

CPD POLICY 1.4

PRIVACY & CONFIDENTIALITY

Approved by: CPD Advisory Committee

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I. PURPOSE

The Continuing Professional Development (CPD) Office at the Schulich School of Medicine & Dentistry is committed to protecting the privacy of individuals whose personal information is collected and to maintaining the confidentiality of information entrusted to the Office in the course of its operations.

This policy establishes the principles governing the collection, use, disclosure, storage and protection of information obtained through:

- accreditation services;
- registration for CPD programs;
- payment processing;
- program evaluation;
- committee and peer review processes; and
- other administrative activities of the CPD Office.

II. SCOPE

This policy applies to:

- physicians
- dentists
- other health professionals
- faculty members
- speakers
- planning committee members
- accreditation reviewers
- learners
- staff
- volunteers
- any individual whose information is collected or maintained by the CPD Office.

III. DEFINITIONS

Privacy

Privacy refers to an individual's right to control the collection, use and disclosure of their personal information.

Confidentiality

Confidentiality refers to the obligation of the CPD Office to protect information entrusted to it against unauthorized access, use or disclosure.

IV. LEGISLATIVE AND UNIVERSITY FRAMEWORK

The CPD Office manages personal information in accordance with:

- Ontario's Freedom of Information and Protection of Privacy Act (FIPPA)
- applicable University policies governing information security, records management and privacy
- requirements established by the Committee on Accreditation of Continuing Medical Education (CACME). (Western University)

Current Western University privacy resources include:

- Western University Information and Privacy Office
- Western University Privacy Documents and Guidelines

Where University policies are updated, those policies supersede this document.

V. COLLECTION OF PERSONAL INFORMATION

The CPD Office collects only the personal information necessary to administer its programs and services.

Examples include:

- name
- professional designation
- contact information
- institutional affiliation
- dietary or accessibility requirements
- attendance records
- educational credits
- payment information
- accreditation application materials
- evaluation responses.

Information is collected only for legitimate administrative, educational or accreditation purposes.

VI. USE OF PERSONAL INFORMATION

Personal information may be used to:

- administer registration;
- process payments;
- communicate with participants before and after educational activities;

- maintain attendance records;
- issue certificates;
- report continuing professional development credits to certifying bodies when authorized;
- administer accreditation services;
- evaluate educational programs;
- improve educational programming;
- meet legal, financial and accreditation requirements.

Personal information will not be used for unrelated purposes without consent unless authorized by law.

VII. DISCLOSURE OF PERSONAL INFORMATION

Personal information will not normally be disclosed outside the University except:

- where required by law;
- where disclosure has been authorized by the individual;
- where necessary to administer accredited continuing education credits;
- where required for financial processing;
- where required to satisfy accreditation requirements.

The CPD Office does not sell or distribute participant information for commercial purposes.

VIII. CONFIDENTIALITY

All CPD staff, reviewers, committee members and individuals participating in accreditation activities are expected to maintain the confidentiality of information obtained through their roles.

Confidential information includes, but is not limited to:

- accreditation submissions;
- peer review reports;
- committee deliberations;
- conflict of interest declarations;
- program evaluations containing identifiable information;
- participant records;
- payment information.

Individuals with access to confidential information shall:

- use the information only for authorized purposes;
- access only information required for their responsibilities;
- protect electronic and paper records from unauthorized access;
- refrain from discussing confidential information outside authorized processes;
- immediately report any suspected privacy breach.

IX. INFORMATION SECURITY

The CPD Office employs administrative, physical and technical safeguards appropriate to the sensitivity of the information collected.

Examples include:

- password-protected systems;
- role-based access;
- secure University-approved electronic storage;
- secure payment processing systems.

X. PAYMENT INFORMATION

Payment information is processed through University-approved payment systems.

The CPD Office does not retain complete credit card information following payment processing.

Financial records are retained in accordance with University financial policies.

XI. ACCREDITATION RECORDS

Accreditation applications frequently contain confidential educational planning documents.

These materials:

- are used solely for accreditation purposes;
- are accessible only to individuals involved in the accreditation process;
- are retained in accordance with University records management requirements;
- are not disclosed outside the accreditation process except where required by law.

XII. PROGRAM EVALUATION DATA

Evaluation information is used to improve educational quality and to satisfy accreditation requirements.

Whenever possible, evaluation data will be reported in aggregate form.

Individual comments will not be attributed to identifiable participants unless permission has been provided or disclosure is required by law.

XIII. RETENTION AND DISPOSAL

Records are retained in accordance with applicable University records retention schedules and legal requirements.

When records are no longer required, they are securely destroyed or permanently deleted using approved University procedures.

XIV. ACCESS AND CORRECTION

Individuals may request access to their own personal information or request correction of inaccurate information, subject to applicable legislation.

Requests should be directed to:

Continuing Professional Development
Schulich School of Medicine & Dentistry
Western University

Questions regarding privacy may also be directed to the University's Information and Privacy Office.