

## Community Pharmacy Privacy Officer\* - Suggested Position Description

With an advanced knowledge of *The Health Information Protection Act (HIPA)*, *The Health Information Protection Regulations, 2023 (HIPR)* and the *Personal Information Protection and Electronic Documents Act (PIPEDA)*, this position advises on and coordinates compliance with this privacy legislation as it affects community pharmacy practice and the operation of the community pharmacy.

### Duties and Responsibilities

1. Become familiar with HIPA and PIPEDA and their respective regulations;
2. Be familiar with all privacy best practices and investigation reports issued by the Office of the Saskatchewan Information and Privacy Commissioner (the OIPC) and the federal Privacy Commissioner;
3. Ensure all employees and contractors of the pharmacy who have access to personal information/personal health information are trained for compliance with HIPA, PIPEDA and your pharmacy's policies and procedures and that they each have signed a pledge of confidentiality. The privacy officer should be the individual whom employees/contractors know to contact with privacy questions and report privacy incidents;
4. Ensure that personal information and personal health information in the possession or control of the pharmacy is protected with adequate administrative, technical, and physical safeguards. This would include monitoring the effectiveness of those safeguards by tracking all privacy incidents to ensure that safeguards remain effective and revising or changing those safeguards where necessary;
5. Respond to privacy incidents in a consistent and timely manner. This would include a thorough investigation of privacy incidents. Investigations should always include an analysis of applicable privacy laws and internal policies, procedures, and other safeguards;
6. Respond to privacy complaints in a consistent manner using best practices;
7. Respond to written requests for patient access to their own personal health information or personal information;
8. Respond to requests to amend records or revise errors in recorded personal health information or personal information;
9. Review contracts with third party service providers such as Information Management Service Providers (IMSPs) to ensure HIPA, HIPR and PIPEDA compliance;

10. Liaise with the OIPC or the federal Privacy Commissioner on privacy investigations;
11. Advocate for privacy within the pharmacy itself.
12. Participate in the development, implementation and maintenance of written privacy policies and procedures for the pharmacy, including record retention and destruction policies; and
13. Participate in the development, implementation and maintenance of materials intended to educate, inform, or notify the public about the pharmacy's privacy policies, procedures, and practices and to also fulfill the pharmacy's more general duties as a trustee to inform the public about the pharmacy's anticipated collection, use and disclosure of their personal health information and personal information by the pharmacy.

Acknowledgement: Office of the Information and Privacy Commissioner for Saskatchewan