

Privacy Policy

Policy Section: General Administration	Policy Number: GA-15	Approved By: CEO/Registrar
Regular Policy Review Frequency: Every five years	Date Approved: June 6, 2024	Date Reviewed/Revised: September 13, 2024

Policy:

The College is committed to protecting personal information. This includes personal information belonging to members of the public, current registrants, past registrants, applicants, website visitors, and other individuals whose personal information is entrusted to the College.

1. IMPORTANT DEFINITIONS

For the purposes of this Privacy Policy, the following words have the following meanings:

“**Act**” means *The Regulated Health Professions Act, C.C.S.M c R117 (Manitoba)*.

“**Applicant**” means an individual who has applied to the College for registration.

“**Model Code**” means the *Canadian Standards Association Model Code for the Protection of Personal Information, CAN/CSA-Q830-96*.

“**Personal information**” means any factual or subjective information, recorded or not, about an identifiable individual. This includes name, contact information, birth date, educational background, or work history as well as any sensitive information such as financial data. Personal information may include personal health information but does not include aggregate information that cannot be linked to a specific individual.

“**Personal health information**” per the definition in *The Personal Health Information Act, C.C.S.M c.P33.5* means recorded information about an identifiable individual that relates to the individual’s health, or health care history, including genetic information about the individual, the provision of health care to the individual, or payment for health care provided to the individual, and includes any identifying information about the individual that is collected in the course of, and is incidental to, the provision of health care or payment for health care, including the PHIN and any other identifying number, symbol or particular assigned to an individual.

“**PHIA**” means *The Personal Health Information Act, C.C.S.M. c. P33.5 (Manitoba)*.

“**Registrant**” means an individual who is registered to practice as a Registered Nurse or Registered Nurse (Nurse Practitioner) in Manitoba.

“**Regulations**” means the *College of Registered Nurses of Manitoba General Regulation, M.R. 114/2017* and the *Practice of Registered Nursing Regulation, M.R. 113/2017*

“**Site**” means <https://www.crnmb.mb.ca/>, which is operated by the College.

“**User**” means an individual who visits the Site.



2. ACCOUNTABILITY FOR PRIVACY

The College takes full responsibility for the protection of personal information that it collects, uses, and discloses in the course of fulfilling its mandate as a regulatory body under the Act and the Regulations.

The College collects, uses, and discloses information in accordance with its obligations under the Act. In fulfilling its mandate, the College is also guided by the best practices of the privacy principles contained in the Model Code.

The College will ensure the appointment of a Privacy Officer who oversees information-handling practices and the College's privacy management program. The Privacy Officer's duties will include, but are not limited to:

- Developing and regularly reviewing the implementation of internal policies and procedures relating to the collection, use, disclosure, retention, and protection of personal information;
- Ensuring all staff are trained on privacy best practices and are aware of the importance of safeguarding any personal information that they are privy to;
- Ensuring all inquiries and complaints relating to privacy are appropriately handled; and
- Ensuring all possible safeguards are in place for third-parties with which the College shares personal information.

3. COLLECTION OF PERSONAL INFORMATION

The College will collect personal information from individuals with their knowledge and consent in several ways. For example:

- The College collects personal information from members of the public when they inform us of concerns about a registrant's practice or conduct or when they submit a complaint;
- The College collects personal information from registrants and applicants during application and renewal processes, and through registrant learning plans and assessments.

The College will identify when information may be provided optionally and when it is necessary to fulfill its obligations under the Act.

There are instances where the College has the legal authority to obtain records and collect, use, and disclose personal information and personal health information without consent. For example, this may occur at the request of a government department, during a professional conduct investigation, or to protect the interests or safety of the public.

4. WEBSITE PRACTICES

The College may collect technical information regarding users' sessions, while the users remain anonymous, to permit statistical analyses of users' behavior (for the purpose of improving the design of the website).

Only aggregated data from these analyses, not individual data, will be used for this purpose. The College will not seek to match IP addresses to identifiable individuals unless the user is engaged in illegal behavior.



Information the College may collect from visits to the College's website may include:

- a) the IP address of the computer and browser used to view the website;
- b) operating system;
- c) resolution of screen;
- d) location;
- e) language settings in browsers; and/or
- f) the site that the user came from and if arriving from a search engine, the keywords that were searched.

5. SHARING PERSONAL INFORMATION

The College will take all reasonable steps to protect the interest of individuals when disclosing personal information.

Personal information may be disclosed to:

- a) employees, independent contractors, agents, and service providers as is reasonably necessary to enable these parties to perform a business, professional or technical support function to assist the College in fulfilling its mandate;
- b) a third party or parties, provided with written consent; and/or
- c) a third party or parties, where required or permitted by law. For example:
 - i. Where the disclosure is necessary to administer or enforce the Act, the Regulations, or the by-laws, standards of practice, code of ethics or practice directions issued by the College, including where disclosure is necessary to register applicants, issue certificates of practice, permits and licenses, grant approvals or authorizations, deal with complaints or allegations that a registrant is incapable, unfit or incompetent, deal with allegations of professional misconduct, or govern the profession;
 - ii. Where the information is disclosed to a person who employs or engages a registrant to provide health care, or to a hospital or health authority that grants privileges to a registrant, if the purpose of the disclosure is to protect any individual or group of individuals;
 - iii. Where the information is disclosed to a government department, a health authority or another government agency that deals with health issues;
 - iv. Where the disclosure is necessary to obtain legal advice or legal services.

The College will only disclose personal information if non-identifying information will not accomplish the purpose for which the information is disclosed. The College will limit the personal information disclosed to the minimum amount necessary to accomplish the purpose for which it is disclosed.

Sharing with government entities:

The College may share personal information with the provincial government when required to do so by a government department.



The College may also provide data to different government entities as required for specific purposes such as reports produced by the Fair Registration Practices Office; however, in those circumstances, data is provided in an aggregate format with no individually identifiable information provided.

Sharing with researchers, research organizations or students:

The College may provide aggregate data to non-commercial researchers, research organizations or students upon request where their work provides a benefit to the public. No identifying personal information will be provided.

The College may also distribute research participation invitations or communications on behalf of non-commercial researchers, research organizations or students where such parties have demonstrated ethical approval from the sanctioning organization for their research and where their work provides a benefit to the public. In such cases, the College does not share the contact information of registrants with the researcher or student. Where a registrant chooses to respond to such invitations, the College is not responsible for the protection of any personal information that the registrant provides directly to the researcher or student.

Sharing with third-party service providers:

The College takes reasonable steps to ensure that any third-party service providers entrusted with personal information are reputable and have safeguards in place to protect this information. In working with service providers, personal information may be transferred to a foreign jurisdiction to be processed or stored. Such information may be provided to law enforcement or national security authorities of that jurisdiction upon request, in order to comply with foreign laws.

6. SECURITY OF PERSONAL INFORMATION

The College will implement procedures to guard against unauthorized or unlawful access to personal information. Procedures will also be put in place to avoid accidental loss or destruction of, or damage to personal information.

7. RETENTION OF PERSONAL INFORMATION

- The College will only retain personal information for as long as reasonably necessary to fulfill the purpose for which it was collected and to comply with legal or regulatory obligations, in accordance with approved retention schedules.
- Once personal information is no longer required by the College to fulfil its purpose or to meet legal or regulatory requirements, it is securely destroyed, erased, or made anonymous.

8. INQUIRIES

Any inquires, concerns or complaints regarding privacy should be directed to the College's Privacy Officer at:



College of Registered Nurses of Manitoba

Privacy Officer

College of Registered Nurses of Manitoba

890 Pembina Highway

Winnipeg, MB

R3M 2M8

Tel: 204-784-5187 or 1-800-665-2027 (toll-free in Canada), Ext. 187

privacyofficer@crnm.mb.ca

E-mail or text messaging are not secure forms of communication. Please do not send confidential personal information to us this way.

Related Policies, Publications and Procedures:

N/A

References:

The Regulated Health Professions Act - <http://web2.gov.mb.ca/laws/statutes/2009/co1509e.php>

Freedom of Information and Protection of Privacy Act (FIPPA)-
<https://web2.gov.mb.ca/laws/statutes/ccsm/f175.php?lang=en>

Personal Health Information Act of Manitoba (PHIA) - <https://web2.gov.mb.ca/laws/statutes/ccsm/p033-5.php?lang=en>

Office of the Privacy Commissioner of Canada - <https://www.priv.gc.ca/>

PIPEDA fair information principles - https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/p_principle/