

Updated March 15, 2010

## Policy Application Guide:

### Policy 3.2 - Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure

#### Introduction

This guide includes the following information and documents:

Section	Document Name
Background and Recommended Policy Application	
Workflow Diagram	<i>Consent Implementation Options</i>

#### Background

HSPnet Policy 3.2 *Identified Purposes and Ensuring Consent for Data Collection, Use and Disclosure* sets a high standard for privacy protection by requiring active consent from students for the use and disclosure of their personal information. Compliance with this policy requires an educational Program to collect a signed consent form from students, through an informed consent process that is supported by a handout describing the use and handling of student information in HSPnet.

This document outlines a process for implementing Policy 3.2, including both a **long term** approach (whereby all new students provide consent prior to their entry into HSPnet) and an **interim** approach to support a Program's use of HSPnet during the transition period of implementing a long term consent process.

#### Recommended Policy Application

1. During HSPnet implementation planning, educational Programs should develop a mechanism within their admission or registration process for distributing the HSPnet consent form and handout to all new applicants or registrants. The **long term** objective of this mechanism should be to ensure that HSPnet consent is obtained as an integral part of documentation collected for all new (first year) students, thereby over time replacing the need for interim mechanisms as outlined below.
2. As an **interim** approach during the transition period (before all new students can sign HSPnet consent forms), a Program may elect to enter student information into HSPnet if they determine that existing consent/notification processes are adequate to cover uses/disclosures of student information via HSPnet (i.e. for the purpose of locating and coordinating an appropriate practice education experience). Examples of existing consent/notification processes include:

- Other consent form whereby students authorize the educational institution and/or specific Program to release their information to placement sites (sometimes worded as “prospective employers”);
  - General consent form of the institution or Program on release of student information for related educational purposes;
  - Notification received by all students in the school calendar or other documentation, on the use/disclosure of their personal information;
  - Online processes for notifying students and/or obtaining consent.
3. Even if existing consent/notification processes are determined to be adequate during the transition period, the Program should notify previously admitted students about the use of HSP<sub>net</sub> for student placements and should make reasonable efforts to collect signed HSP<sub>net</sub> consent forms within the months immediately following HSP<sub>net</sub> implementation. Such efforts could include:
- Distribution and collection of HSP<sub>net</sub> forms/handouts during class (if instructors are involved in this process, they should receive the handout entitled *Guide for Instructors of Programs Using HSP<sub>net</sub>* to support their role in answering student questions and/or directing them to other resources);
  - Distribution of the HSP<sub>net</sub> form/handout as an email attachment, with instructions for fax/mail return of signed forms to the educational program.
4. As outlined in Policy 3.2, educational Programs must document cases where a student refuses their consent and follow the procedure for removing the student’s record from HSP<sub>net</sub> or limiting information that is disclosed.

For more information, contact your province’s HSP<sub>net</sub> Privacy Officer (visit the website at [www.hspscanada.net/privacy/index.asp](http://www.hspscanada.net/privacy/index.asp)) or contact [privacy@hspscanada.net](mailto:privacy@hspscanada.net).