

	Confidentiality Agreement and Privacy Training Policy Number: X-10	Policy Domain Governance and Ethics Sub-Domain: Information and Privacy
Approved by: Chief Quality and Privacy Officer		Date Approved: August 27 2019
Policy Lead(s): Information and Privacy Officer		Date Effective: September 9, 2019
Replaces: X-10 Confidentiality Agreement and Privacy Training	Dated: July 11, 2014	Date of Next Review: September 2022

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Purpose Statement:

To outline the requirements for maintaining the confidentiality and security of all personal and health information in the custody or control of Covenant Health.

Principles:

Personnel shall maintain in strictest confidence any and all confidential information gained or learned in the course of their work regarding patients, residents, visitors, the public, physicians, staff and agencies with whom Covenant Health conducts business.

Collection, use and disclosure of personal information and/or health information within Covenant Health shall be strictly for the purpose of providing health services, performing related business services, or for other authorized purposes under FOIP or the HIA.

Personnel shall collect, use and disclose information only for the purpose of performing their job duties.

Information technology resources, including computer systems and equipment, the internet and the e-mail system, are provided for the purpose of delivering health services and performing related business activities. All personnel shall comply with applicable policies to ensure the security of the resources and the confidentiality of the information being collected, used, disclosed or stored on those resources.

Policy Statement:

Covenant Health ensures that all staff and other individuals acting on behalf of Covenant Health understand their obligations to protect the privacy and security of the personal information and health information held by Covenant Health.

All personal and health information must be protected and handled in a confidential and secure manner in accordance with the Freedom of Information and Protection of Privacy Act (FOIP), the Health Information Act (HIA) and Covenant Health policies and procedures.

Any individual who collects, uses or discloses information contrary to Covenant Health policies may be subject to disciplinary action up to and including dismissal.

Applicability:

This policy applies to all Covenant Health facilities, staff, physicians, volunteers, students and any other persons acting on behalf of Covenant Health (personnel).

Responsibility:

Every staff member, physician, volunteer, student or other person acting on behalf of Covenant Health is responsible for taking appropriate action to comply with the requirements of this policy.

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Management staff, particularly those responsible for selecting, hiring, granting privileges, or supervising personnel shall ensure that their direct reports are aware of and comply with the mandatory requirement to sign confidentiality agreements and complete Information and Privacy training as set out in this policy.

Confidentiality Agreements:

1. All personnel must sign a confidentiality agreement acknowledging their understanding and agreement to comply with their obligations to properly handle and protect personal and health information, and the rules for accessing Covenant Health's information systems. This must be completed at the time of hire or upon transfer to a new position in the organization.
 - 1.1. Employees and students must sign the Covenant Health Confidentiality and User Agreement posted on CompassionNet at <http://www.compassionnet.ca/Page1507.aspx>
 - 1.2. Volunteers must sign the Confidentiality Agreement for Volunteers posted on CompassionNet at <http://www.compassionnet.ca/Page1507.aspx> unless they access Covenant Health's information systems, in which case they must sign the Confidentiality and User Agreement.
 - 1.3. Medical staff and non-appointed medical staff (eg. clinical assistants, midwives) will sign a confidentiality agreement as established by Medical Affairs.
 - 1.4. Other persons acting on behalf of Covenant Health will be required to sign a Confidentiality Agreement appropriate to the services being provided to Covenant Health.
 - 1.5. Re-signing the applicable agreement on an annual basis is encouraged.
2. All personnel who require access to the provincial clinical information system owned and operated by Alberta Health Services (AHS) will be required to sign the applicable confidentiality and user agreement as established by AHS.
3. Signed confidentiality agreements will be maintained in the individual's personnel file, Medical Affairs file, or Volunteer Services file and retained in accordance with Covenant Health's records management policy. Post-secondary academic or training institutions are responsible to retain the agreements signed by students in accordance with institution's Student Placement Agreement.
4. Whenever required to do so, the confidentiality agreement shall be updated and re-signed.

Information Privacy Training

5. All personnel are responsible to complete the Covenant Health Information and Privacy training module relevant to their position and job duties at least every three years.
6. All personnel who require access to a provincial information system owned and operated by Alberta Health Services (AHS) may be required to complete an AHS Information and Privacy training course.
7. Persons who do not complete information privacy and security training as required, and whose role requires them to access personal and/or health information, shall not be granted access or may have their access to information systems suspended until the training has been completed.
8. An agreement or contract for services being provided by other persons acting on behalf of Covenant Health, such as appointees, agents or contractors, will specify the terms for meeting the requirements of this policy.

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Definitions:

Health Information - means any recorded information that relates to an identifiable individual and is collected during the provision of a health service to the individual such as:

- demographics, registration, residency, health service eligibility or billing information
- diagnostic, treatment and care information

Personal Information - means recorded information, not including health information, about an identifiable individual including, but not limited to, name, home address or contact information, race, ethnic origin, gender, marital status, educational/ financial/ employment/criminal history, and opinions of others about the individual.

Relevant Policy and Policy Support Documents:

A. Policies:

Covenant Health Corporate Policies:

- II-20, Discipline and Termination
- X-15, Access to Personal or Health Information by Individuals
- X-20, Collection and Use of Personal or Health Information
- X-10, Confidentiality Agreement and Privacy Training
- X-25, Contractor Requirements for Security of Information and IT Resources
- X-30, Correction of Personal or Health Information
- X-35, Disclosure of Personal or Health Information to Third Parties
- X-40, Information Privacy Breach or Information Systems Security Incident Response
- X-45, Information Security Classification
- X-50, Information Technology Acceptable Use and Safeguards
- X-5, Privacy Accountability
- X-55, Privacy Impact Assessments and Monitoring
- X-60, Transmission of Personal or Health Information
- X-65, Transportation of Personal or Health Information

Information and Privacy Resources <http://www.compassionnet.ca/Page1507.aspx>

B. Procedures:

N/A

C. Guidelines:

N/A

D. Job aids:

N/A

E. Standards:

N/A

Key words:

References:

Freedom of Information and Protection of Privacy Act

FOIP Guidelines and Practices, 2009

<http://www.servicealberta.gov.ab.ca/foip/resources/guidelines-and-practices.cfm>

Health Information Act

HIA Guidelines and Practices Manual, March 2011

<http://www.health.alberta.ca/documents/HIA-Guidelines-Practices-Manual.pdf>



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Past Revisions: July 2014