



SUN COUNTRY HEALTH REGION & AFFILIATES

Section: IM: Information Management	Policy & Procedure # IM-00-00	Page: 1 of: 5
Sub-section: IM-00: Communications		
Subject: Privacy/Confidentiality		
Issued: November 2005		
Evaluated/Revised: October 2010		
Initiated By: <i>K Bostock</i>		Krista Bostock, Health Information Management/Privacy Officer
Authorized By: <i>Marga Cugnet</i>		Marga Cugnet, Interim President and Chief Executive Officer

POLICY:

The Sun Country Regional Health Authority maintains that all Personal Health and Organizational information which is obtained in the workplace by an employee or any person providing services to the Region will not be disclosed to unauthorized persons for unauthorized purposes. Personal Health and Organizational information must only be accessed as required by your job duties.

PURPOSE:

The purpose of this policy is to protect the privacy/confidentiality of the information that Sun Country Health Region employees access, collect, maintain, use and/or transmit.

Breaches of privacy/confidentiality are considered a serious violation and will result in discipline up to and including dismissal.

DEFINITIONS:

‘Breach of Privacy/Confidentiality’ refers to the failure to comply with this policy.

‘Confidentiality’ refers to treating information as private and using discretion in sharing information that is not for disclosure beyond a mutually agreeable scope or is not to be used other than for specifically identified purposes in relation to one’s official job duties.

‘Invasion of Privacy’ refers to the wrongful intrusion by individuals or the government into private information with which the person or public has no concern or no “need to know”.

‘Organizational Information’ refers to all Sun Country Health Region information that is not Personal Health information. This would include, but not be limited to, personal, business and financial information.

‘Personal Health Information’ means, with respect to an individual, whether living or deceased:

- (i) information with respect to the physical or mental health of the individual;
- (ii) information with respect to any health service provided to the individual;
- (iii) information with respect to the donation by the individual of any body part or any bodily substance of the individual or information derived from the testing or examination of a body part or bodily substance of the individual;
- (iv) information that is collected:
 - (a) in the course of providing health services to the individual; or
 - (b) incidentally to the provision of health services to the individual; or
- (v) registration information.

‘Privacy’ refers to a person’s right to control who gets to access and see their information and how it is used. Privacy is a fundamental right of an individual that is governed by law. It is the individual’s right to be secure from unauthorized access of information about themselves.

GENERAL INFORMATION:

Information that the Sun Country Health Region considers to be private and confidential includes, but is not limited to, the following:

1. Information related to the health and/or personal affairs of clients, patients, residents and their families/visitors.
 2. Personal information of employees (e.g. leadership, directors, managers, supervisors, coworkers), physicians, contractors, volunteers and students.
 3. Business and financial information.
- All information relating to the above, whether written, verbal, electronic, or in any other form, is considered private and confidential. Electronic information includes e-mail, databases (e.g. Electronic Health Records - EHR) and web based databases (e.g. Pharmaceutical Information System - PIP, SAHO Web Portal).

SUN COUNTRY HEALTH REGION & AFFILIATES – POLICY & PROCEDURE	TOPIC: Privacy/Confidentiality	POLICY & PROCEDURE NO.: IM-00-00	
		PAGE: 2	OF: 5

This policy applies, but is not limited, to the following:

Sun Country Health Region

1. Employees
 2. Physicians
 3. Contractors
 4. Volunteers
 5. Students
 6. Clinic staff (e.g. primary health care sites)
 7. Other medical or health professionals who provide services to individuals or groups
- Privacy/Confidentiality requires that only certain individuals have the right to access information and that it is secure from others.
 - Personal Health information should only be accessed on a ‘need to know’ basis. Limit your access to those clients, patients and residents to whom you are providing care or to consultation with other providers for the treatment of a client, patient or resident.
 - Organizational information should only be accessed on a ‘need to know’ basis. Limit your access to the information you require to perform your job duties.
 - Never access information for reasons of personal interest or curiosity. This is an invasion of privacy and a breach of privacy/confidentiality.
 - Personal Health and Organization information shall be used or disclosed only for the purpose which it was collected.
 - Discretion should be used at all times within and outside the workplace when discussing private and confidential information. For example, discussion or gossip about private or confidential information is prohibited in employee offices, coffee rooms, elevators, corridors, cafeterias, grocery lines, banks and all other locations.
 - Misuse of Personal Health or Organizational information is considered a breach of privacy/confidentiality and may result in disciplinary action up to and including dismissal.

EXAMPLES:

Private and Confidential information includes, but is not limited to, the following:

1. The identity of patients, clients, residents and their families.
2. The diagnosis, tests, or treatment of patients, clients and residents.
3. Observations made about patients, clients and residents and conversations with them or their families.
4. Information the patient, client or resident discloses about his/her illness, their family members or situation and information acquired in their examination.

SUN COUNTRY HEALTH REGION & AFFILIATES – POLICY & PROCEDURE	TOPIC: Privacy/Confidentiality	POLICY & PROCEDURE NO.: IM-00-00	
		PAGE: 3	OF: 5

5. The occurrence of accidents, deaths or injuries at health care agencies and the occurrence of differences or confrontations between or among patients, clients, residents, employees, physicians, visitors or others.
6. Information about Sun Country Health Region employees, physicians or volunteers (e.g. employment records, disciplinary actions).
7. Sun Country Health Region's business information (e.g. financial, statistical, internal reports, contracts).

PROCEDURE:

Employees

1. All employees will receive a copy of the **Privacy/Confidentiality** policy upon hire and then as determined by management.
2. All employees will be required to sign a **Pledge of Privacy/Confidentiality** - Form [IM001](#) (Appendix A).
3. All employees must abide by all regional and facility policies and procedures and provincial legislation related to privacy/confidentiality access and disclosure of information.
4. All employees must obtain authorization from their manager/supervisor before accessing Personal Health or Organizational information using web based systems on private or home computers.
5. All employees have the responsibility to protect the privacy/confidentiality of information when they see a breach occurring. Report breaches of privacy/confidentiality to someone who can advocate for the person or information, such as a nurse, manager or the privacy officer.
6. Leadership/Directors/Managers/Supervisors, in consultation with Human Resources, may impose disciplinary action up to and including dismissal for any breaches of privacy/confidentiality.

Physicians

1. All physicians will receive a copy of the **Privacy/Confidentiality** policy upon hire and then as determined by the Vice-President of Medical.
2. All physicians will be required to sign a **Pledge of Privacy/Confidentiality** - Form [IM001](#) (Appendix A).
3. All physicians must abide by all regional policies and procedures and provincial legislation related to privacy/confidentiality access and disclosure of information.
4. All physicians have the responsibility to protect the privacy/confidentiality of information when they see a breach occurring. Report breaches of privacy/confidentiality to someone who can advocate for the person or information, such as the Vice-President of Medical.
5. Failure to comply with this policy or failure to preserve the privacy/confidentiality of Personal Health or Organizational Information in accordance with this policy and

SUN COUNTRY HEALTH REGION & AFFILIATES – POLICY & PROCEDURE	TOPIC: Privacy/Confidentiality	POLICY & PROCEDURE NO.: IM-00-00	
		PAGE: 4	OF: 5

relevant legislation shall be investigated and managed as defined in the Sun Country Regional Health Authority Practitioner Staff Bylaws.

Contractors/Other medical or health professionals

All Contractors/Other medical or health professionals will be required to read and sign the Sun Country Health Region **Confidentiality Agreement** for agencies providing service to the Sun Country Health Region – Form [IM012](#) (Appendix D) upon hire.

Students/Volunteers/Clinic Staff

1. All students/volunteers/clinic staff will receive a copy of the **Privacy/Confidentiality** policy upon hire and then as determined by Sun Country Health Region.
2. All students/volunteers/clinic staff will be required to sign a **Pledge of Privacy/Confidentiality** - Form [IM001](#) (Appendix A).
3. All students/volunteers/clinic staff must abide by all regional and facility policies and procedures and provincial legislation related to privacy/confidentiality access and disclosure of information.
4. All students/volunteers/clinic staff must obtain authorization from their manager/supervisor before accessing Personal Health or Organizational information using web based systems on private or home computers.
5. Failure to comply with this policy or failure to preserve the privacy/confidentiality of Personal Health or Organizational Information in accordance with this policy and relevant legislation shall be investigated and managed as per **Privacy Violations – Recommended Actions for Non-Employees** (Appendix C).

RELATED INFORMATION:

- [Appendix A](#) – Pledge of Privacy/Confidentiality – Form [IM001](#)
- [Appendix B](#) – Privacy Violations – Recommended Actions for Employees
- [Appendix C](#) – Privacy Violations – Recommended Actions for Non-Employees
- [Appendix D](#) – Confidentiality Agreement for agencies providing service to the Sun Country Health Region – Form [IM012](#)

SUN COUNTRY HEALTH REGION & AFFILIATES – POLICY & PROCEDURE	TOPIC: Privacy/Confidentiality	POLICY & PROCEDURE NO.: IM-00-00	
		PAGE: 5	OF: 5