



Partnering for Lifelong Health

Clinton

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Family Health Team

## Privacy Audit Policy

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### Intent

Protecting the privacy and confidentiality of personal information is an important aspect of the way Clinton Family Health Team conducts its business. The collection and maintenance of personal information in an appropriate, responsible, and ethical manner is fundamental to Clinton Family Health Team's daily operations.

Clinton Family Health Team will conduct privacy audits every month, reviewing at least five patient charts.

### Guidelines

#### Applicability

This Privacy Audit Policy informs everyone of Clinton Family Health Team's commitment to privacy and establishes the methods by which privacy audits are conducted. This Privacy Audit Policy applies to all personal information within Clinton Family Health Team's possession and control.

Personal information is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as Clinton Family Health Team, business address, business telephone number, name(s) of owner(s), executive officer(s), and director(s), job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

#### Procedures

Privacy audits are an internal function of Clinton Family Health Team. The purpose of the audit is to provide Clinton Family Health Team with a review of access to five patient charts each month. The audits will be done by the Privacy

Officer by reviewing the transaction log of a patient chosen at random. If there is access to a patient chart that is questionable, the Privacy Officer will interview the person accessing the record. Any Clinton Family Health Team employees interviewed in the auditing process will be instructed that there are no right or wrong answers to questioning, and that any information they provide will be held in confidence on a need to know basis. The Clinton Family Health Team will follow the Privacy Breach Protocol for any breaches found in the audit.

The privacy audit will examine Clinton Family Health Team's information management policies, as well as any existing records in hardcopy, computerized databases, online storage facilities and any other media with regards to patients, employees, physicians, contractors etc.

Clinton Family Health Team will document and analyze why personal information has been collected as well as who has access to that information and for what purposes they have been granted that access in order to ensure that Clinton Family Health Team information management practices comply with relevant privacy legislation.

The privacy audits will be conducted by Clinton Family Health Team Privacy Officer.

Any questions or concerns regarding this Privacy Audit Policy can be addressed by contacting us at phone: 519-482-3000, fax: 519-482-7648, email: [kim.vanwyk@clintonfht.ca](mailto:kim.vanwyk@clintonfht.ca) .

Clinton Family Health Team will investigate and respond to concerns about any aspect of the handling of personal information. This organization will address concerns to the best of its abilities.

Approved by the Board: January 14, 2016