



Newfoundland and Labrador Pharmacy Board

Registration Policy

Collection, Use and Disclosure of Registrants' Personal Information

October 2023

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

In this document, “personal information” is defined as information about an identifiable individual or information that can be readily processed to produce information about an identifiable individual. Publicly available information, and aggregate information that cannot be used to produce information about identifiable individuals, is not considered personal information.

COLLECTION OF PERSONAL INFORMATION

NLPB may collect the following personal information about a registrant, either directly from the registrant or indirectly from other individuals or organizations:

Demographic

Name, date of birth, contact information, gender, sex at birth, languages spoken, ethnicity, indigenous identity.

Education/Certification

Pharmacy-related degree(s) or diploma(s) granted, institution from which degree(s) or diploma(s) were granted, date of graduation, expected date of graduation, Pharmacy Examination Board of Canada examination results and registration number, English language proficiency results, and any other education or certification related to the pharmacy profession.

Registration

Professional liability insurance information, information pertaining to practice-related authorizations or conditions/restrictions, and information about current or past registration with pharmacy regulatory authorities in other jurisdictions.

Practice Site

Practice site, location and contact information of practice location, employment- and employer-related information.

Quality Assurance

Information about quality assurance activities, including professional development details and assessment results.

Complaints and Discipline

Information related to complaints and discipline allegations and investigations, information about current or past discipline history with other professional regulatory bodies, records of charges, findings of guilt, or convictions under any statute in Canada or another country.

USE AND DISCLOSURE OF PERSONAL INFORMATION

NLPB may use and disclose personal information about registrants for the purposes of:

- a) initial registration;
- b) registration renewal;

- c) maintaining required registers and records;
- d) professional development and education;
- e) practice-based information or research;
- f) populating electronic health systems;
- g) health promotion programs;
- h) Health Canada notices;
- i) workforce planning and management;
- j) confirmation of discipline procedures;
- k) provision of information related to registration, registration status, or standing to:
 - i) third party payers;
 - ii) drug distributors (wholesalers and manufacturers); or
 - iii) a member of the public or media;
- l) provision of information related to registration, registration status, or standing or disciplinary history to:
 - i) other pharmacy regulatory authorities; or
- m) any purpose that it is mandated by legislation or a regulatory necessity.

CONSENT

Consent will be obtained prior to collecting, using, or disclosing personal information from registrants, when possible, except in circumstances where collection, use, or disclosure without consent is required by law or for the purposes of an investigation by an authorized organization or law enforcement. Consent is not required prior to collecting, using, or disclosing personal information that is publicly available (e.g., registration status, place of work).

A registrant may at any time withdraw consent, subject to legal or contractual restrictions and reasonable notice, by giving notice in writing to NLPB. Such withdrawal of consent cannot be retroactive. Prior to withdrawing consent, registrants are advised to contact the Registrar for more information regarding the process and implications of withdrawing consent, including, without limitation, the possibility of no longer being able to remain a registrant.

OPENNESS AND ACCESS

NLPB will provide information about the policies, procedures and practices related to its management of personal information. A registrant can access any personal information on file about themselves, except where limited by law.

ACCURACY AND INTEGRITY

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

A registrant has the right to question the accuracy of information on file concerning themselves, and to request corrections to be made to such information.

SECURITY

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

CHALLENGING COMPLIANCE

A registrant has the right to challenge NLPB's compliance with these policies by making a complaint in writing to the Registrar. Complaints that are not handled to the registrant's satisfaction may be appealed to the board.