

## **SECTION 1 – Privacy**

### **1.07 Ensuring Safeguards for Personal Health Information (PHI)**

#### **Policy**

Taddle Creek Physicians will comply with the Personal Health Information Privacy Act, 2004 (PHIPA).

#### **Procedure**

1. Taddle Creek Physicians will collect, store transfer and destroy patients' PHI in secure manner to prevent unauthorized use, copying or disclosure.
2. If a patient's PHI is stolen, lost or accessed by unauthorized persons we will notify patients.
3. Reasonable steps will be taken to ensure physical security, the following is a list of some steps we will take:
  - Physical files containing PHI will be locked and/or supervised
  - Printers/fax machines will be monitored and placed in a secure area
  - Access to offices will be restricted
  - Alarm systems may be used
  - One person will be assigned the task of making sure the office, PHI and computers are locked at the end of the day
  - PHI will not be exposed when equipment is being serviced
  - PHI that is not protected by a hard drive password will be removed or encrypted when equipment goes off-site and those servicing will sign a Information Sharing/Non Disclosure Agreement
  - Adequate shredding machines will be made available to securely dispose of PHI no longer required.
4. Reasonable steps will be taken to ensure technological security, the following is a list of some steps we will take:
  - Each staff member will have their own user ID/passwords to access PHI and be instructed never to share their user name/password
  - Staff will be instructed on how to create acceptable passwords and how to change them periodically
  - We will utilize up-to-date Anti-virus, Firewall and Spyware software on computers
  - Staff will not install any unauthorized software or connect any unauthorized devices to their computer or use their computer for unauthorized purposes

- Staff cannot copy or transmit externally any PHI from their computers unless authorized (including email or instant messaging) and if authorized (e.g. transmitting OHIP billing) will use encryption and/or a secure sites (e.g. Smart Systems for Health Agencies-VPN)
  - Staff will be advised to be aware of the 'reader over the shoulder' and neighbors overhearing loud conversations.
5. Steps will be taken for administrative controls, the following lists some steps we will take:
- Criminal checks and reference checking will be done for all new employees
  - Employees will have a privacy protection clause included in their employment contracts
  - Employee access to PHI will be restricted based on their scope of practice and job responsibility
  - Employees will receive privacy/confidentiality/security training as part of their orientation
  - Staff will sign a 'Confidentiality Agreement' acknowledging their understanding of Taddle Creek Physicians privacy/confidentiality/security policies and procedures
  - Access will be removed as soon as a staff member leaves or changes responsibilities.
6. Steps will be taken to ensure Taddle Creek Physicians electronic medical record system can,
- Display and print patient records in chronological order
  - Be retrieved by patient's name and health card number
  - Uses password protection to secure
  - Automatically backs up for file recovery
  - Keep an audit trail that
    - a. Records date/time of each entry for the patient
    - b. Shows any changes in the record
    - c. Preserves the original record's content when changed or updated and can be printed separately from other patient's records.
7. Steps will be taken to ensure PHI is disposed of in a secure manner
- Hard copies will be shredded and/or burned
  - For electronic records, secure disposal means either physically destroying the media they are stored on (such as a CD) or magnetically erasing or over-writing the information (in such a way that it cannot be recovered)
  - When disposing PHI, a record of the name of patients whose records were disposed, the date the records were disposed and how the records were disposed will be kept.

Note: Encrypting information is not a method of disposal even if the encryption keys are destroyed because it is possible that encrypted information may be recovered at some time in the future.

8. Taddle Creek Physicians will inform and train our health care professionals and staff about how they must take an active role in the responsibility to ensure the security of PHI.
9. Taddle Creek Physicians will review our safeguard practices regularly to ensure compliance with PHIPA.

Approved By: Executive  
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