

CDA Corporate Administrative Policy: Privacy and Confidentiality Protection for CPD Activities

Purpose

The Canadian Dermatology Association (CDA) is a national physician organization that provides continuing professional development (CPD) for dermatologists.

The CDA is committed to creating a welcoming and safe environment for individuals attending and participating in its CPD activities.

To ensure the privacy of these individuals and the information they provide to the CDA and/or share with individuals associated with the CPD activity are protected, the CDA has adopted the following policy to:

- Establish a framework for the management of personal and confidential information
- Identify fair play rules for individuals and businesses supporting, attending and/or participating a CDA CPD activity; and
- Provide safeguard measures for individuals and activities not addressed in current legislation.

Applicability

This policy applies to individuals associated with the development and/or delivery of a CPD activity including, but not limited to, staff, contractors, agents, patient support groups, sponsors, sponsor representatives, faculty, and CPD activity attendees.

Policy Provisions

Principles:

1. The CDA has in place a [Personal Information Protection Policy](#) that describes the policies and practices of the CDA with respect to the collection, use and disclosure of personal information provided to the CDA.
2. The CDA [Personal Information Protection Policy](#) was developed in accordance with the Personal Information Protection and Electronic Documents Act ([PIPEDA](#)) and with Canada's Anti-Spam Legislation ([CASL](#)).
3. This policy has been developed to take into account other activities associated with a CPD activity whereby an individual may be privy to personal or confidential information not protected by current legislations.

4. In instances where a provincial or territorial privacy legislation is also applicable and/or supersedes PIPEDA, this policy is to respect and apply those statutes when a CPD activity takes place in those provinces or territories.
5. This policy has been developed in accordance with the [National Standard for Support of Accredited CPD Activities](#).

Commercial Services:

6. Individuals and businesses providing commercial services for a CPD activity must have a privacy policy that can be forwarded to the CDA upon request.
7. Individuals and businesses providing services for a CPD activity must review the CDA [Personal Information Protection Policy](#) and complete the [CDA Privacy Policy Declaration and Agreement Form](#).
8. Personal and confidential information provided for the execution of services shall be held in confidence and not be further disclosed without CDA's permission.
9. Personal and confidential information provided shall be limited to a need-to-know basis and must be safely stored by recipients.
10. Personal and confidential information shall be destroyed when no longer required.
11. Failure to comply with these measures is considered a breach of the services contract.

Non-Commercial Services:

12. Individuals involved in the development and/or delivery of a CPD activity may become aware of personal and confidential information. In such instances, this information is considered privileged and cannot be further used or communicated without consent of the owner.
13. Recipients of such privileged information shall not retain any notes, documents, or recordings of this information once the CPD activity has been delivered.

Sponsor, Sponsor Representatives, Patient Support Groups:

14. Sponsors and sponsor representatives are not entitled to attendee information as a benefit of sponsorship, except for where such has been identified by the CDA and for which the CDA has obtained appropriate consent.
15. Sponsors, sponsor representatives, and patient support group representatives must not photograph, video record and/or audio record attendees or their conversations, in whole or in part, without the attendee's consent.
16. Sponsors, sponsor representatives, and patient support groups must not photograph, video record and/or audio record the works of oral and abstract presenters, in whole or in part, without the presenter's consent. These works are copyrighted and subject to reputational and financial penalties. (See [CDA Policy: Copyright Relating to CPD Activities](#))

Attendees:

17. Attendees must not photograph, video record and/or audio record the works of oral and abstract presenters, in whole or in part, without the presenter's consent. These works are copyrighted and subject to reputational and financial penalties. (See [CDA Policy: Copyright Relating to CPD Activities](#))

Accountability:

18. Failure to comply with the above provisions jeopardizes the credibility of all CDA CPD activities. CDA reserves the right to take appropriate action including barring future involvement in, or attendance at, CDA CPD activities and taking legal steps if financial and/or reputational losses are incurred.

Review

This policy shall be reviewed annually.

Approved by:
CDA Board of Directors
February 26, 2024