

## **Privacy Safeguards Policy**

*Note: We refer throughout to the Village Family Health Team (VFHT) and staff and agents– but this policy applies to all Queen West Family Health Organization (FHO) members and staff equally. The FHO is the health information custodian for purposes of the Personal Health Information Protection Act (PHIPA), and VFHT acts as its agent for purposes of PHIPA.*

**Purpose:** *The Personal Health Information Protection Act, 2004* requires health information custodians to protect personal health information in their custody or control and to ensure that records are retained, transferred and disposed of in a secure manner. The purpose of the following policy is to highlight some important safeguards to ensure the protection of patient’s personal health information at the Village Family Health Team.

### **Policy:**

#### ***Emailing***

All staff must ensure that a secure email account is used when disclosing any patient’s personal health information (e.g. Exchange). In addition, attached documents with personal health information must be encrypted and all emails should contain a standardized stamp outlining that the information within them is private and confidential (refer below). Finally, emails with patients should be avoided and rather Wellx messaging employed given most patients do not have secure email accounts.

- Email stamp example: “Private and Confidential – This electronic transmission may contain confidential information only intended for the person(s) named above. If you have received this email in error, please notify our office at 416 599 8348 ext 8024 and delete this email without forwarding it or making a copy of the email or any attachments.”

#### ***Texting***

All staff should refrain from texting about patients.

#### ***Logging off EMR***

All staff are responsible for logging off the electronic medical records when leaving their worksite for a prolonged period of time. When briefly leaving a worksite (e.g. when leaving an examining room to get a patient) all staff must lock their computers to ensure no personal health information is inadvertently disclosed.

#### ***Personal Health Information in Accessible Areas***

All staff must avoid leaving documents containing patient’s personal health information in accessible areas. Signage must be used to designate accessible areas as “private” to avoid unintentional disclosure of information. Within examination rooms it is the responsibility of staff members to remove documents containing personal health information and place them out of sight (e.g. in drawers) throughout business hours. At the end of the day all documents must be secured behind double locks.