

# Faculty of Health Sciences

## Policy: Access and Storage of Immunization Information

### PURPOSE:

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The purpose of this policy is to outline the process for accessing and storing immunization records for practice instructors, faculty advisor/supervisor /liaison and students in the Faculty of Health Sciences, and to provide guidance in the event of an outbreak, epidemic, or pandemic.

### DEFINITIONS:

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**Immunization:** Administration of provincially funded vaccines (i.e. primary series adult boosters where indicated, and seasonal/annual vaccines)

**Practice Instructor:** Faculty of Health Sciences instructors who teach students in the clinical practice setting.

**Faculty Advisor/Supervisor/Liaison:** Faculty of Health Sciences professors or instructors who supervise students in the practice setting.

### POLICY SCOPE:

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This policy applies to all Faculty of Health Sciences practice instructors, faculty advisors/supervisor/liaison, and students undertaking an experiential learning practicum.

### POLICY STATEMENT(S):

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1. "Vaccines are a cornerstone of public health and their use has significantly contributed to the prevention and control of infectious diseases in Canada and internationally." (Canadian Immunization Guide, 2020)
2. Immunizations are not mandated; however, in accordance with practice partnership agreements all practice instructors, faculty advisors/supervisors/liaisons, and students should ensure they are aware of the policies and guidelines related to immunization for the province, organization, or agency, and the implications of being under-immunized in the event of an outbreak, epidemic, or pandemic.
3. Removal from the practice setting during times of outbreak, epidemic, or pandemic is likely the consequence of being under-immunized.
4. The health and safety of practice instructors, faculty advisors/supervisors/liaisons, and students are a top priority. Ensuring immunization records are easily accessible is vital in all practice settings, as well as in times of an outbreak, epidemic, or pandemic.

5. If an under-immunized student is removed from the practice site due to an outbreak, epidemic or pandemic, the pause in their experience may impact the student's ability to meet course outcomes and be successful in the course. Students unable to meet course outcomes may be required to withdraw from the program. The required withdrawal calendar statement is available in the Undergraduate Calendar.
6. Assignment to practice settings may be affected if a practice instructor or faculty advisor/supervisor/liaison is under-immunized.
7. In the event of an outbreak, epidemic, or pandemic, under-immunized practice instructors, faculty advisors/supervisors/liaisons and students may be removed from the practice setting at the request of the practice setting, until immunized or until the event is declared over.
8. Immunization information will be collected and stored in accordance with FOIP section 33 (c)

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**SPECIFICS OF THE POLICY:**

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1. Prior to entering vaccination information into HSPNet, regardless of practice site/setting, students and faculty members will be provided with the 'Identified Purposes and Handling of Personal Information in HSPnet' document (Appendix A) and must sign the HSPnet 'Consent Form for Use and Disclosure of Personal Information' (Appendix B).
  2. Personal information in HSPnet is held only during the period covered by consent, which expires automatically upon graduation or after six years (whichever is less).
  3. Upon signing the Consent Form for Use and Disclosure of Personal Information', Faculty of Health Sciences practice instructors, faculty advisors/supervisors/liaisons, and students are expected to:
    - a. Submit current immunization records to the Faculty of Health Sciences as required by or for any placement setting. This includes all primary series, adult boosters, and annual immunizations.
    - b. Inform their appropriate supervisor from the Faculty of Health Sciences if they are not able to comply with any site requirement to immunize prior to the start of the practice experience. A request for accommodation may be made at this time should the inability to immunize be related to a protected ground under any applicable legislation.
    - c. Notify their appropriate supervisor from the Faculty of Health Sciences of any changes to immunization status.
  4. To ensure privacy and confidentiality when receiving and storing immunization records, the Faculty of Health Sciences will store individuals' information in HSPNet, accessible only by the appropriate employees of the University for administering this immunization policy. If a student and/or faculty member object to having their immunization information entered into HSPNet, their information will be entered into a spreadsheet which will be housed in a university password protected computer accessible only to appropriate employees of the University for administering and tracking immunizations in the faculty.
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**APPENDIX:**

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HSPNet Consent Form

HSPNet Personal Information

**RELATED POLICIES/ASSOCIATED GUIDELINES:**

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AHS Standard for Immunization of Post-Secondary Health Care Students

Recommended Immunizations for Health Care Students:

<https://www.albertahealthservices.ca/assets/info/hp/cdc/if-hp-cdc-ipsm-imm-recomm-hcs-high-risk-occ-prg-appdx-a-08-302.pdf>

**REFERENCES:**

Public Health Agency of Canada. (2020). *Canadian Immunization Guide*.

<https://www.canada.ca/en/public-health/services/canadian-immunization-guide.html>

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Revised By/date:	Approved by/date:

## Background

The Health Sciences Placement Network (HSPnet) is a secure web-based system that is used by several provinces in Canada. The HSPnet system contains information about students in clinical placements within health agencies and other placement sites. Students authorize their educational program to use and disclose their Personal Information (name, student profile) and to use (but not disclose) their Personal Health Information via HSPnet for the purpose of locating and coordinating placements as required for their educational program. This document provides a summary of the national HSPnet Policies relating to the protection of student information within HSPnet. The full Policies can be viewed on the HSPnet website at [www.hspcanada.net](http://www.hspcanada.net).

## Collection, Use, and Disclosure of Personal Information and Personal Health Information in HSPnet

HSPnet policies ensure that Personal Information and Personal Health Information in HSPnet:

- Are collected, used, and disclosed only for purposes consistent with identifying and coordinating a student's clinical placements;
- Cannot be used or disclosed without the consent of the student whose Personal Information or Personal Health Information is to be collected; and
- Are used by or disclosed on need-to-know basis only, and accessed by those involved in student placements from an educational program or placement site. Personal Health Information is not disclosed to users outside of the student's educational program.

Personal Information Collected <i>May include any or all of:</i>	Uses of Personal Information <i>BY authorized users in the student's educational program</i>	Disclosure of Personal Information <i>TO authorized users at the placement site</i>
<ul style="list-style-type: none"> <li>• Student name</li> <li>• Student home address, phone numbers, email addresses</li> <li>• Student number</li> <li>• Student photograph</li> <li>• Placement Preferences (1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> choices if offered)</li> <li>• Student gender</li> <li>• Student certification ID with registering body for their discipline (e.g. RN Association, College of Physicians and Surgeons)</li> <li>• Date of Birth: DD/MM (excludes year)</li> </ul>	<ul style="list-style-type: none"> <li>• To contact students regarding placement needs or status, or regarding urgent issues such as labour disruption at the placement destination</li> <li>• To generate class placement lists, confirmation notices and schedules</li> <li>• To maintain a student history of placements</li> </ul>	<p><b>Student name</b> is disclosed after a placement is accepted by the site and confirmed by the educational program, to facilitate arrangements (such as orientation and preceptor assignment) and as a record of placements. Name may be disclosed prior to acceptance if the site has a reasonable justification (e.g. to arrange a student interview).</p> <p><b>Student email address</b> (issued by the educational program) may be released to support administration of computer access at the site.</p> <p><b>Student certification ID</b> may be released to sites if needed to coordinate placement arrangements such as computer access.</p> <p><b>Student gender</b> may be disclosed in the following limited situations:</p> <ul style="list-style-type: none"> <li>• For allocation of change rooms and lockers at the site</li> <li>• For matching the gender of the student and supervisor (e.g. for homecare visits where the client <b>may</b> specify a preference)</li> </ul> <p><b>Date of Birth (DD/MM)</b> may be released to sites if needed to coordinate placement arrangements such as computer access.</p>

Student prerequisite status as required by placement sites (e.g. criminal records check, CPR or other certifications)	To track student compliance with each site's published requirements for criminal records check, CPR certification, etc.	Not disclosed
Student profile of educational or work history relevant to placement requests	To facilitate a good fit between the student and the placement Site, learning experiences offered, and supervisor/preceptor to be assigned.	
<b>Personal Health Information Collected</b> <i>May include any or all of:</i>	<b>Uses of Personal Health Information</b> <i>BY authorized users in the student's educational program</i>	<b>Disclosure of Personal Health Information</b> <i>TO authorized users at the placement site</i>
Status of compliance with site requirements for safety and/or infection control: <ul style="list-style-type: none"> <li>Information on a student's immunity or immunization status for vaccine-preventable diseases such as Varicella, Diphtheria/Tetanus, Influenza, and Measles/Mumps or Rubella</li> <li>Information on Tuberculosis status including TB test and/or chest X-ray results</li> </ul>	To track status of a student's eligibility according to the requirements of placement sites	Not disclosed

## Safeguards

- The accuracy and completeness of personal information within HSPnet is maintained through the use of system tools such as mandatory fields and formatting rules, and through periodic reviews of data quality to identify the need for interventions such as user training or system modifications.
- HSPnet data is physically and logically secured in accordance with industry standards and best practices, including enforcement of strict rules for physical security and backups, password protection at all points of access, and use of anti-virus software, firewall protection, and data encryption.
- Periodic audits of HSPnet transactions are carried out to ensure there are no problems and/or gaps in the user interface that might permit inappropriate access to or update of data.
- Personal information on each student, along with their placement history, is retained until the student's completion of or withdrawal from the educational program as recorded on their HSPnet profile, or after the consent expiry period of six years, whichever occurs first. A copy of their Personal Information is available to a student upon request to their jurisdiction's Privacy Officer or the national HSPnet Privacy Officer.

## Openness, Access, and Challenging Compliance

- An individual can access their own information as well as a complete description of the type of Personal Information or Personal Health Information used/disclosed and the purposes for using or disclosing the information. Such requests can be made in writing by the student to the national HSPnet Privacy Officer and/or to the local Privacy Officer within the student's jurisdiction (contact information for each province or jurisdiction is available on the HSPnet website at <https://hsppcanada.net/privacy-officers/>).
- An individual may request changes to their Personal Information or Personal Health Information contained in HSPnet, or may register a complaint or challenge regarding the handling of their information in HSPnet, by submitting a request in writing to the national HSPnet Privacy Officer or local Privacy Officer within their jurisdiction.

## Consent Form for Use and Disclosure of Student Information

Student Number: \_\_\_\_\_ Educational Program: \_\_\_\_\_

First Name: \_\_\_\_\_ Middle Initial: \_\_\_\_\_ Last Name: \_\_\_\_\_

### 1. Permission to Use and Disclose Your Student Related Personal Information and Personal Health Information

By signing this consent, you authorize your educational Program \_\_\_\_\_ to:

- Collect, use and/or disclose your personal information (name and student profile information that is under the custody and control of your Program) to authorized staff of Receiving Agencies for the purpose of locating and coordinating an appropriate placement experience (e.g. clinical practica, fieldwork, or preceptorship) as required by your educational program;
- Use your student related personal information and personal health information relating to placement prerequisites, for the purpose of tracking your compliance against Receiving Agency safety and infection control prerequisites for accepting students. Placement prerequisites that may be tracked include personal information such as CPR certification or criminal records check status, and personal health information such as immunity/immunization status of vaccine-preventable diseases. Placement prerequisite information is used only by staff involved with your educational program, and is never disclosed to users external to your educational program.
- Disclose your personal information to the owner and administrator of the HSPnet system, namely Provincial Health Services Authority British Columbia (PHSA), to allow PHSA to indirectly collect your personal information to provide HSPnet student placement services.

### 2. Consent Period

This consent is effective immediately and shall remain valid for up to six years, or shall be voided upon your completion of the Program, your formal withdrawal from the Program, or upon written request as described below.

### 3. Your Rights With Respect to This Consent

- 3.1 Right to Refuse Consent** - You have the right to refuse to sign this consent, and if you refuse your placement will be processed manually at the earliest convenience of the Program and Receiving Agency.
- 3.2 Right to Review Privacy & Security Policies** - A copy of the document entitled *Identified Purposes and Handling of Personal Information in HSPnet*, which summarizes Privacy and Security policies relating to how we may use and disclose your personal information via HSPnet, is distributed with this Consent Form. You may wish to review the complete Privacy and Security Policies for HSPnet before signing this consent. The Privacy and Security Policies may be amended from time to time, and you may obtain an updated copy by contacting [privacy@hspcanada.net](mailto:privacy@hspcanada.net).
- 3.3 Right to Request Restrictions on Use/Disclosure** – You have the right to request that we restrict how we use and/or disclose your personal information or personal health information via HSPnet for the purpose of locating and coordinating a suitable placement experience. Such requests must be made in writing to the placement coordinator for your Program. If we agree to a restriction you have requested, we must restrict our use and/or disclosure of your personal information in the manner described in your request. If this restriction precludes our ability to coordinate your placement via HSPnet, then your placement will be processed manually at the earliest convenience of the placement coordinator and receiving agency.
- 3.4 Right to Revoke Consent** - You have the right to revoke this consent at any time. Your revocation of this consent must be in writing to the placement coordinator for your Program. Note that your revocation of this consent, or the voiding of this consent upon your completion or withdrawal from the Program, would not be retroactive and would not affect uses or disclosures we have already made according to your prior consent.
- 3.5 Right to Receive a Copy of This Consent Form** - You may request a copy of your signed consent form.

Collection of your personal information is done under the authority of the privacy legislation that applies to educational institutions in your province. For more information visit [www.hspcanada.net/privacy/index.asp](http://www.hspcanada.net/privacy/index.asp).

***I hereby authorize my educational Program to use and/or disclose my personal information via HSPnet for the purpose of locating and coordinating appropriate student placement(s) as required by the curriculum.***

Signature of Student \_\_\_\_\_

Date \_\_\_\_\_