



## Stakeholder Relations and Communications Policy

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# NOVA SCOTIA PRESCRIPTION MONITORING PROGRAM

## SECTION I

### STAKEHOLDER RELATIONS AND COMMUNICATIONS POLICY

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#### 1. Policy Objective

The purpose of this policy is to establish minimum standards for how the Board and the Program will communicate openly about our plans, performance, values and services to its stakeholders.

#### 2. Policy Statement

The development and maintenance of strong relationships and effective two-way communication with our stakeholders are essential to the achievement of the Program's objects. A well-defined structure and systematic processes will provide an important foundation for these strong relationships and effective two-way communication with our stakeholders.

##### 2.1 Responsibilities

The Administrator will review these communications policies at least once per year and any recommended changes will be brought to the Board for approval prior to implementation. The Administrator will also develop an annual stakeholder relations and communications plan as part of the annual business plan for the Program.

The Board will confirm or amend these communications policies at least once per year. The Board will review and approve an annual stakeholder relations and communications plan as part of its consideration and approval of an annual business plan for the Program.

##### 2.2 Spokespersons

The Board Chair is the principal spokesperson for the Board. The Administrator is the principal spokesperson for the administration of the Program.

If a Director is contacted for comments on the Board or the Program or to represent it, he or she will inform the Board Chair before taking action. Directors will only be involved in external communications with the approval of the Board Chair.

##### 2.3 Annual Report

The Board will submit to the Minister an annual report on the activities of the Board and the Minister will table that report before the Assembly. As required under the Act, the annual report will set out the reasons why a drug has been added to or removed from the Program.

## **2.4 Other Reports**

The Board will, in the form and with the content required by the Minister, provide to the Minister

- (a) through the Administrator, annual financial statements; and
- (b) such other reports as are required by the Minister.

## **2.5 Distribution of Reports**

Copies of annual reports and annual financial statements will be distributed to a Board approved distribution list and to any stakeholder upon request.

Annual reports and financial statements will be distributed to stakeholders, the public and the media free of charge.

## **2.6 Regular Stakeholder Consultations**

On an annual basis, the Board will develop a plan to hold meetings with significant stakeholder representatives. These may be done in conjunction with regularly scheduled Board meetings. The purpose of the stakeholder consultations is to understand the views and concerns of stakeholders relating to the objects of the Program and to seek the input on how the Program can be strengthened in the future. A related purpose is to respond to any questions that the stakeholders may have about the Program.

## **2.7 Government Relations**

The Board will strive to promote effective two-way communication between itself and Government, through the responsible Minister. In addition to an annual meeting to review the Program's Business Plan, other briefings per year will be arranged between the Minister, the Board Chair and the Administrator to review the status of the Program, highlight trends of significance and to respond to any questions the Minister may have. Through the Board Chair, ongoing information will be sought from the Minister regarding public policy priorities of relevance to the Program.

## **2.10 Stakeholder Enquiries**

Enquiries from the Minister or other senior government officials are generally received by the Board Chair or the Administrator and will be dealt with by the Board Chair or the Administrator, in accordance with their roles as Spokespersons under Section 2.2 of this Policy.

Other enquiries from stakeholders generally or the media will be directed to the Administrator who will evaluate the request, respond directly or through a designate when appropriate or gather the necessary background information and direct the request to the Board Chair.

## **2.11 Privacy Enquiries**

Enquiries from individuals regarding any of their personal information held by the Program or Board will be dealt with in accordance with the Board's Privacy Policy.

## **2.12 Media Enquiries**

General enquiries from the media will be directed to the Administrator who will evaluate the request, respond directly or gather the necessary background information and direct the request to the Board Chair, as appropriate.

Background briefings and interviews are subject to prior approval by the Board Chair and will be developed by the Administrator.

Interviews and background briefings will be on record.

## **2.13 Speeches and Presentations**

Prior to accepting invitations for speeches and presentations on behalf of the Program, Directors will obtain the approval of the Board Chair. A standard form presentation will be developed by the Administrator to ensure consistency of messaging.

## **2.14 Web Site**

The Program's website will be developed as a means of public, media and stakeholder communications.

Only published material and information previously approved by the Board will be posted to the website by the Administrator.

Maintaining the timeliness and accuracy of the website will be the responsibility of the Administrator.

## **2.15 Routine Reporting**

The Board Chair and/or the Administrator, as appropriate, will inform the Board of communications and stakeholder and media relations activities at regularly scheduled Board meetings.

## **2.16 Alternates**

If the position of Board Chair is vacant, the communications responsibilities of the Board Chair will be fulfilled by the Vice-Chair or another individual so authorized by the Board.

## **3. Legislative Framework**

The Prescription Monitoring Act provides that:

- Licensing authorities for physicians and surgeons, dentists and pharmacists be represented on the Board (s. 7)
- The Administrator provide information, professional consultation and assistance to licensing authorities, prescribers and pharmacists about the prescribing and dispensing of monitored drugs as requested by the licensing authorities (s. 12(2)(d) and (g))
- The Administrator must monitor the use of monitored drugs by residents and report inappropriate use to an appropriate law enforcement authority, an appropriate licensing authority, or a pharmacist or prescriber (s. 12(2)(e))
- The Administrator must educate prescribers and pharmacists about appropriate prescribing and dispensing of monitored drugs (s. 12(2)(h))
- The Administrator must respond to inquiries from the public with respect to the Program (s. 12(2)(i))
- The Administrator must report to the Board, the Minister and licensing authorities on new and emerging patterns for monitored drugs in all or part of the Province and other jurisdictions as those patterns become known to the Administrator (s. 12(2)(j))

- The Board is required to submit an annual report and such other reports as required by the Minister (including annual financial statements, through the Administrator) (s. 14)
- The Minister is required to table the Board's annual report before the Assembly (s. 14)
- Upon request of the Administrator, prescribers, pharmacists or any other body or person shall provide to the Administrator any information, including medical records, the Administrator reasonably requires to achieve the objects of the Program (s. 18)
- Notwithstanding the Freedom of Information and Protection of Privacy Act, the Administrator may release (a) information with respect to monitored drugs, (b) personal information relating to a resident who has a prescription for monitored drugs, to a prescriber, a pharmacist, a licensing authority or other body or person as is reasonable to achieve the objects of the Program (s. 20)
- Any data provided to the Minister, the Governor in Council or the public with respect to the Program shall be non-nominal data (s. 22 and s. 2(j))
- A resident may have access to the resident's own personal information with respect to the Program (s. 22(2))
- The Administrator can initiate law enforcement proceedings and can file a complaint with a licensing authority, providing the latter with all relevant information upon which the complaint is based (s. 23)
- The Governor in Council may make regulations relating to the sharing of information relating to the Program (s. 27 (j) and (k))

#### **4. Principles**

The following principles will guide the Program's stakeholder relations and communications:

- (a) The requirements of the Act will be respected
- (b) We will strive to be accessible and responsive when communicating with our stakeholders, the public and Government
- (c) Annual goals will be established for the ongoing improvement of our stakeholder relations and communications; an annual plan for achieving these goals will be considered and approved by the Board as part of the annual business planning process
- (d) We will strive to be as transparent as possible about our Program and its processes, while balancing this principle with the privacy standards defined in our Privacy Policy.

#### **5. Definitions**

In this policy:

- (a) "Administrator" means the agency or person designated by the Minister to administer the Program, and for the purposes of this policy includes the Manager appointed by the Administrator or any other person employed by the Administrator.
- (b) "Board" means the Nova Scotia Prescription Monitoring Board established by the Prescription Monitoring Act.
- (c) "Manager" means the individual appointed as the Manager by the Administrator pursuant to s. 12(4) of the Prescription Monitoring Act.
- (d) "Minister" means the Minister of Health.
- (e) "Program" means the Prescription Monitoring Program established by the Board.

## **6. Scope**

This Policy applies to:

- (a) the Board,
- (b) the Administrator, and
- (c) the Program.

## **7. Accountability**

The Administrator and the Board Chair have responsibility for the ongoing monitoring and enforcement of this Policy. They will report on compliance with this policy to the Board at least once per year.

## **8. Challenging Compliance**

Any challenge to the Program's compliance with this policy shall be provided in writing to the Manager.