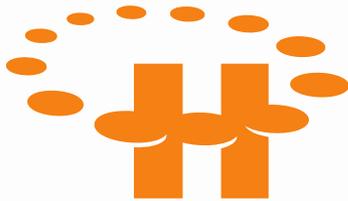


# *Tales of a Privacy Breach*

*from the Hamilton  
Family Health Team*

**AFHTO 2017**



**Hamilton** Family Health Team

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## ***Presenter Disclosure***

- Presenter: Vanessa Foreman
- Relationships with commercial interests:
  - Grants/Research support: none
  - Speakers Bureau/Honoraria: none
  - Consulting fees: none
  - Other: none



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## ***Disclosure of Commercial Support***

- This program has not received any financial support
- This program has not received any in-kind support

## ***Potential for Conflicts of Interest***

- I have not received funding from any organizations supporting this program or being discussed in this program
- There will be no specific products or programs discussed in this program



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## ***Presentation Overview***

- Who we are and our privacy practices
- Our experience with a significant privacy breach
- Key learnings – what you should know!



# Who We Are

- Formed in 2006
- Largest FHT in Ontario: 165 physicians in 14 FHOs



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***PHI =  
Personal Health  
Information***

***IPC =  
Information  
and Privacy  
Commissioner***

# ***Protecting Privacy: A Multifaceted Approach***

- Organizational Policies and Sign-Off
- Alignment with College/IPC Policies



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# ***Protecting Privacy: A Multifaceted Approach***

- Staff & Patient Education
- Physical & Cyber Security - Regular Audits
- Quarterly Reports to the Board of Directors

# ***EMR Audits***

- Step-by-Step Guides
- Interpretation of results
- Recording of activity



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A close-up of a light-colored teddy bear with a pink ribbon around its neck. The bear has a sad expression, with slanted eyes and a downturned mouth. A red speech bubble is positioned to the right of the bear's head, containing the text "Oh no!".

Oh no!

***One of our practice teams  
ran an audit and...***

***Privacy Breach!***



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## ***What Happened***

- A retired physician (Dr. A) remotely accessed former patient files after turning over practice to a new physician (Dr. D)
- 204 patient files were accessed
- Previous College complaint



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## ***Our Response***

- Communicate with IPC, FHO Lead, OMA, lawyers
- Further exploration/containment of breach
- Notification of patients



## ***Key Learnings: Communication***

- Have a media relations strategy
- Internal messaging is as important as external messaging
- You need a small but reliable circle
- Take precautions before sharing any further info



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## ***Key Learnings: Supporting Patients***

- Patients need clear instructions
- Offer clinical support



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## ***Key Learnings: Prevention***

- Have an in-depth practice turnover checklist
- Regular senior leadership involvement in privacy
- Select the best EMR for auditing and strategize how
- Disciplinary measures



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## ***Final Messages:***

- Create a safe space
- Foster positive interest, not fear
- Privacy compliance is for teams of all sizes



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***Thank you!***

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