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## Confidentiality Policy

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<b>Developed By:</b>	Human Resources, VP Finance & Information Systems	<b>File Number:</b>	
<b>Approved By:</b>	Senior Management Committee	<b>Review Frequency:</b>	Annually
<b>Original Approval Date:</b>	March 20, 2000	<b>Review/Revision Date:</b>	September 21, 2000 Oct 2, 2003 July 27, 2009

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### Policy

This policy applies to all employees, physicians, volunteers and other agents of the organization.

Individuals will access confidential information only to the extent necessary to carry out their duties at the hospital. Except as required in the performance of a task related to their specific patient or work assignment, individuals will not in any way retrieve, read, repeat, copy, release or transmit such information to any other individual or organization. Individuals must hold in strict confidence all information obtained through their employment, and must not disclose such information to any individual inside or outside the hospital, including their immediate family members.

Breaches of this policy are considered cause for discipline, up to and including termination or loss of privileges, in accordance with the "Progressive Discipline" Policy.

### Definition

Confidential information includes, but is not limited to:

- patient information (medical records, conversations concerning their condition or treatment, financial circumstances, family circumstances etc.);
- donors
- employee information (employment records, salaries, family and/or personal circumstances etc.)
- hospital business information (financial and statistical information, strategic planning, internal reports, etc.).

### Procedure

#### Handling and Storage of Confidential Material

1. Circulate confidential materials in sealed envelopes or storage cases.
2. Address and mark confidential material envelopes with "PERSONAL AND CONFIDENTIAL". These envelopes are to be opened only by the persons to whom they are addressed or by persons designated by managers as being responsible for handling confidential material.
3. Handle confidential material appropriately and, when finished with documents, place in the shredding receptacles located throughout the Hospital.
4. When faxing confidential material to physicians' offices, other hospitals, or to any other locations, the sender should telephone the intended recipient before sending and arrange for the recipient to be standing by to receive the fax. Where possible, fax numbers should be programmed into the speed dialing feature of fax machines to avoid the risks of misdialing.
5. At the end of the working day, individuals must lock doors, desks, filing cabinets and any other storage cabinets containing confidential material. They must keep them closed and secure at all other times.

**Protection of Electronic Data**

1. Individuals must log off their computer at the end of their shift or when they are to be away from their terminals for an extended period of time.
2. Computer passwords are to be changed semi-annually.
3. Individuals must safeguard and must not disclose their computer access codes or any other access mechanisms they have. They are responsible for all activities undertaken using their access code or other mechanisms, except where this information was obtained by fraudulent means and the individual could not have prevented such unauthorized use through diligent precautionary measures.
4. Where possible, computer monitors should be positioned so that they cannot be seen easily by anyone other than the user.
5. Any requirement for electronic transmission of patient information outside of HHS, must be reviewed in advance by Information Systems, to ensure that the technology and process utilized is secure.

**Breaches, or Suspected Breaches, of Confidentiality**

1. Anyone becoming aware of a breach of confidentiality, or suspect that a breach has occurred, is to report the incident to their supervisor, who will notify the Privacy Officer. An investigation will be conducted as expeditiously as possible, in accordance with the "Progressive Discipline" policy.
2. Anyone becoming aware of fraudulent use of their access codes or authorization mechanisms, must notify their supervisor immediately. The supervisor will immediately report the incident to their Vice-President and the Director of Information Systems.

**Orientation**

This policy is to be reviewed with the following individuals, who will be given a copy of the policy and who will be required to sign as follows:

- All new employees during the hiring process (original to be retained by Human Resources)
- Physicians newly appointed to the medical staff (original to be retained by Medical Staff Office)
- All new volunteers (original to be retained by Volunteer Services)
- All students (original to be retained by the Office of Professional Practice)

This policy is also to be reviewed with all consultants and other agents of the Hospital, who must agree to adhere to this policy.

**I, \_\_\_\_\_, have read and understood the above policy, and**  
(please print)  
**agree to abide by the conditions of this policy. I am aware if I act against this policy, my actions could be cause for discipline, up to and including termination or loss of privileges.**

**Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Unit/Dept** \_\_\_\_\_

**For Students Only:**

**Educational Institution:** \_\_\_\_\_

**Placement Location:** \_\_\_\_\_

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

References:

Reviewed By/Consultation With:

Rebecca Durcan, Miller Thomson LLP  
Ted Crabtree

Key Words:

Confidentiality, Privacy, Privacy Officer, Password, Confidential, Patient Information, Computer Access, Electronic Health Record, Breach, Secret, Orientation

Other Policies Related to Topic:

[Progressive Discipline Policy](#)

Signed By: \_\_\_\_\_

Title: President and CEO

(Archived Copy Only)

**Note to Employees in CUPE Bargaining Unit**

**The subject matter of this policy is addressed in the collective agreement between the Hospital and CUPE, Local 815. Please refer to your collective agreement and, if the agreement conflicts with this policy, the collective agreement will prevail.**