Institute for Safe Medication Practices Canada

Answers to Frequently Asked Questions on ISMP Canada's Privacy Practices for the General Public

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1. What is ISMP Canada?

The Institute for Safe Medication Practices Canada (ISMP Canada) is an independent, non-profit agency established to collect and analyze medication incident reports and the development of recommendations for the enhancement of patient safety. Like its sister organization, the Institute for Safe Medication Practices in the United States, ISMP Canada intends to serve as a national resource for promoting safe medication practices throughout the healthcare community in Canada.

2. What is a medication incident or error?

A medication incident or error is any preventable event that may cause or lead to inappropriate medication use or patient harm from medication, while the medication is in the control of the healthcare practitioners, patient, or consumer. Such events may be related to professional practice, healthcare products, procedures, and systems including: prescribing; order communication; product labelling, packaging and nomenclature; compounding; dispensing; distribution; administration; education; monitoring; and use.[1] Adverse medication incidents are the second most prevalent type of adverse medical event, which affected 7.5 percent of all patients admitted to hospital in 2000.[2]

3. How does ISMP Canada help prevent medication errors?

ISMP Canada is committed to the safe use of medications through improvement in drug distribution (institution and community), naming, packaging, labelling, computer program design and drug delivery system design. The Institute works collaboratively with healthcare practitioners and institutions, schools, professional organizations, the pharmaceutical industry, and regulatory and government agencies to provide education about preventable adverse drug events and their prevention.

4. What does ISMP Canada do with the information it collects?

ISMP Canada's data holdings are used to aid healthcare practitioners and institutions, the pharmaceutical industry, and government and regulatory agencies in preventing future medication incidents. For example, ISMP Canada's data holdings are used to:

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[1] National Coordinating Council for Medication Error Reporting and Prevention definition; available at: http://www.nccmerp.org/aboutMedErrors.html.

[2] Baker GR, Norton PG, Flintoft V, Blais R, Brown A, Cox J, et al. *The Canadian Adverse Events Study: the incidence of adverse events among hospital patients in Canada*. *CMAJ* 2004;170(11):1678-86. Available at: http://www.cmaj.ca/cgi/content/full/170/11/1678.

- Develop monthly medication safety alerts that describe, for example, problems with titrating drug doses or the link between first-dose delays of anticoagulants and antibiotics and patient morbidity or mortality.
- Develop monthly articles on safe medication practices for hospitals, including information on the patient's role in safe medication use and benchmarking medication incident rates.
- Understand the cost of preventable adverse drug events and make comparisons among reporting institutions to develop best practices to prevent similar medication incidents.

5. Why does ISMP Canada collect information?

ISMP Canada collects information from healthcare institutions and practitioners to achieve the following purposes:

- To make recommendations to reduce the probability that preventable adverse medication events will happen again;
- To publish and disseminate information to the healthcare community and practitioners through efficient electronic means in order to promote safe medication use and strategies for reduction of error-induced injury in Canada;
- To participate in cooperative programs with professional organizations in Canada in providing education about preventable adverse drug events and their prevention;
- To act as consultants, upon request, to institutions and other healthcare organizations on safe medication use;
- To develop educational and quality improvement assessment tools for healthcare practitioners and institutions;
- To establish and maintain a strong partnership with its sister organization, the Institute for Safe Medication Practices in the United States, and other international, national and provincial patient safety initiatives, where appropriate; and
- To provide educational programs for university and health professional constituents.

6. Where does ISMP Canada get its information?

ISMP Canada receives information voluntarily on preventable adverse drug events from individual healthcare practitioners and institutions, via telephone, email, mail, fax, a web-based reporting function, and, occasionally, and through in-person conversations.

7. Why do healthcare practitioners (nurses, family physicians, healthcare institutions, etc.) provide ISMP Canada with information on medication errors?

To reduce the likelihood of a medication error happening again, healthcare practitioners are encouraged to report medication incidents, near-incidents or hazardous conditions to ISMP Canada. These include but are not limited to administering the wrong drug, strength or dose of medications; confusion over look-alike/sound-alike drugs; incorrect route of administration; calculation or preparation incidents; misuse of medication equipment; and incidents during prescribing, transcribing, dispensing, and monitoring of medications. Monthly medication safety alerts, monthly articles on safe medication practices, and case studies are published by ISMP Canada to alert healthcare practitioners about recommendations to prevent medication incidents.

8. What types of information do healthcare practitioners share with ISMP Canada?

All information received by ISMP Canada is provided *voluntarily* by individual healthcare practitioners and institutions. ISMP Canada receives two types of information:

1. Non-identifiable information about a preventable adverse drug events, such as:
    - descriptions of the incident or preventable adverse drug reaction;
    - whether or not the incident was an actual medication accident (reached the patient) or is a potential incident that was discovered before the medication reached the patient;
    - patient outcome;
    - type and size of healthcare institution where the incident occurred (e.g., hospital, private office, retail pharmacy, drug company, long-term care facility, etc.);
    - names and dosage form, concentration or strength, and other relevant information concerning the medication involved;
    - a description of how the incident was discovered; and
    - recommendations for preventing similar incidents in the future.

2. Personal information about a preventable adverse drug event, such as:
    - specific information on the patient's medical condition and the effects of a preventable adverse drug event;
    - the types of healthcare practitioners involved in the incident;
    - institution-identifiable information; and
    - the reporter's contact information, including: name, address and place of work, which is provided *voluntarily* to ISMP Canada. If ISMP Canada receives this information, it may be invited to work jointly with reporting healthcare practitioners and institutions to investigate a specific incident (called a "root cause analysis") and provide recommendations for avoiding similar incidents in the future.

9. Does ISMP Canada collect patient identifiable information related to preventable adverse drug events, such as name, address, or postal code?

No – Never. ISMP Canada requests that all identifying information about patients be removed *prior* to it being shared with ISMP Canada. Individual healthcare practitioners may choose to provide their contact information for the purpose of allowing ISMP Canada to carry out follow-up investigations or to clarify information relating to a specific preventable adverse drug event reported by the individual healthcare practitioner or institution.

In some cases, the circumstances of a specific medication error are so unique that it may be possible for ISMP Canada to infer the identity of the institution involved in the incident. ISMP Canada has a privacy policy in place to ensure such information is not used without the consent of the institution in these cases. Finally, there may be some incidents when a patient chooses to "go public" with a medication error they experienced – or that a family member experienced. In such cases, ISMP Canada may learn the identity of a patient involved in a specific preventable adverse drug event through the media. This information would then be considered part of the "public domain". However, ISMP will never publish patient names in its reports or refer to patients by names in its meetings, press conferences or other publications even when a patient's name is in the public domain.

10. How does ISMP Canada protect information that someone might be able to use to identify an individual?

ISMP Canada only discloses or publishes aggregated (anonymously grouped together or summarized) information in a manner designed to ensure that individuals and institutions cannot be identified. ISMP Canada aggregates information to levels that do not permit individuals and institutions to be identified, which requires a minimum of three observations per data cell or element. In cases where observations are less than three per data cell or element, ISMP Canada will obtain permission from the reporting healthcare institution or practitioner before disclosing or publishing information on the incident.

11. What about healthcare practitioners and other individuals who report medication incidents? Do you collect their contact information?

Yes, in some cases ISMP Canada may receive and use a reporter's (the person who reports a medication incident) contact information (e.g., name, address, place of work, e-mail address and telephone number) for the purpose of follow-up interviews in the course of an investigation or for the clarification of data relating to a specific preventable adverse drug event. However, the provision of contact information is purely *voluntary* and contact information is not retained by ISMP Canada. Healthcare practitioners and institutions can also submit reports and associated materials anonymously.

12. What information do you collect about patients from their doctor's office?

The doctor or other healthcare practitioners involved in a patient's care may make a medication error (or near error), which they then may report to ISMP Canada. ISMP Canada will receive whatever information is *voluntarily* provided by a patient's doctor or other healthcare practitioners and, upon request, use it to conduct an investigation and make recommendations to avoid such incidents from happening again in the future. ISMP Canada will *never* collect a patient's name from their doctor or other healthcare practitioners.

13. What if I do not want my healthcare practitioner to disclose information about a preventable adverse drug event to ISMP Canada?

Since ISMP Canada only receives anonymous information about patients, it cannot remove information on medication errors from its data holdings at the request of individual patients. However, if you are concerned about your doctor or other healthcare practitioners reporting future information about medication errors to ISMP Canada, contact your doctor or healthcare institution directly.

14. Can I see the information ISMP Canada has about me or relating to a specific preventable adverse drug event I experienced?

ISMP Canada does not retain personal information on preventable adverse drug events. As such, individuals requesting information about a specific medication incident should contact the healthcare institution or practitioner involved in the medication incident. Since ISMP Canada does not retain the names of reporting healthcare practitioners or institutions, the Institute cannot confirm whether a specific individual or institution has reported the particular preventable adverse drug event you experienced.

15. How does ISMP Canada protect my information?

ISMP Canada has implemented a number of safeguards to protect the information with which it is entrusted. These safeguards protect information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

ISMP Canada has three categories of safeguards in place; these categories are:

- *Physical measures*, for example, locked filing cabinets, and restricted access to offices and other areas where ISMP Canada's data holdings are stored;

- *Administrative measures*, for example, the ISMP Canada Privacy Policy, based on Schedule 1 of the *Personal Information Protection and Electronic Documents*

Act, staff training on privacy, signing of confidentiality agreements, and limiting access to information on a "need-to-know" basis; and

- *Technical measures*, for example, the use of passwords, encryption, firewalls, audits, and other technical security safeguards to minimize the risk of unauthorized individuals accessing ISMP Canada's data holdings.

16. Does ISMP Canada sell the information it receives?

No – never.

17. How long does ISMP Canada keep information?

ISMP Canada does not keep personal information (e.g., information that may identify an individual healthcare practitioner or institution) after it has been used for the purpose for which it was provided (e.g., to conduct an investigation and make recommendations to avoid similar medication incidents from happening again in the future). All information is destroyed in a secure and confidential manner.

18. If I have questions about ISMP Canada's handling of my information, whom can I ask?

For any questions or concerns please contact the ISMP Canada Privacy Officer at:

Mail: Privacy Officer
ISMP Canada
4711 Yonge Street, Suite 501
Toronto, Ontario
Canada M2N 6K8
Telephone**:** (416) 733-3131
Fax: (416) 733-1146
E-mail: privacy@ismp-canada.org