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MINISTRY OF HEALTH

PHARMACY AND POISONS BOARD

GUIDELINE ON INFORMATION SHARING

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LIST OF ABBREVIATIONS

AU:	African Union
CEO:	Chief Executive Officer
CCD:	Corporate Communication Division
CSD:	Corporate Services Directorate
EAC:	East African Community
HPTs:	Health Products and Technologies
ICH:	International Council for Harmonisation
IGAD:	Intergovernmental Authority for Development
PIC/S:	Pharmaceutical Inspection Co-operation Scheme
PPB:	Pharmacy and Poisons Board
WHO:	World Health Organization

GLOSSARY OF TERMS

Dissemination This means PPB's initiated or sponsored distribution of information to the public.

Government information This means information created, collected, processed, disseminated, or disposed of by or for the Government.

Information This includes all records held by a public entity or a private body, regardless of the form in which the information is stored, its source or the date of production. This includes information held in any format, such as:

- Written documents, reports, memos, letters, notes, emails and draft documents;
- Non-written documentary information, such as material stored on or generated by computers and databases, video and tape recordings, maps and photographs; and
- Information which is known to an agency but which has not yet been recorded in writing or otherwise.

Information dissemination product This means any books, paper, map, machine-readable material, audiovisual production, or other documentary material, regardless of physical form or characteristic, an agency disseminates to the public. This definition includes any electronic document, CD-ROM, or Web page.

Integrity This refers to security – the protection of information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

Objectivity This consists of two distinct elements: presentation and substance. The presentation element includes whether disseminated information is presented in an accurate, clear, complete, and unbiased manner and in a proper context. The substance element involves a focus on ensuring accurate, reliable, and unbiased information.

Personal information This means information about an identifiable individual.

Publicly available information	This means information that: a) is published in printed or electronic form or broadcast: b) is generally available to members of the public free of charge or on payment of a fee c) is included in a public register
PPB initiated distribution of information to the public	This refers to information that the Board distributes or releases which reflects, represents, or forms any part of the support of the policies of the Agency
PPB sponsored distribution of information to the public	This refers to situations where the Board has directed a third party to distribute or release information, or where the Board has the authority to review and approve the information before release.
Quality	This is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these four statutory terms, collectively, as "quality."
Utility	This refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the Board disseminates to the public, PPB considers the uses of the information not only from its own perspective but also from the perspective of the public.

ACKNOWLEDGMENTS

We acknowledge the following directorates for their contribution towards the development of this guideline.

Registrar's/CEO's Office, Directorates of Corporate Services, Medical Products and Health Technologies, Pharmacy Practice and Laboratory Services.

EXECUTIVE SUMMARY

The Constitution of Kenya, 2010 under Article 35 guarantees every citizen the right of access to information which is actualized under the Access to information Act, 2016. In ensuring implementation of this right, the Board has developed this guideline to ensure and maximize the quality, objectivity, utility and integrity of information disseminated by the Board.

This Guideline, in addition to the above, sets forth an administrative mechanism whereby the public can obtain information maintained and disseminated by the Board. Every employee making decisions or taking any action related to obtaining and using publicly available information must have regard to this guideline. The implementation of this guideline takes into account the Data Protection laws in Kenya.

We undertake to review these guidelines and incorporate up-to-date practices, as may be necessary for our setting to achieve public policy objectives.

Dr. F.M. Siyoi
CHIEF EXECUTIVE OFFICER

1.0 INTRODUCTION

1.1 The Pharmacy and Poisons Board (PPB) is Kenya's National Medicines Regulatory Authority established in 1957 under the Pharmacy and Poisons Act, Chapter 244 of the Laws of Kenya. The Board regulates the Practice of Pharmacy and the Manufacture and Trade in Health products Technologies.

1.2 The mandate of the PPB is to promote and protect public health by ensuring that medicines, medical devices and other health technologies are safe, efficacious and of acceptable quality. The PPB also advises government entities and the public on matters of safety, quality and effectiveness of medical products.

1.3 The Access to Information Act 2016 requires Government agencies to make official information more freely available, to provide for proper access by each person to official information relating to that person, to protect official information to the extent consistent with the public interest.

1.4 The purpose of this guideline is to ensure and maximize the quality, objectivity, utility and integrity of information disseminated by the PPB, and to set forth an administrative mechanism whereby the public can obtain information maintained and disseminated by the Board. In implementing this guideline, PPB acknowledges that ensuring the quality of information is an important management objective that takes its place alongside other PPB objectives, such as observing budget and resource priorities and restraints, and providing useful programs and information to the public.

1.5 LEGAL FRAMEWORK

1.5.1 The Constitution of Kenya, 2010 under Article 35 grants every citizen the right to access information held by the State and information held by another person and required for the protection of any right or fundamental freedom. This requirement is further expounded under the Access to Information Act, 2016 ('the Act') which provides a framework for public entities and private bodies to proactively disclose information that they hold and to provide information on request in line with the constitutional principles.

1.5.2 Section 5 of the Act in particular mandates public entities to share information including but not limited to guidelines used by the entity in its dealings with the public or with corporate bodies, including the rules, regulations, instructions, manuals and records, held by it or under its control or used by its employees for discharging its functions; and announcing the decisions which affect the public. Further, the Act provides that the information may be published or communicated to the public in general or to the persons likely to be affected thereby in particular.

1.5.3 The Act, under Section 6, provides for the limitations of the right to access information which circumstances are considered to be out of the scope of information to be shared under this guideline.

1.5.4 This guideline therefore seeks to provide a framework for information sharing in line with the requirements on access to information while observing the data protection laws and right to privacy. This guideline should be read together with:

1. The Constitution of Kenya, 2010
2. Access to Information Act, 2016
3. Data Protection Act, 2019
4. Pharmacy and Poisons Act, Cap 244

1.6 SCOPE

1.6.1 This guideline applies to sharing, periodically reviewing and maintaining all such information, guidelines and procedures and regulatory decisions that is meant to be publicly available and accessible to stakeholders and the general public.

1.6.2 It covers information that may be shared by any of the PPB employees in their capacity and routine work under delegation; the responsibility of sharing information lies with the Chief Executive Officer.

1.6.3 The Scope of information sharing covered by this guideline excludes:

1. Information intended for PPB employees

2. Information relating solely to correspondence with individuals or persons
3. Information likely to lead to a breach of intellectual property rights
4. Documents not authored by PPB and not intended to represent PPB's views as long as the documents are not disseminated by PPB
5. Opinions where the presentation makes it clear that what is being offered is not the official view of PPB
6. Information and material where unauthorized disclosure would be prejudicial to the interest of the Republic, would cause serious injury to the interest of the Republic, restricted information or classified documents

1.7 OBJECTIVE

1.7.1 The overall objective of this guideline is to ensure that the PPB is open, transparent and accountable.

1.7.2 The guideline is intended to ensure that information on PPB final decisions and the relevant documents that support them are communicated to regulated entities and the general public.

1.7.3 The guideline is also intended to ensure that information that has been publicly shared is current and is quickly and easily accessible.

2.0 MECHANISMS FOR PUBLICLY SHARING INFORMATION

2.1 The PPB will consider the appropriate mechanism of sharing information to the public based on the data and information sensitivity classification prescribed under Table 1.

2.2 The mechanisms include but are not limited to uploading the information on the organization's website, social media platforms, electronic media & print media, specified online systems among others.

2.3 INFORMATION MANAGEMENT IN PPB

2.3.1 The collection, use, and dissemination of information of known and appropriate quality are integral to ensuring that PPB achieves its mission to protect and promote the health of the public by regulating the profession of pharmacy and ensuring access to quality, safe, efficacious and affordable health products and technologies.

2.3.2 All information to the public shall be authorized by the Chief Executive Officer in line with the prescribed Public Communication Procedure CSD/CCD/SOP/004. Publicly available information shall be reviewed on a regular basis, as specified in the prescribed procedure in the Control of Document CEO/PQR/QMS/SOP/001, to ensure that the latest updates are available to the public.

2.3.3 PPB shall ensure that where any difficult or sensitive issues regarding the legality or propriety of the collection and use of publicly available information arise, these are dealt with at a sufficiently senior level within the Board. For example, publicly available information may include information that has been previously leaked from or mislaid by its owner. In situations where this is known or suspected to have occurred, employees must ensure that the issue is escalated appropriately and where necessary expert advice, including legal advice, is sought.

2.3.4 The Principles for Data Responsibility as specified in Annex A shall be followed to inform safe, ethical and effective operational data management within the organization. They shall serve as a normative guide for actors implementing the recommended actions for data responsibility outlined in this Information sharing Protocol.

3.0 TRANSPARENCY AND ACCOUNTABILITY IN DECISION MAKING

3.1 The Board endeavors to be accountable to the public, the bodies it regulates and to the government of Kenya for its actions and decisions as part of good governance and accountability.

3.2 In the context of Good Regulatory Practice, PPB ensures transparency and public access to both the process and the criteria of regulatory decision making.

3.3 In an objective to foster transparency and accountability on its regulatory actions/operations and decisions the board will be:

1) ensure that procedures and contact points for obtaining information held by the Board are accessible and clear.
2) responsible for acting according to established standards and commitments.
3) answerable for its actions and
4) willing to face the consequences when the standards or commitments are not met.
5) make known to the regulated entities and the general public

3.4 This will contribute towards review of regulatory decisions, including internal appeals and judicial appeal of the decisions of the Board such as on the grounds of procedural fairness and due process, in addition to scientific and administrative grounds. It is also essential for building trust and confidence in the regulatory system.

4.0 CATEGORIES OF INFORMATION TO BE PUBLICLY SHARED

4.1 In developing the guideline, PPB divides information that it disseminates into six categories based on the content. Please note the classification used in table 1 based on the sensitivity of the information and level of controls required during information sharing.

4.2 The following six broad categories are identified:

a) **Administrative:** This includes all non-scientific, non-financial, non-statistical information. Examples are the Mandate, mission, vision, Web site and individual Web pages, program and organizational descriptions,

brochures, pamphlets, newsletters, and other general descriptions of PPB operations and capabilities.

b) **Regulatory Decisions:** This includes authorized health products and health technologies (HPTs), licensed manufacturers of HPTs, recalled HPTs, licensed pharmacists and pharmaceutical technologists, authorized clinical trials among others.

c) **Surveys and Industry Assessments:** This includes studies issued by PPB pursuant to the Pharmacy and Poisons Act, Cap 244 of the Laws of Kenya as amended, and reports of investigations.

d) **Training and Seminars:** This includes information that is disseminated verbally and in written form by PPB personnel at educational workshops and seminars sponsored by PPB.

e) **Laws, Regulations/Rules & Guidelines:** This includes all laws**,** rules and regulations, manuals, policies, protocols, public notices touching on regulation of pharmacy practice, medical products and health technologies.

f) **Third-party Information:** Third-party information from both domestic and international sources, such as international and regional organizations such as World Health Organization (WHO), ICH, PIC/S, IGAD, EAC, AU may be included in information that PPB disseminates. When such information is disseminated, any limitations, assumptions, collection methods, or uncertainties concerning such information will be taken into account and disclosed.

5.0 DATA AND INFORMATION SENSITIVITY

5.1 The Data and Information Sensitivity Classification indicates the level of sensitivity of different types of data and information for a given context.

5.2 Data sensitivity is the classification of data based on the likelihood and severity of potential harm that may materialize as a result of its exposure in a particular context. If disclosed or accessed without proper authorization, sensitive data and information are likely to cause:

1) harm - negative implications
2) a negative impact on the capacity of the Board

3) an erosion of trust within key stakeholders

5.3 ACTIONS FOR DATA RESPONSIBILITY

Data responsibility requires the implementation of principled actions at all levels. These include for example actions to ensure data protection and data security, as well as strategies to mitigate risks while maximizing benefits in all steps of operational data management.

6.0 DATA INCIDENT MANAGEMENT

6.1 Data incident management helps reduce the risk of incidents occurring, supports the development of a knowledge base, and fosters more coordinated approaches to incident management over time.

6.2 Data incidents are events involving the management of data that have caused harm or have the potential to cause harm to crisis affected populations, organizations, and other individuals or groups.

6.3 Data incidents should be addressed as soon as possible and be recorded in order to prevent them from reoccurring. These include:

1) Unwarranted or unauthorized disclosure of data

2) Loss, destruction, damage, or corruption of data

6.3.1 While data incident management should be handled primarily at the organizational level, it is important to track incidents across the response in a common registry that captures key details about the nature, severity and resolution of different incidents. Under this guideline, the heads of directorates and the individual clusters are tasked with supporting this activity.

7.0 BREACHES TO THE GUIDELINES AND DISPUTE RESOLUTION

7.1 Should there be a breach of this guideline by any of the participating members, members will work to resolve such issues bilaterally.

7.2 If a resolution cannot be reached, the CEO should organize a dedicated meeting with the parties concerned to determine the appropriate course of action.

7.3 In case of differences in interpretation of this guideline or other related disputes, the CEO will be responsible for finding an amenable resolution.

7.4 If such a resolution cannot be found, the CEO will refer the dispute to the Office of the Ombudsman or the Office of the Data Commissioner as the case may be.

8.0 RECOMMENDATION FOR INFORMATION SHARING

8.1 Sharing of **information classified as public information** including regulatory requirements, processes, fees, assessments, decisions and actions as well as the rationale for the decisions should be documented and made publicly available on PPB website.

8.2 Under this recommendation the Board will establish and maintain a searchable public website that contains the following basic information:

8.2.1 the roles, responsibilities, organization and contact information of the board.

8.2.2 access to the laws, regulations, guidelines and procedures necessary to satisfy regulatory requirements and improve the safety, efficacy and quality of medical products.

8.2.3 a searchable registry of approved, suspended and withdrawn products.

8.2.4 product information for health care professionals and patients.

8.2.5 the licensing status of manufacturing sites.

8.2.6 health advisories, safety information, alerts on quality or on substandard or falsified medical products, advisory notices, recalls and other time-sensitive information of public health interest.

8.2.7 performance targets and results and annual reports.

8.2.8 proposed new regulatory instruments, including periods for comment and how to provide input and

8.2.9 public assessment reports and reports of facility audits or inspections. PPB may redact any trade secret or confidential personal or commercial information before publication.

8.3 **Information classified as confidential and/or restricted** created or accessed in the course of regulation shall be sent directly to individual stakeholder, including industry, researcher, health professional, patient and consumer. Under this provision:

8.3.1 Measures will be established to prevent the disclosure of such information, with a mechanism to address disputes about the proprietary nature or confidentiality of information.

8.3.2 The Board shall use the official email or any other registered contacts.

8.3.3 Regulated parties should be able to access the full reports of a product assessment or site inspection that pertains to them.

8.4 The findings of all audits or oversight reviews of the performance and functioning of the Board will be made publicly available on PPB website.

8.5 **Information classified as strictly confidential** shall not be disclosed under any circumstances. A board officer who, by reason of his position, routine duty either generates or accesses such data shall be duty bound to never disclose this information. under this recommendation:

8.5.1 the officer under here does not have the capacity or authority to disclose such information. He/she may not even act under delegation

8.5.2 only the CEO may share this information under exceptional and justifiable circumstances including:

1) legislative requirements,

2) court order,

3) audit by the auditor general for financial statements and related records,

TABLE 1: PPB GUIDE ON CLASSIFICATION OF INFORMATION

The Access to Information Act 2016 requires Government agencies to make official information more freely available: Below is the information sharing guide						
Sensitivity Level	**Classification**	**Proposed colors**				
Strictly Confidential	Information or data that, if disclosed or accessed without proper authorization, are likely to cause severe harm or negative impacts or impede the conduct of the work of PPB.	RED				
Confidential	Information or data that, if disclosed or accessed without proper authorization, are likely to cause serious harm or negative impacts or damage to the Board	YELLOW				
Restricted	Information or data that, if disclosed or accessed without proper authorization, are likely to cause minor harm or negative impacts and/or be disadvantageous for affected people	BLUE				
Public	Information or data that if disclosed or accessed without proper authorization are unlikely to cause harm or negative impact. This information should be publicly shared e.g on website or Press release or Gazette notices	GREEN				
		Security Level				
DEPARTMENT/DIVISION	**INFORMATION/ DATA/RECORDS**	**Strictly confidential**	**Confidential**	**Restricted**	**Public**	**Remarks**
Board of Directors	Personal health information					
	Confidential Board Information					
	Public and Private Disclosures					
	Confidential policies					
CEO's Office	PPB seal					
	Confidential Correspondence records					
	Departmental minutes and reports					
	Recognition certificate- ISO certification					
CORPORATION/LEGAL SERVICES	PPB Title documents					
	Contracts/MOUs/leases					
	Court records/Active cases matrix					
	Treaties/regulations / Circulars					
	Legal Notices/Gazette Notices					
	List of external lawyers					

	Departmental minutes and reports					
	Departmental work plan					
	Board minutes					
	Board Members profile					
	Legal opinions					
	Legislation i.e Cap 244					
FINANCE	PPB Bank balances					
	Budgets					
	Monthly and quarterly financial reports					
	Departmental minutes and reports					
	Payroll reports/pay slips					
	Annual financial report					
PHARMACY PRACTICE	List of CPD providers					
	List of Licensed pharmacies					
	List of Licensed Pharmaceutical Manufacturers					
	Registered pharmacists' records					
	List of registered & licensed Pharmacists					
	Enrolled pharmtechs records					
	List of enrolled & licensed Pharmtechs					
	List of approved training institutions					
	Departmental minutes and reports					
	Annual reports					
	Examination records					
	Examination results					
	Disciplinary records					
	Disciplinary outcomes					
PRODUCT SAFETY	Market surveillance reports					
	QSE Minutes					
	Investigation reports					
	COAs					
	Communications records-letters, emails etc					
	PMS protocols					
	Poor quality medical products reports					
	PV Safety reports					
	Safety analysis reports					
	Stakeholders training on PV reports					
	Technical expert recommendation reports					
	Surveillance studies Reports					
	Recall notifications					
	Rapid Alert on Quality of Medical Products					

	Clinical trials safety reports					
	Protocol deviation reports					
	Data Safety Monitoring Board reports					
	Clinical trials annual progress reports					
	Clinical trials bi-annual reports					
	Good clinical practice inspection reports					
	Clinical study reports					
	List of Approved Clinical Trials					
	Departmental minutes/report					
	Annual reports					
	Departmental policies/guidelines					
	Promotional advertisement market surveillance reports					
	Health Products rescheduling reports					
INSPECTORATE & ENFORCEMENT	Consumer complaints records					
	Inspection reports					
	Departmental policies/guidelines					
	Annual reports					
	Court cases records					
	Closed premises records					
	Medical products seizure reports					
	Medical products destruction reports					
	Certificates of disposal					
	Stakeholder engagement reports					
	Standard Operating Procedures					
PRODUCT EVALUATION AND REGISTRATION	Product evaluation reports					
	Registered products records					
	Annual product retention records					
	Departmental policies/guidelines					
	Annual reports					
	Departmental minutes/reports					
	Non-compliant products records					
QUALITY CONTROL	Departmental minutes/reports					
	Equipment, standards & reagents inventory					
	Equipment manuals					
	Sample collection forms					
	Laboratory analysis reports					
	Departmental SOPs					
	Equipment calibration reports					
TRADE AFFAIRS	Departmental minutes/reports					

	Annual reports					
	Imports records					
	Export records					
	Departmental policies/guidelines					
GMP	GMP Inspection reports					
	Inspection schedules					
	GMP Approved manufacturing sites records					
	GMP status of companies					
	GMP certificates					
	Departmental guidelines					
INTERNAL AUDIT & RISK ASSURANCE	Departmental minutes/reports					
	Audit plan					
	Audit reports					
	Risk management plan					
ADMINISTRATION	Departmental policies/guidelines					
	Departmental minutes/ reports					
	Work ticket records					
	Transport voucher records					
	Fuel consumption records					
	Insurance reports					
	Insurance claims records					
	Utility payment records-water bills, land rents, telephone, electricity bills					
	Accident investigation reports					
ICT	Database records					
	Departmental minutes/reports					
	User information records					
	Data logs					
	Configs and Setup Templates					
HUMAN RESOURCE	Departmental manuals					
	Departmental minutes/reports					
	Appointment letters					
	Promotion letters					
	Staff training/evaluation reports					
	Payroll records					
	Warning/suspension letters					
	Leave records					
	Staff job description records					
	Staff work attendance records					
	Departmental Policy-Strategic Plan					

PLANNING, QMS & RESEARCH	Annual reports					
	SOPs					
	Quarterly reports					
	CEO's Annual report					
	PPB Performance Contract					
	Internal quality audit reports					
	Research and Development policy					
	Customer Service Charter					
REGIONAL OFFICES	Department minutes/reports					
	Annual reports					
	List of registered pharmaceuticals premises					
	Asset register					
	Staff files					
SUPPLY CHAIN MANAGEMENT	Tender documents					
	Pre-qualification reports					
	Tender evaluation reports					
	Departmental minutes/reports					
	Contracts					
	Pre-qualified suppliers list					
	Inspection and acceptance reports					
	Assets disposal reports					
	Report on youth, women and PWDs					
COMMUNICATIONS	Departmental minutes/reports					
	Departmental Workplan					
	Publications-newsletters,					
	Public notices, advertisements & supplements					
	Media monitoring reports					
	Media highlights					
	Correspondence records-memos, letters					
	Departmental policies/guidelines					
	Media enquiries records					
	Social media posts					
	IEC materials					
	Press releases					

REFERENCE

Public Sector Communications Policy, 2017

The Constitution of Kenya, 2010

Access to Information Act, 2016

Policy Guidelines for the Development and Promotion of Governmental Public-

UNESCO

PPB Communications Policy

REVISION HISTORY

AUTHORS /CONTRIBUTORS

Pharmacy and Poisons Board-Republic of Kenya

CCD- Corporate Communications Division

CSD- Corporate Services Directorate

QMS- Quality Management Systems

Legal

ANNEXES

ANNEX A: Principles for Data Responsibility

The following Principles for Data Responsibility are designed to inform safe, ethical and effective operational data management within the organization. They should serve as a normative guide for actors implementing the recommended actions for data responsibility outlined in this information sharing protocol.

Accountability
In accordance with relevant applicable rules, directorates have an obligation to account and accept responsibility for their data management activities. To achieve their accountability commitments, directorates should put in place all measures required to uphold and monitor adherence to these principles. This includes establishing adequate policies and mechanisms and ensuring the availability of sufficient competencies and capacities, including but not limited to personnel, resource and infrastructure capacity.

Confidentiality
Directorates should implement appropriate organizational safeguards and procedures to keep sensitive data confidential at all times. Measures should be in line with general confidentiality standards and applicable organizational policies and legal requirements, while taking into account the context and associated risks.

Coordination and Collaboration
Coordinated and collaborative data management entails the meaningful inclusion of partners, national and local authorities, and other stakeholders in data management activities, all where appropriate and without compromising these principles. Coordination and collaboration should also aim to ensure that appropriate connections are established.

Data Security
Directorates should implement appropriate organizational and technical safeguards, procedures and systems to prevent, mitigate, report and respond to security breaches.

Fairness and Legitimacy
The organization shall manage data in a fair and legitimate manner, in accordance with their mandates, the context of the response, governing instruments, and global norms and standards, including these principles.

Human Rights-Based Approach
Data management should be designed and implemented in ways that respect, protect and promote the fulfilment of human rights, including the fundamental freedoms and principles of equality and non-discrimination as defined in human rights frameworks, as well as the more specific right to privacy and other data-related rights, data-specific rights promulgated in applicable data protection legislation and other applicable regulation.

People-Centered and Inclusive
The public should be afforded an opportunity to be included, represented, and empowered to exercise agency throughout data management whenever the operational context permits. Special efforts should be made to support the participation and engagement of people who are not well represented and may be marginalized in the data management activity at hand (e.g., due to age, gender and other diversity factors such as disability, ethnicity, religion, sexual orientation or other characteristics), or are otherwise 'invisible', consistent with commitments to leave no one behind.

Quality Data
Quality should be maintained such that users and key stakeholders are able to trust operational data management and its resulting products.

Retention and Destruction
Sensitive data should only be retained for as long as it is necessary to the specified purpose for which it is being managed or as required by applicable law or donor audit regulations. When its retention is required, safe and secure storage should be ensured to safeguard sensitive data from being misused or irresponsibly exposed.

Transparency
Data management in humanitarian response should be carried out in ways that offer meaningful transparency toward stakeholders. This should include provision of information about the data management activity and its outputs, as well as data sharing in ways that promote genuine understanding of the data

management activity, its purpose, intended use and sharing, as well as any associated limitations and risks.

Respect for privacy
There may be some privacy interests in publicly available information, particularly where that information is personal information. This does not preclude the Board from accessing or using that information, but special precautions may need to be taken to protect particularly sensitive information once collected.

Necessity
Publicly available information, including personal information, should only be obtained and used for a purpose that is consistent with PPB performing their statutory functions.

Legality
PPB must ensure that the collection and use of publicly available information will be carried out in accordance with the law. Where appropriate, legal advice should be sought.

Annex B: Public Communications Procedure (CSD/CCD/SOP/003)

Annex C: Control of Documents (CEO/PQR/QMS/SOP/001)

Annex D: Communications Policy