

Policy: Privacy Policy
Approval Date: August 12, 2020
Approved Revision Date: Original
Other: N/A

Policy Number: A103



Purpose

NNAS is committed to maintaining the accuracy, confidentiality, and security of the personal information it receives. As part of this commitment, NNAS's Privacy Policy governs the actions that relate to the collection, use and disclosure of Personal Information. Although the federal Personal Information Protection and Electronic Documents Act (PIPEDA) does not apply to NNAS' activities, NNAS is committed to ensuring that the foundation of NNAS' privacy policy is based on principles stipulated in PIPEDA.

Definition

"Personal Information" is any information that is identifiable as an individual. This information may include but is not limited to a person's name, mailing address, e-mail address, telephone number, and information that is submitted to NNAS (or that third parties submit to NNAS on an individual's instruction) concerning their academic and/or employment history (including curricula, transcript, previous employers). Personal Information, however, does not include any information that is solely used to communicate with an individual in relation to their employment, business or profession, such as their name, position name or title, work address, work telephone number, or work electronic address.

Identifying Purposes

NNAS collects and uses personal information for purpose of assessing the credentials of IENs, for example to:

1. Determine if an applicant is eligible for NNAS' services
2. Process applications and payments for applicant services
3. Maintain credentialing records for comparison
4. Administer applicant services
5. Support applicant services requests and resolve applicant issues
6. Comply with legal and regulatory requirements
7. Contact applicants and ask for their feedback
8. Keep applicants informed about NNAS' services and programs
9. Support other activities that are consistent with these purposes and NNAS' credentialing services generally

NNAS limits access to personal information to NNAS' employees and agents who require it to administer and deliver NNAS' assessment and credentialing programs. NNAS does not sell or trade any of the personal information NNAS collects.

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Consent

Where possible NNAS will seek a person's consent before NNAS collects or uses the person's personal information. Most often NNAS asks for consent in writing but the form of consent might vary depending on the situation. In some cases, NNAS may accept verbal consent. Consent can be expressed, for example in writing, or it might be implied through conduct or because of the nature of a person's relationship with NNAS.

A person can withdraw their consent. This will affect the services NNAS can provide to the person and might make it impossible for NNAS to provide credentialing services.

Limiting Use, Disclosure and Retention

If NNAS intends to disclose personal information to a third party NNAS will identify them and the purposes of disclosure and seek consent, unless a law permits or requires us to disclose the information without consent.

NNAS may disclose personal information to:

1. Third party service providers with whom NNAS has a written agreement containing appropriate privacy protections,
2. Licensing, regulatory and credential verification organizations, and
3. Other organizations with the consent of the applicant.

Accuracy

NNAS takes steps to ensure personal information is kept accurate. But NNAS does not routinely update personal information unless a process or activity requires it. Those using NNAS' services are strongly encouraged to notify NNAS if their information changes. Should those using NNAS' services notice that the information NNAS has about the service user is inaccurate they should contact NNAS and NNAS will amend it. If NNAS has disclosed inaccurate information NNAS will contact the third parties to correct it.

Safeguarding Applicant Information

Personal Information will be protected by security safeguards that are appropriate to the sensitivity level of the information. NNAS takes reasonable precautions to protect all Personal Information from any loss or unauthorized use, access or disclosure. Should a privacy breach occur, the NNAS Executive Director will be notified immediately and follow necessary reporting procedures.

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Third-Party Service Providers

Contracted third parties used to carry out or manage programs or services on behalf of NNAS are required to provide necessary safeguards and privacy policies that are equivalent to NNAS standards. Any privacy breach that occurs must be reported immediately to the NNAS Executive Director.

Applicant Access

An individual can request access to their Personal Information that is under NNAS' control. NNAS will disclose that information to the individual making the request unless there is a compelling reason not to, for example if a law prohibits disclosure. In some cases, NNAS will have to redact part of the document that contains personal information. All requests for access should be made in writing. NNAS may charge a small fee to cover NNAS' costs to produce the information.

Handling Customer Complaints and Suggestions

Any questions or enquiries with respect to NNAS Privacy Policy or NNAS practices, should be directed in writing to:

Senior Policy and Research Analyst
National Nursing Assessment Service
439 University Avenue, 5th Floor
Toronto, Ontario
M5G 1Y8
Email: privacy@nnas.ca