

# Privacy Policy

Effective/Updated: October 20, 2025

## INTRODUCTION

The College of Licensed Practical Nurses and Health Care Aides of Alberta (CLHA) is committed to safeguarding all personal information that is within its custody or control. All personal information is collected, used, and disclosed by the CLHA in accordance with the *Personal Information Protection Act* (PIPA) and other applicable laws.

This Privacy Policy describes how the CLHA collects, uses, and discloses the personal information of applicants, registrants, the general public, users of the CLHA website, and other persons.

## Definition of Personal Information

Personal information is information that identifies an individual. It includes information such as gender, age, date of birth, home address, home phone number, home email address, educational background, work experience, and opinions or evaluations about an individual.

## Type of Personal Information Collected by the CLHA

The CLHA collects personal information required to carry out its functions as a regulatory body under the *Health Professions Act* (HPA), the regulations of the HPA, and its Bylaws.

Collection of personal information takes place upon initial registration, renewal, and other regulatory processes including conduct proceedings under the HPA. Examples of personal information that the CLHA may collect about applicants or registrants include:

- Demographic information, including legal name, date of birth, and sex/gender.
- Personal contact information, including home address, email address, and telephone number.
- Examination information relating to the Canadian Practical Nurse Registration Exam (CPRNE), including modality of exam, language preferences, writing attempts, and accommodations requested.
- Information submitted when applying for a practice permit with the CLHA or renewal of registration, such as written references, criminal record history, educational history, and examination results.
- Practice permit information, such as license number and status.
- Employment information and history.
- Financial information, such as banking details.

- Information received and obtained as a result of a complaint, investigation, or disciplinary process.
- Any other personal information relevant to inquiries, application, registration, renewal, complaints, discipline, or other regulatory matters for which the CLHA is responsible.

The above personal information may be collected by the CLHA relating to registrants in jurisdictions outside of Alberta where required by the CLHA to carry out its regulatory functions. Such personal information will be collected either from the nursing regulatory body having jurisdiction over the registrant or from a Canada-wide database of nursing registrant information called Nursys in Canada ("Nursys"). Note that Nursys also provides for the exchange of limited nursing registrant information with certain United States (US) nursing regulatory bodies. For more information on Nursys, see the "***Use and Disclosure of Personal Information***" section below.

Examples of personal information that the CLHA may collect about a member of the public that contacts the CLHA include:

- Basic demographic information, including legal name.
- Personal contact information, including email address and telephone number.

When the communication is related to a complaint, the CLHA will also collect information relating to the details of the complaint. In the event of a complaint, the demographic information and personal contact information that the CLHA collects may include more detail than required for a general inquiry.

The CLHA may automatically collect certain types of information from a person when they visit the CLHA website, including: Google Analytics data, page(s) visited, time spent on page(s), time zone, web browser information, country of origin, click-stream data, IP address, internet service provider, browser, the date and time of visit, the documents downloaded, search activity, and referring URL.

## **Collection of Personal Information**

The CLHA will usually collect personal information directly from and with the consent of the individual to whom the personal information relates. In certain circumstances, the CLHA will collect personal information from third parties with consent or if authorized by law. For example:

- Individuals who wish to be registered may provide the names of references. Letters of reference are collected from these individuals.
- The CLHA collects CPNRE results directly from the CPNRE service provider.
- The CLHA collects personal information from third parties if there is a complaint made against a registrant. In such circumstances, the CLHA exercises its authority under the HPA to collect information from individuals such as the complainant or potential witnesses.

- The CLHA collects personal information from other nursing regulatory bodies for application, renewal, or disciplinary purposes where the applicant was previously registered in another jurisdiction. Such personal information will be collected either from the nursing regulatory body having jurisdiction over the registrant or from Nursys.

## **Use and Disclosure of Personal Information**

The CLHA uses and discloses personal information to fulfill its mandate under the HPA, regulations, and other legislative instruments. It is primarily the CLHA's employees or committee members who will have access to, use, and disclose the personal information collected by the CLHA.

The CLHA will use personal information with the consent of the individual to whom the information belongs unless otherwise permitted by law. Examples of how personal information is used include:

- To assess whether applicants meet the initial requirements for registration with the CLHA.
- To enable applicants to take the CPNRE and to evaluate the results of the CPNRE.
- To complete entries in the CLHA's Public Registry of LPNs.
- To assess whether applicants are eligible to have their practice permit renewed or reinstated.
- To communicate with registrants about registration, discipline, or other matters relating to the regulation of the profession.
- To provide information, newsletters, and notices to registrants.
- To facilitate the payment of fees.
- To facilitate complaints, investigations, and disciplinary proceedings.
- To carry out the CLHA's regulatory duties under the HPA regarding inspections and reviews.
- To respond to general inquiries, whether from registrants or from members of the public.
- To participate in Nursys.

The CLHA is required by the HPA to maintain a public register of its registrants. Therefore, personal information of registrants is disclosed to the public through the public register. In addition to demographic and practice permit information, the public register may disclose certain disciplinary information.

External consultants or contractors may have access to personal information if access is necessary for the performance of their duties. For example, the CLHA's accountants may have access to information about registrants when they conduct their annual audit. The CLHA's contracted CPNRE services provider will have access to certain personal information required for applicants to take the CPNRE. In addition, information technology consultants may have

access to personal information from time to time. Consultants or contractors are contractually required to safeguard the confidentiality of the personal information that they access.

The CLHA contracts with service providers outside of Canada to provide certain services on its behalf. These service providers are located in the US and Germany, and they provide email services, conference services, educational registration services, and survey services. In addition, the CPNRE service provider stores most applicant personal information in Canada, but certain personal information is temporarily transferred to its US-based affiliate. When the CLHA uses a service provider outside of Canada, the CLHA ensures that the relevant contract with that service provider requires them to safeguard any personal information in a manner consistent with this Privacy Policy. For further information regarding storage of personal information outside of Canada or regarding the CLHA's policies and practices regarding storage of information outside of Canada, please contact the CLHA's Privacy Officer whose contact information is listed at the end of this Privacy Policy.

In some instances, the CLHA will be required to disclose information to third parties in a manner consistent with the uses described above. For example, the CLHA may have to verify employment information of an applicant or registrant, or it may need to share personal information of an applicant with the CPNRE service provider to enable the applicant to take the CPNRE. In these circumstances, personal information is only disclosed to a third party for the purpose of the CLHA discharging its professional regulatory responsibilities and not for any ancillary or commercial purpose.

The CLHA may disclose personal information to researchers for academic and research purposes or to non-profit institutes such as the Canadian Institute for Health Information for the purposes of contributing to a health workforce dataset across Canadian healthcare providers in support of planning, policy development, and research.

The CLHA shares the following personal information with the Canadian Nurses Protective Society for the purposes of facilitating professional liability insurance and protection: first and last name, registration number, registration class, registration date, registration expiration date, date of birth, gender, address, email address, and phone number.

The CLHA may be required to disclose personal information to a third party without first obtaining consent for disclosure where such disclosure is permitted by law. For example, disclosure of personal information to a third party may occur during the complaint, investigation, and discipline process. Other instances where the CLHA may disclose personal information without consent include:

- In response to a subpoena, warrant, or court order.
- To report fraudulent activity or other deceptive practices to another professional regulatory body or to a governmental or law enforcement agency.
- To act in urgent circumstances to protect the life, health, or security of an individual or the public.

Finally, the CLHA uploads registrant personal information to Nursys. Nursys is a secure database that is used by many nursing regulatory bodies across Canada and in the US to securely exchange nursing registrant personal information where the collection, use, or disclosure of such personal information is required by a nursing regulatory body for the purposes of carrying out their regulatory functions. Nursing regulatory bodies across Canada will be able to access the personal information of registrants located in other jurisdictions. Therefore, certain personal information of the CLHA's registrants will be shared with other nursing regulatory bodies in Canada where required.

A subset of the personal information uploaded to Nursys will also be available to nursing regulatory bodies located in the US. Of the registrant personal information uploaded to Nursys, the following information will be shared with participating regulatory bodies for the nursing profession in the US: first and last name, date of birth, province/territory, country, license number and license type.

## **PROTECTION OF PRIVACY**

The CLHA takes every reasonable effort to prevent unauthorized access, loss, misuse, disclosure, or modification of personal information. CLHA staff are trained to appreciate the importance of privacy and the confidentiality of personal information.

In addition, the security of personal information is ensured through the following measures:

- Physical safeguards of personal information, including ensuring that areas in which information is stored are secure.
- Technical safeguards, such as password protection to secure personal information that is stored in electronic form.
- Administrative safeguards, including restricting access to personal information to those with a need to access the information.
- All CLHA staff accessing personal information are trained to safeguard the information and follow strict confidentiality policies.
- The CLHA maintains information only for as long as required. Information about registrants is retained indefinitely, although some personal information may be de-identified or destroyed. "De-identified" means that personal information has been modified so that it can no longer be used, either alone or in combination with other information, to identify an individual whether directly or indirectly.

The CLHA employs secure measures when destroying personal information. This includes physical destruction of paper files containing personal information by shredding them and destruction of electronic information by permanently deleting it and by ensuring that hardware is decommissioned in accordance with commonly accepted security standards.

As effective as the CLHA's practices are, no security system is impenetrable. The CLHA cannot guarantee the security of all personal information despite the use of reasonable measures to protect the information.

If a real risk of significant harm to you arises from a security breach involving your information, the CLHA will promptly report the breach to you and to the relevant regulatory authorities.

### **Accessing and Correcting Personal Information**

Individuals have a right to access records containing their personal information. The CLHA will give individuals access to personal information subject to certain lawful restrictions (such as where information would reveal personal information about another individual or where the information is being collected for an investigation pursuant to the HPA).

In addition, affected parties may request correction of an error or omission in personal information held by the CLHA. Every reasonable effort is made to ensure that registrant information is accurate and complete. The CLHA relies on registrants to provide notification if there is a change in their personal information. If an individual requests that the CLHA correct an error or omission, the information will be corrected as soon as is reasonably possible, subject to legal limitations. The CLHA is not required to correct any professional opinions that may be formed.

All requests for access and correction must be in writing and must set out in sufficient detail the scope of the request. Requests should be delivered or mailed to the Privacy Officer. The Privacy Officer will assist individuals asking for access to or for correction of their personal information and will respond (as accurately and completely) within the time limits specified in PIPA.

### **Canada's Anti-Spam Legislation (CASL)**

The CLHA complies with CASL when commercial electronic messages are sent to individuals. Additional information about the CLHA's compliance is found in the *Anti-Spam Policy*.

## **CONCLUSION**

Documents are updated frequently. For the most current version and access to related documents and resources, please visit the Knowledge Hub on [clha.com](http://clha.com).

If after reading this document you have questions, please contact the CLHA's Professional Practice Team via [practice@clha.com](mailto:practice@clha.com) or 780-484-8886 or 1-800-661-5877 (toll free in Alberta).