

CENTRAL WEST LOCAL HEALTH INTEGRATION NETWORK (LHIN)  
Policy And Procedure Manual

Policy Number	Category	Policy Title	Date Adopted	Review Schedule
	Human Resources	Confidentiality Policy	Senior Management Review: Jun 24, 2019 Senior Management Approval: Jun 24, 2019	Every three (3) years
Issue Date:	01/01/2007		Review Date: Jun 24, 2019	
Scope:	All Employees		Next Review: Jun 24, 2022	

## I POLICY STATEMENT

- 1.1 Central West LHIN is committed to protecting the privacy of all information maintained by the organization. Confidentiality is the cornerstone of the trust placed in all facets of the organization by patients, staff and volunteers.

## II PURPOSE

- 2.1 The Central West Local Health Integration Network is entrusted with a variety of confidential information concerning its patients, customers, service providers and employees. This policy outlines the requirement to ensure the confidentiality of this information is maintained.

Note: The Public Service of Ontario Act (PSOA), 2006, provides the ethical framework for all public servants. This is separate and apart from the organizational Confidentiality Policy and Agreement. The PSOA framework includes:

- Oath or affirmation of office
- Oath or affirmation of allegiance
- Conflict of interest
- Political activity rights and restrictions
- Disclosure of wrong doing
- Identified ethics executive

## III DEFINITIONS

- 3.1 Confidential information includes, but is not limited to the following:
- Patient records and information;
  - Employee, student and volunteer personnel information;
  - Board related information;
  - Financial information;
  - Business plans and strategies; and,
  - Other information identified as confidential by management.

## **IV GENERAL**

- 4.1 In the course of any role at the Central West LHIN, an employee, contractor, student, or volunteer may become aware of confidential information. The Central West LHIN requires each individual to maintain the confidentiality of such information.
- 4.2 Confidential information about the Central West LHIN, its patients, customers, service providers or employees should not be disclosed to anyone inside or outside the LHIN, other than to persons who are authorized to receive such information in order to fulfill their responsibilities, or to comply with relevant legislation.
- 4.3 When an individual is in doubt about whether information is confidential, or whether it may be disclosed to the person requesting it, no disclosure should be made without first seeking guidance from his/her manager.
- 4.5 Every employee, student, contracted role and volunteer will be provided with a copy of the Confidentiality Policy and will be required to sign a Confidentiality Agreement on or before their first day of work. The original signed copy will be placed on the person's employee/student/volunteer file and they will be provided with a copy of their signed agreement for their own records.
- 4.6 Every employee, student, contracted role and volunteer will be required to read and acknowledge Confidentiality Policy and Confidentiality Agreement on an annual basis. This will be done electronically through the Learning Management System (LMS).
- 4.7 A violation of this policy and agreement may result in disciplinary action including, but not limited to, written warnings, suspensions with or without pay, and/or immediate termination of employment with Central West LHIN; and prosecution under the law.

## **V RESPONSIBILITY**

- 5.1 Employees
  - Read and acknowledge the Confidentiality Policy at time of hire
  - Read and sign in hard copy the Central West LHIN Confidentiality Agreement at time of hire
  - Read and acknowledge the Confidentiality Policy and Confidentiality Agreement annually in an electronic form
  - Adhere to the outlined policy and confidentiality agreement and ensure that the appropriate authorizations are in place prior to sharing any confidential information;
  - Ask for clarification from a manager if unsure how to handle requests for confidential information.

5.2 Manager

- Orient staff on the proper handling of confidential information;
- Notify/consult the Privacy Officer and Human Resources of any breaches of confidentiality;

5.3 Human Resources

- Investigate and provide advice to managers on how to handle breaches of information;
- Review the policy and recommend changes for improvement.
- Support the requirement for annual acknowledgement

5.4 Privacy Officer

- Investigate and provide guidance on how to handle breaches of confidentiality as per the Privacy of Patient Health Information policy and Privacy Breach Management Procedure

**VI ASSOCIATED DOCUMENTS**

- Central West LHIN Confidentiality Agreement
- Privacy of Patient Health Information Policy
- Privacy Breach Management Procedure
- Privacy Breach Sanction Guidelines

**VII REFERENCE**

- Director, Human Resources
- Privacy Office
- Ontario Nurses' Association, ONA Members and Patient Privacy: Be Aware and Beware, January 2016
- Information and Privacy Commissioner of Ontario, Detecting and Deterring Unauthorized Access to Personal Health Information, 2015

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CEO

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Date