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

### Policy Statement
Covenant Health ensures that all staff and other individuals acting on behalf of Covenant Health have sufficient awareness to protect the privacy and security of the 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.

### 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
1. Every staff member, physician, volunteer, student or other person acting on behalf of Covenant Health is responsible for taking appropriate action to comply.

2. Management staff, particularly those responsible for selecting, hiring, granting privileges, or supervising personnel shall inform those personnel of this policy, the related privacy training requirements and the information management policies describing the administrative, technical and physical safeguards for the protection of personal and health information.

### Principles
1. Personnel shall maintain in strictest confidence any and all 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.

2. Collection, use and disclosure of personal 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.

3. 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.

**Procedure**

1. Upon appointment to Covenant Health, or to a new position within the organization, all personnel must sign a confidentiality agreement acknowledging their understanding and agreement to comply with their obligations for properly handling and protecting personal and health information and the rules for accessing the Covenant Health information systems.

   1.1. Employees and students must sign the Confidentiality and User Agreement posted on CompassionNet at [http://www.compassionnet.ca/Page1507.aspx](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](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 (e.g. clinical assistants, midwives) will sign a confidentiality agreement as established by Medical Affairs.

   1.4. Other individuals acting on behalf of Covenant Health will be required to sign a Confidentiality Agreement appropriate to the services being provided to Covenant Health.

2. Signed confidentiality agreements will be maintained in the individual’s personnel file, Medical Affairs file, or Volunteer Services file. Post secondary academic or training institutions are responsible to retain the agreements signed by students in accordance with institution’s Student Placement Agreement.

3. When required to do so, the confidentiality agreement shall be updated and re-signed.

4. Where a collective agreement varies from the provisions of this policy, the collective agreement shall prevail.

5. Immediate supervisors shall inform their personnel of the:

   5.1. requirements for confidentiality

   5.2. methods for safeguarding information and the information technology resources

   5.3. requirements for completing information privacy and security awareness training

6. Personnel are responsible to complete information privacy and security training relevant to their position and job duties in accordance with Covenant Health’s education plan.

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

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.

**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.

**Related Documents**

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](http://www.compassionnet.ca/Page1507.aspx)

**References**

*Freedom of Information and Protection of Privacy Act*
FOIP Guidelines and Practices, 2009

*Health Information Act*

**Revisions**
N/A