measures staff will take include:</p> <ul style="list-style-type: none"> <li>▪ Not leaving information unattended unless securely stored</li> <li>▪ Keeping the information in their care while using various forms of transportation (plane, train, bus),</li> <li>▪ Ensuring that only as much personal information as is absolutely</li> </ul>

	necessary is removed from the ACFP office
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**PRINCIPLE 8: Openness about the Management of Personal Information**

The ACFP makes information available to its members and non-members about its policies and practices relating to the management of personal information.

<b>Policy Statements</b>	<b>Procedures</b>
<p>Policy Statement 8.1</p> <p>The ACFP has open and transparent information management practices that ensure accountability for personal information.</p>	<p>Procedure 8.1</p> <p>The ACFP will provide individuals with information on the organization’s privacy policies, procedures, and practices, when requested.</p>
<p>Policy Statement 8.2</p> <p>The ACFP makes information available about the privacy policies and practices.</p>	<p>Procedure 8.2</p> <p>Individuals wishing to review the policies and procedures will be directed to the office of the ACFP Privacy Officer. This request for information about the privacy policies and practices of the ACFP will be furnished in a timely manner to the individual requesting the information.</p> <p>The ACFP Privacy Policy will be posted on the ACFP website <a href="http://www.acfp.ca">www.acfp.ca</a>. The ACFP Privacy Policy will direct individuals to contact the ACFP Privacy Officer for further information on the ACFP Privacy Policy and Procedures.</p>
<p>Policy Statement 8.3</p> <p>The ACFP makes available the information about the person(s) responsible for the ACFP privacy policies and procedures.</p>	<p>Procedure 8.3</p> <p>The name of the Executive Director and Privacy Officer of the ACFP will be made available to anyone inquiring about the individuals accountable for personal information management practices within the ACFP.</p>

**PRINCIPLE 9: Individual Access to Personal Information**

Upon request, the ACFP informs an individual of the existence, use and disclosure of his or her personal information and the individual has access to that information. An individual has the ability to challenge the accuracy and completeness of the information and have it amended as appropriate.

<b>Policy Statements</b>	<b>Procedures</b>
<p data-bbox="232 470 505 501">Policy Statement 9.1</p> <p data-bbox="232 548 786 732">The ACFP informs an individual of the existence, use, and disclosure of his or her personal information upon request, and provides access at no cost to the individual.</p>	<p data-bbox="816 470 1005 501">Procedure 9.1</p> <p data-bbox="816 548 1380 850">Upon written request, the ACFP Privacy Officer will inform an individual of the personal information that the organization keeps and will provide the individual with access to the information. The ACFP Privacy Officer will respond within thirty (30) business days from the date the request was received.</p> <p data-bbox="816 896 1385 1043">The ACFP Privacy Officer will provide a convenient and quiet location where the individual can review the information at no cost to the individual.</p> <p data-bbox="816 1089 1385 1236">Upon request, the ACFP Privacy Officer will inform the individual how their personal information is being used and to whom it has been disclosed.</p>
<p data-bbox="232 1283 505 1314">Policy Statement 9.2</p> <p data-bbox="232 1360 776 1472">The ACFP provides the opportunity for an individual to correct inaccurate or incomplete information.</p>	<p data-bbox="816 1283 1005 1314">Procedure 9.2</p> <p data-bbox="816 1360 1380 1591">The ACFP Privacy Officer will receive information from the individual in order to correct inaccurate or incomplete information. The changes provided by the individual can be submitted in writing, by email, by fax or by telephone.</p> <p data-bbox="816 1638 1364 1785">The ACFP Privacy Officer will validate and amend the personal information within thirty (30) business days from the date of receipt of the information.</p>
<p data-bbox="232 1829 505 1860">Policy Statement 9.3</p>	<p data-bbox="816 1829 1005 1860">Procedure 9.3</p>

<p>Where the ACFP is unable to provide full access to an individual’s request for information, the reasons for limiting access are stated in a specific, reasonable, and justifiable manner.</p>	<p>The ACFP Privacy Officer will provide in writing to an individual the reason(s) for not providing full disclosure of the requested information. The Executive Director will review the draft response before it is finalized and sent to the individual.</p> <p>The ACFP Privacy Officer will provide the reason(s) in writing within thirty (30) business days from the date the request was received.</p>
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**PRINCIPLE 10: Challenging Compliance**

An individual has the ability to challenge the ACFP’s compliance with these principles, by contacting the designated individual or individuals accountable for the organization’s compliance.

<b>Policy Statements</b>	<b>Procedures</b>
<p>Policy Statement 10.1</p> <p>The ACFP provides a process for an individual to challenge the organization’s compliance with the stated privacy principles, policies, and practices.</p>	<p>Procedure 10.1</p> <p>Any individual who wishes to challenge the ACFP’s compliance with the stated privacy principles, policies, and practices will direct their inquiry in writing to the Executive Director of the ACFP.</p> <p>ACFP staff members will inform the individual to direct their inquiry in writing to the Executive Director of the ACFP.</p>
<p>Policy Statement 10.2</p> <p>The ACFP investigates all complaints.</p>	<p>Procedure 10.2</p> <p>The Executive Director (or Privacy Officer) will conduct an investigation into the complaint.</p> <p>The results of the investigation will be made available to the individual within 30 days from the date of receipt of the written complaint.</p> <p>The ACFP will take appropriate action to</p>



	rectify the situation if the complaint is justified, and the privacy policies and procedures will be amended if required.
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\* Note: The day-to-day privacy policies and procedures operational responsibility resides with the Privacy Officer. See attached Appendix B.

## Appendix A – Privacy Legislation

The province of Alberta has the following provincial privacy acts in force:

- **Personal Information Protection Act (PIPA)**  
The purpose of this Act is to govern the collection, use and disclosure of personal information by private sector organizations in a manner that recognizes both the right of an individual to have his or her personal information protected and the need of organizations to collect, use or disclose personal information for purposes that are reasonable.
- **Freedom of Information and Protection of Privacy Act (FOIP)**  
This law, proclaimed October 1, 1995, affects all provincial government departments, agencies, boards and commissions. The Act came into effect for school boards and charter schools on September 1, 1998, health care bodies on October 1, 1998, post-secondary educational institutions on September 1, 1999, and local government bodies on October 1, 1999. FOIP aims to strike a balance between the public's right to know and the individual's right to privacy, as those rights relate to information held by public bodies in Alberta.
- **Health Information Act (HIA)**  
HIA was proclaimed April 25, 2001, and spells out how health information is to be collected, protected and used. This law affects doctors and their staff, hospitals, health boards, regional health authorities (RHA's) and Alberta Health and Wellness (AHW)

The federal government has the following privacy act in force:

- **Personal Information Protection and Electronics Documents Act (PIPEDA)**  
PIPEDA, a federal law, was introduced in order to protect the privacy rights of an individual in connection with his/her personal information. It was also established to recognize certain needs to collect, use, and disclose personal information and to set forth the criteria whereby such personal information could be so collected, used and disclosed. Another objective of PIPEDA was to acknowledge the validity and legality of electronic documents. PIPEDA became applicable to commercial organizations in Canada effective January 1, 2004.

Alberta's **Personal Information Protection Act (AB PIPA)** legislates how organizations operating in Alberta collect, use and disclose client and employee privacy. The federal **Personal Information Protection and Electronics Documents Act (PIPEDA)** applies to client and employee privacy information that crosses Alberta's provincial or Federal border.

PIPEDA and PIPA have been determined to be substantially similar. The following Exemption Order for Alberta was registered and appears on the Government of Canada's official website - <http://strategis.ic.gc.ca/epic/internet/inecic-ceac.nsf/en/gv00236e.html>.

*“Based on the recommendation by the Minister of Industry that the Alberta Personal Information Protection Act (PIPA) and the British Columbia Personal Information Protection Act (PIPA) are substantially similar to the Personal Information Personal Information Protection Act (PIPEDA), the Orders propose to exempt from the federal Act, organizations subject to the law of either province, in respect of all collections, uses or disclosures of personal information that take place within the province. The PIPEDA will continue to apply to the activities of federal works undertakings or businesses and to the collection, use or disclosure of personal information outside the province, in the course of commercial activity.”*

#### **ORGANIZATIONS IN THE PROVINCE OF ALBERTA EXEMPTION ORDER**

##### **EXEMPTION**

1. An organization, other than a federal work, undertaking or business, to which the Personal Information Protection Act, S.A. 2003, c.P-6.5, of the Province of Alberta, applies is exempt from the application of Part 1 of the Personal Information Protection and Electronic Documents Act, in respect of the collection, use and disclosure of personal information that occurs within the Province of Alberta.

##### **COMING INTO FORCE**

2. This Order comes into force on the day on which it is registered.

## Appendix B – Privacy Officer

A Privacy Officer oversees all the activities related to the development, implementation, maintenance and adherence to the organization's privacy policies and procedures. These policies cover the privacy of, and access to, consumer information in compliance with federal and provincial laws and information privacy best practices.

The ACFP Privacy Officer job description was drafted with the following factors in mind:

- The size and structure of the ACFP as a not-for-profit organization. (I.e. single office location, fewer than 10 employees, etc.)
- The ACFP collects and holds a minimal amount of personal information.
- The ACFP does not collect members' personal information directly, however from time to time it is necessary for the ACFP to attain member and non-member personal information for special initiatives i.e. Newsletter mailings, ASA, AFPRN Research Study recruitment, etc.)

The Executive Director or designate will act as the Privacy Officer of the ACFP. The operational responsibility of the day-to-day privacy policy statements and procedures lies with the ACFP Privacy Officer. The Privacy Officer will keep the Executive Director apprised of any issues.

Responsibilities:

- Encourage compliance with the Ten Principles (as outlined in PIPEDA) for the Protection of Privacy.
- Respond to requests for access to the ACFP Privacy Policy and Procedures document and general issues concerning personal information.
- Work with the ACFP Executive Director and the offices of the provincial and federal Privacy Commissioners during the investigation of a privacy complaint against the organization.
- Ensure the delivery of initial privacy training and orientation for all new staff members.
- Ensure the use or disclosure of information is consistent with the purpose identified at time of collection.
- Monitor and ensure compliance with the ACFP Privacy Policy and Procedures document.
- Review the ACFP Privacy Policy and Procedures document every two years to ensure the practices are fair, lawful, and respectful of the individual. Report findings to the Executive Director.
- Dispose of personal information in a manner, which protects the information from unauthorized parties.
- Investigate all complaints received regarding the collection, use, and storage of personal information, and report the findings to the Executive Director.

**Appendix C – Collection, Use, Disclose, and Discard Document**

**Approval Authority:** ACFP Board  
**Approval Date:** October 2005  
**Last Review:** October 2005

**ACFP Collection, Use, Disclose, Store/Discard  
 August 2005**

**PRIVACY POLICY – REVIEW** of information collected by ACFP for the purposes identified by the ACFP for business.

**The ACFP collects the following personal identifiable information:**

Collection (to call for and receive)	Use (the purpose for which something is used)	Disclose (to reveal)	Store or discard (shred)
<b>CME applications</b>			
Provider - name, business phone number and street address, postal code, email address, and cheque.  ACFP member involved – name, phone number	<p><b>Provider</b> - The provider information is collected to advise the accreditation status of the MAINPRO-M1 application.</p> <p>ACFP Member information is collected as part of the MAINPRO criteria in order to verify physician’s membership</p>	<p><b>Provider</b> - Provider/ACFP member information is submitted to CFPC National office (copy of M1 Application form) for the purpose of posting CME program details their website.</p> <p>In addition, this information is tracked by National in order to</p>	<p><b>Provider</b> - MAINPRO-M1 applications are stored in file cabinets in the ACFP office for future reference or verification on program status, date(s), etc.</p> <p>All information to be shredded when discarding.</p>

	in ACFP and appropriate involvement in the CME program.	verify physicians' CME membership requirements.	
<b>Annual Scientific Assembly (ASA)</b>			
<b>Registrants</b> - name, phone/fax number, mailing address, email address, names of additional family members and/or guests, cheque.	<b>Registrants</b> – personal information is collected for the purpose of confirming registration, communicating about the conference, and issuing follow-up MAINPRO C certificates.	Registrants – personal information is disclosed to the authorized body providing MAINPRO C courses at the conference for the purpose of distributing pre-conference workshop materials and post-conference follow-up as per the CFPC MAINPRO C criteria. A <u>single</u> master list of all registrants (names only) is maintained and available at the conference registration desk	<b>Registrants</b> – ASA personal registration information is kept on file for a period of 5 years.  All information to be shredded when discarding.
<b>Exhibitors</b> – name(s), employer, phone/fax numbers, mailing address, email address, cheque.	<b>Exhibitors</b> -personal information is collected for the purpose of communicating with speakers about their commitment to presenting at the ASA.	<b>Exhibitors</b> – personal information is not disclosed or published to outside sources.	<b>Exhibitors</b> – personal information is stored for a period of 2 – 3 years in order to reference for future events.  All information to be shredded when discarding.
<b>Speakers</b> – name, phone/fax numbers, mailing address, email address.	<b>Speakers</b> – personal information is collected for the purpose of communicating with speakers about their commitment to presenting at	<b>Speakers</b> - speaker names and credentials are published in the ASA conference brochure. No other personal information is disclosed without the explicit	<b>Speakers</b> - personal information is stored for a period of 2 – 3 years in order to reference for future events.

	the ASA.	and prior consent of the Speaker (i.e. for communication purposes between a registrant or sponsor and speaker).	All information to be shredded when discarding.
<b>Sponsors</b> – employee/contact name, phone/fax numbers, mailing address, email address, cheque	<b>Sponsors</b> - personal information is collected for the purpose of communicating with speakers about their commitment to presenting at the ASA.	<b>Sponsors</b> – personal information is not disclosed or published to outside sources.	<b>Sponsors</b> - personal information is stored for a period of 2 – 3 years in order to reference for future events.  All information to be shredded when discarding.
<b>Poster Session</b> – (see Research)	<b>Poster Session</b> – (see Research)	<b>Poster Session</b> – (see Research)	<b>Poster Session</b> – (see Research)
<b>Awards</b>			
AB FPOY – nominee & nominator name, phone/fax numbers, mailing address, email addresses, practice profile, graduation/credential info.	<b>AB FPOY</b> - personal info. is collected for the purpose of communicating the successful nomination to the ACFP membership and general public.	<b>AB FPOY</b> – selective personal info. is revealed for the purpose of a News Release, ACFP publication, and to the CFPC for the purpose of the selection of Canada’s Family Physician of the Year Award.	<b>AB FPOY – limited personal</b> information is kept on file for historical information purposes.  Do not shred or discard.
CARE – nominee & nominator name, phone/fax numbers, mailing address, email addresses, practice profile.	<b>CARE</b> - personal info is collected for the purpose of communicating the successful nomination(s) to the ACFP membership and general public	<b>CARE</b> - selective personal info. is revealed for the purpose of a News Release and ACFP publication via Newsletters/Updates, website, etc.	<b>CARE</b> – limited personal information is kept on file for historical information purposes.  Do not shred or discard.

FM Awards (UofA,UofC) – name of recipient, mailing address (\$300 ACFP Award awarded by respective Universities)	<b>FM Awards</b> – personal info. is collected for auditing purposes and to communicate congratulations from the ACFP.	<b>FM Awards</b> – award recipient name and university is disclosed to the membership through ACFP publications.	<b>FM Awards</b> – limited personal info. is kept on file for auditing and historical information purposes.  Do not shred or discard.
<b>Research</b>			
<b>Research Study</b> – name of PI, mailing address, phone/fax numbers/email address	<b>Research Study</b> – personal info. is collected for the purpose of entering into an agreement with the PI for physician recruitment and for communication for further follow-up on study results.	<b>Research Study</b> – a copy of the agreement is sent to the PI of the research study for their records. The Agreement is made available to ACFP auditors.	<b>Research Study</b> – agreements are kept on file for a minimum period of 7 years.  All information to be shredded when discarding.
<b>Physician Recruitment (Card Survey)</b> – name, mailing address, phone/fax numbers, email addresses	<b>Physician Recruitment (Card Survey)</b> – personal info. is collected from physicians interested in a particular study.	<b>Physician Recruitment (Card Survey)</b> – selected personal info. is forwarded to the Research Study PI or Coordinator for the purpose of further communication between the physician and researcher on the study.	<b>Physician Recruitment (Card Survey)</b> – Spreadsheets and cards are kept on file for a period of 5 years.  All information to be shredded when discarding.
<b>Membership</b> – name, mailing address, phone/fax numbers, email address, practice profile	<b>Membership</b> - personal info. is collected in order to maintain communication with regards to research matters that may be of interest to family physicians.	<b>Membership</b> – AFPRN membership lists are available to staff to conduct the business of AFPRN. Personal information is not disclosed to outside sources.	<b>Membership</b> – AFPRN membership lists will be maintained and updated on an annual basis, and stored on the ACFP computers and in the files. Outdated lists and/or information will be deleted from the system and



			shredded from the files on an annual basis.
<b>AFPRN Poster Presentation at ASA</b> – PI name, email address, phone/fax number, mailing address, cheque	<b>AFPRN Poster Presentation at ASA</b> – personal info. is collected from poster presenters whose abstracts have been submitted and accepted for display at the Annual Scientific Assembly Poster Presentation, for the purpose of communication.	<b>AFPRN Poster Presentation at ASA</b> – <b>Abstracts</b> and contact info. may be included on the ACFP website in the future.	<b>AFPRN Poster Presentation at ASA</b> – abstracts are kept on file at the ACFP office for a period of 5 years.  All information to be shredded when discarding.
<b>Email List Serve</b>			
<b>General Messages</b>	<b>General Messages</b> - Sent to inform/update the ACFP membership. We <u>do not</u> 'collect' personal information (i.e. email addresses) in order to send these messages. Member information sent directly from the CFPC. However, we do receive the <i>non-deliverable</i> emails.	<b>General Messages</b> - Non-deliverable emails are occasionally forwarded to CFPC National for their use in maintaining accuracy of the ACFP Membership database.	<b>General Messages</b> - Non-deliverable emails are deleted from the system.
<b>Request for representatives</b> – name, mailing address, phone/fax numbers, practice profile, email address.	<b>Request for representatives</b> – The personal info. collected is used to confirm and communicate their representation on behalf of the ACFP to the various	<b>Request for representatives</b> – The personal info. collected is disclosed to the external organization (AMA, AHW, CPSA, CFPC) by letter or email in order to facilitate communication	<b>Request for representatives</b> – Copies of documentation regarding representative and correspondence between ACFP and external organizations are kept in our

	external committees.	between the ACFP and its representative and the external committee.	files for future reference for 3 years.  All information to be shredded when discarding.
<b>Mail</b>			
<b>CME applications</b> – see above	<b>CME applications</b> – see above.	<b>CME applications</b> – see above	<b>CME applications</b> – see above
<b>Membership change of address notices</b>	<b>Membership change of address notices</b> – our office <u>does not</u> maintain the ACFP membership database.	<b>Membership change of address notices</b> – change of address notifications from members are forwarded to the CFPC Membership Department	<b>Membership change of address notices</b> – Correspondence is deleted from the system and/or shredded.
<b>Membership Reports from National</b>	<b>Membership Reports from National</b> - Sent to us from National for information only.	<b>Membership Reports from National</b>	<b>Membership Reports from National</b> - Membership statistical information is kept in our files for a period of 1 year.  All information to be shredded when discarding.
<b>Member and non-member requests for information</b>	<b>Member and non-member requests for information</b> - The ACFP may use personal information collected from members and non-members through the mail to respond to requests.	<b>Member and non-member requests for information</b> – personal information may be disclosed to ACFP staff, Executive or Board for the purpose of responding to the request.	<b>Member and non-member requests</b> – kept on file for a period of 1-2 years.  All information to be shredded when discarding.

<b>Family Health Magazine</b>			
<b>In-house Distribution List</b> – name, mailing address	<b>In-house Distribution List</b> is used solely for the purpose of distributing the Family Health publication on to interested parties.	<b>In-house Distribution List</b> is not revealed to any external sources.	<b>In-house Distribution List</b> is kept in our files for use on a quarterly basis. This list is updated on a regular basis.  All information to be shredded when discarding.
<b>Website</b>			
<b>Website ‘Contact Us’</b> – name and email address.	<b>Website ‘Contact Us’</b> - The ACFP may use personal info. collected from members and non-members through the website to respond to requests.	<b>Website ‘Contact Us’</b> – personal info. collected may be communicated/forwarded to ACFP or CFPC staff, or an appropriate ACFP committee member for response.	<b>Website ‘Contact Us’</b> – correspondence relating to the business of the ACFP is kept on file for a period of 1-2 years.  All information to be shredded when discarding.
<b>Email</b>			
<b>Unsolicited Email</b> – name and email address.	<b>Unsolicited Email</b> - The ACFP may use personal info. collected from unsolicited emails to respond to requests.	<b>Unsolicited email</b> – personal info. collected may be communicated/forwarded to ACFP or CFPC staff, or an appropriate ACFP committee member for response.	<b>Unsolicited email</b> – correspondence that relates to the business of the ACFP is kept on file for a period of 1-2 years.  All information to be shredded when discarding.

<b>Banking Information</b>			
<b>Signing authority for ACFP Accounts</b> – names, position titles on ACFP Board, signatures, 2 pieces of ID	<b>Signing authority for ACFP Accounts</b> – this information is collected for the purpose of changing authorized signatories for ACFP bank accounts.	<b>Signing authority for ACFP Accounts</b> – information is collected and disclosed to the CIBC at their request in order to recognize authorized ACFP signatures.	<b>Signing authority for ACFP Accounts</b> – a duplicate of the information collected is kept at the ACFP office in a locked accounting file. Information is to be kept for a period of 5 years, and is dependent on active signatures.  All information to be shredded when discarding.
<b>D &amp; O Insurance</b>			
<b>Coverage</b> - ACFP Board of Director names, position on ACFP Board	<b>Coverage</b> – to engage in and maintain Liability insurance coverage for ACFP Executive Director and Board members.	<b>Coverage</b> – names and positions on the ACFP Board are disclosed to the appropriate insurance company for coverage. All changes to the ACFP Board composition are sent, on a regular basis, as per the terms of coverage.	<b>Coverage</b> – files containing the policy and correlating correspondence are kept for a period of 7 years. Old documents are shredded.
<b>Other</b>			
<b>ACFP Committee representatives (internal and external)</b> – names, mailing address, phone/fax numbers/email address	<b>ACFP Committee representatives (internal and external)</b> - The personal info. collected is used to confirm and communicate their	<b>ACFP Committee representatives (internal and external)</b> - The personal info. collected is disclosed to the external organization (AMA,	<b>ACFP Committee representatives (internal and external)</b> – all correspondence (incl. regular requests for reports) are

	representation on behalf of the ACFP to the various external committees.	AHW, CPSA, CFPC) by letter or email in order to facilitate communication between the ACFP and its representative and the external committee.	stored within the ACFP files. This information is to be archived for historical purposes.  Do not shred or discard.
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