

AIMS PRIVACY POLICY AND STATEMENT (EMPLOYEES)

1	Purpose
	<p>Health Shared Services Saskatchewan (3sHealth), the Saskatchewan Health Authority (the SHA), and the other Saskatchewan health-care organizations (OHOs) are participating in the Administrative Information Management System (AIMS). The objective of AIMS is to modernize the human resources, financial, and other administrative systems used to support the Saskatchewan health-care system. AIMS is described in more detail below.</p> <p>The purpose of this document is to describe how 3sHealth, the SHA, and the OHOs will collect, use, disclose, and protect the personal information and personal health information of health sector employees when using AIMS. This Policy is intended to supplement the privacy policies used by 3sHealth, the SHA, and OHOs. It is only intended to deal with personal information and personal health information of employees while it is processed and stored in AIMS.</p> <p>3sHealth will be using supporting vendors to provide information management and technology services, as well as supporting business services to operate and maintain AIMS on behalf of and for the SHA and OHOs. 3sHealth will also use AIMS to process and store the personal information and personal health information for its own employees.</p>
2	Background
	<p>The privacy and security of personal information and personal health information is very important to 3sHealth, the SHA, the OHOs, and the functionality of AIMS.</p> <p>It is 3sHealth, the SHA, and the OHOs’ policy and intent to protect and respect the privacy of personal information and personal health information in accordance with applicable privacy laws. For ease of reference, the term personal information will be referred to as “PI” and personal health information will be referred to as “PHI.”</p> <p>Within AIMS, a single record is maintained for each individual employee. Where an employee is employed by multiple employers who are using AIMS, certain demographic, employment, and financial information, necessary to manage or administer the employment relationship, will be shared by multiple employers. This will also be the case where individual employees move from employer to employer within AIMS. For greater certainty, information classified as sensitive PI/PHI will not be shared between employers unless authorized by legislation or with the consent of the individual employee.</p> <p>If individual employees have concerns with the accuracy of the information stored in AIMS, it can be reviewed through the AIMS online portal. Any other concerns should be brought to the attention of your organization’s privacy officer.</p>
3	Key Principles

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WHY IS PERSONAL INFORMATION (PI)/PERSONAL HEALTH INFORMATION (PHI) COLLECTED FOR EMPLOYEES?

The PI/PHI included in AIMS is collected for the following purposes:

- To manage and administer benefits, including health and dental benefits, disability income plan benefits, and life insurance plans for employees of 3sHealth, the SHA, and the OHOs;
- To provide payroll services, including disclosures to the Canada Revenue Agency, as required by law;
- To provide consulting services, on behalf of 3sHealth, the SHA, and the OHOs, for their employees, with third party companies;
- To administer, plan, and manage the relationship between 3sHealth, the SHA, and the OHOs and their employees, including scheduling, workflows, and work processes, and to communicate with 3sHealth, the SHA, and the OHOs and their employees;
- To comply with applicable legal and regulatory requirements or to protect the legal rights and property of 3sHealth, the SHA, and the OHOs;
- To manage collective bargaining agreements, including provincial and multi-employer collective bargaining agreements;
- To otherwise manage, support, or administer the employment relationship; and
- To plan, manage, or evaluate the effectiveness or efficiency of health or social services being delivered in the Province of Saskatchewan

(collectively, the “**Authorized Purposes**”).

The type of information included in AIMS that may generally be collected from employees of 3sHealth, the SHA, and the OHOs includes, for example, name, address, contact information, social insurance number or other person identification number, immunization records, emergency contact names and contact information, and benefits information, including health information. Financial information to support direct deposit or tax reporting is also collected.

PI/PHI to be included in AIMS is not collected for any other purposes without the express consent of the individual employee to whom the information relates.

HOW IS PI/PHI COLLECTED FOR EMPLOYEES?

PI/PHI is generally collected directly from the individual to whom it relates, whether via the individual’s own interface with AIMS, e-mail, telephone, fax, or in person. PI/PHI may also be collected from third party sources or already be available in AIMS, but only where authorized by applicable laws.

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WHEN IS PI/PHI USED OR DISCLOSED FOR EMPLOYEES?

The PI/PHI included in AIMS is used and disclosed as reasonably required to facilitate the Authorized Purposes listed above or as authorized by law.

In some cases, the PI/PHI may be shared with third party service providers performing functions to AIMS, including, for example, vendors that provide information technology or management services or provide analytics or assessment services. 3sHealth will be using supporting service providers to provide information management and technology services, as well as supporting business services to operate and maintain AIMS on behalf of and for the SHA and OHOs. 3sHealth will also use AIMS to process and store the PI/PHI for its own employees.

3sHealth, the SHA, and the OHOs work together to deliver the services of AIMS. PI/PHI may be shared between these organizations to facilitate the Authorized Purposes listed above in accordance with this Policy. For example, PI/PHI may be shared where an employee works for multiple employers or where it is required to manage a provincial or multi-employer collective bargaining agreement. PI/PHI will only be shared on a need-to-know basis. For greater certainty, information classified as sensitive PI/PHI will not be shared between employers unless authorized by law or with the consent of the individual employee.

PI/PHI is disclosed to certain authorized third parties as authorized by law or the applicable collective bargaining agreement.

PI/PHI is disclosed to SAHO Inc. and the Ministry of Health as authorized by law or the applicable collective bargaining agreement. For example, aggregate employment information is provided to SAHO Inc. for the purposes of facilitating and supporting the collective bargaining process.

The PI/PHI included in AIMS is not otherwise used or disclosed without the individual employee's consent, unless otherwise authorized by law.

The PI/PHI included in AIMS is not rented, sold, or traded.

CONSENT – IS THERE A CHOICE?

The collection, use, and disclosure of an individual employee's PI/PHI in AIMS, as described in this Policy, is authorized under applicable law. It is the only way for 3sHealth, the SHA, and the OHOs to efficiently and effectively operate their business and manage and administer the employment relationship. Requests for accommodations should be made

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to your organization's Privacy Officer.

Express consent will be obtained from the individual employee where PI/PHI is being disclosed to a third party where the disclosure is not authorized by law.

Individual employees can deny or withdraw their consent to the collection, use, and disclosure of their PI/PHI at any time upon reasonable notice, subject to any legal or contractual/employment requirements as described in this Policy or stipulated by the applicable employer. If consent is denied or withdrawn, the individual may not be able to access optional services. The inclusion, processing, and storage of an individual's PI/PHI in AIMS is required if the individual is to be employed and paid by 3sHealth, the SHA, and the OHOs.

HOW IS THE SECURITY OF PI/PHI FOR EMPLOYEES PROTECTED?

There are reasonable policies, procedures, and safeguards (including physical, technological, and organizational measures) in place designed to protect the security and confidentiality of PI/PHI which is included in AIMS. 3sHealth, the SHA, and the OHOs are responsible for complying with reasonable policies, procedures, and safeguards. The written agreements in place for the AIMS Service Providers include reasonable data protection schedules and other reasonable provisions with respect to the protection of PI/PHI.

The protection of PI/PHI is of paramount concern to the functionality of AIMS, and AIMS is prepared to take appropriate and timely steps in the event of any incidents involving PI/PHI in accordance with applicable privacy laws.

Every reasonable effort is taken to ensure that PI/PHI included in AIMS is accurate and complete. This may involve requesting further information or updates from individual employees. 3sHealth, the SHA, and the OHOs rely on individual employees to notify them if there is a change to their PI/PHI that may affect the administration of services through AIMS.

PI/PHI included in AIMS is retained in accordance with applicable laws.

PI/PHI included in AIMS is disposed of or destroyed in a secure manner in accordance with applicable laws. 3sHealth, the SHA, and the OHOs will follow reasonable practices when disposing of or destroying PI/PHI.

IS ACCESS TO PI/PHI PROVIDED?

In accordance with applicable laws, 3sHealth, the SHA, and the OHOs will provide

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individual employees with access to their PI/PHI included in AIMS. All requests submitted by an individual employee for access to their PI/PHI must be made in writing. It is important to note that much of the PI/PHI stored in AIMS will be accessible to individual employees through the AIMS online portal.

If a request for access to PI/PHI is refused, the individual employee will be informed in writing of the refusal and the grounds for the refusal.

PI/PHI included in AIMS will be corrected or amended where it can be shown that the information is inaccurate or incomplete, subject to any applicable exceptions or exemptions under applicable laws.

Decisions on the access to or amendment of PI/PHI in AIMS will be made by the applicable trustee or custodian.

STORAGE AND PROCESSING

PI/PHI included in AIMS will be stored in a restricted cloud computing environment with reasonable safeguards to ensure the PI/PHI will remain stored in data centres located in Canada. Every effort is made to ensure PI/PHI included in AIMS is processed and stored in Canada; however, service providers may access and store PI/PHI outside of Canada (including in the United States of America) on a temporary basis to provide maintenance and support services. When information is temporarily accessed or stored outside of Canada, it may be subject to the laws of and be accessible by legal authorities in such other jurisdictions. 3sHealth, the SHA, and the OHOs have taken reasonable and appropriate technical, organizational, and legal steps (including appropriate contractual provisions) to secure this information, to ensure it is stored in Canada, and to encrypt the information.

CHALLENGING COMPLIANCE AND FURTHER INFORMATION

For further information about the privacy practices applicable to AIMS, to make a request for access to PI/PHI, or to exercise any other rights outlined above, please contact your organization's Privacy Officer.

If your concerns are not addressed or resolved, please contact the 3sHealth Privacy Officer by emailing informationmanagement@3sHealth.ca

If your concern is not resolved by contacting your organization's privacy officer or the 3sHealth Privacy Officer, you can contact the Office of the Saskatchewan Information and Privacy Commissioner at:

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	<p>Saskatchewan Information and Privacy Commissioner 503 – 1801 Hamilton Street Regina, SK S4P 4B4</p> <p>Telephone: 306-787-8350 Toll Free Telephone (within Saskatchewan): 1-877-748-2298 Fax: 306-798-1603 Email: webmaster@oipc.sk.ca</p>	
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9	Approval Date	<i>This policy was approved on: June 19, 2024</i>
10	Review Date	<i>This policy needs to be reviewed on: June 19, 2025</i>
11	Enquiries	Any questions or clarification required should be referred to the 3sHealth Privacy Officer at InformationManagement@3sHealth.ca
12	Policy Owner	3sHealth Privacy Officer