



Shared health
Soins communs
Manitoba

Privacy for New Managers

Organization & Staff Development
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Who we are

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- Chief Privacy Officer
- Shared Health

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- Manager, Privacy
- Shared Health, Digital Health

Perceptions of Privacy

What does it mean to you?

Relationship Status: its complicated



Consider this....

You have an employee on an extended sick leave and your staff are asking questions about how they are doing....

- ✓ Seeing posts on social media
- ✓ Rumors through the grapevine
- ✓ Spotted at a hospital



- Can't share information you know without consent
- Discourage sharing rumors



Consider this....

You overhear another manager talking about a colleague who recently had surgery.

The manager has lots of intimate details and is sharing them freely.....



- May not be a breach
- Consider policy
- Not in keeping with good privacy practice



Manitoba Privacy Legislation

PHIA

The Personal Health Information Act (PHIA)

FIPPA

The Freedom of Information and Protection of Privacy Act (FIPPA)



The Personal Health Information Act

PHIA

Rights of Individual

- Access, Correction, Privacy, Confidentiality, Challenging Compliance

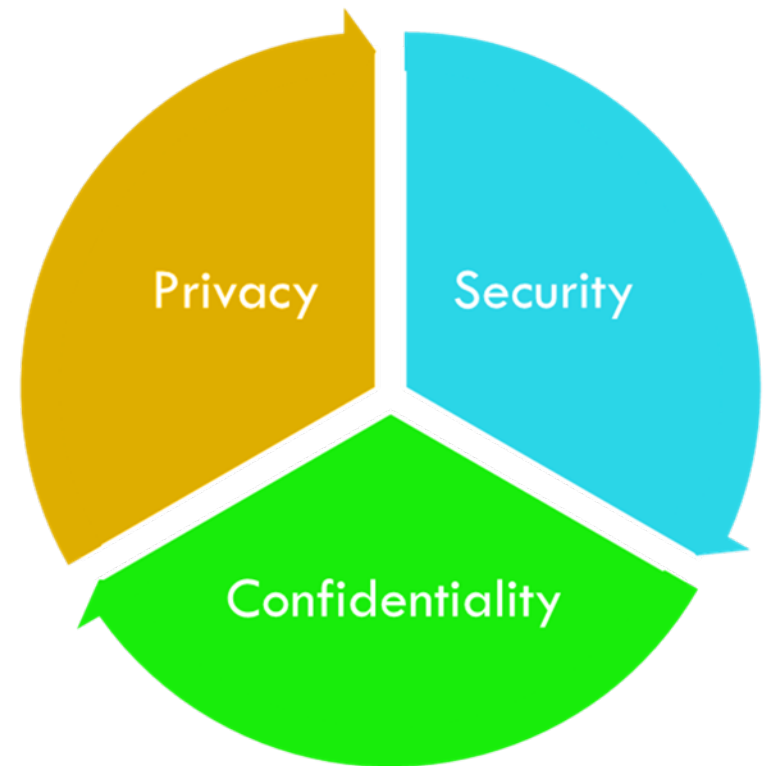
Responsibilities of Trustees

- Policies and Procedures, Audits, Education, Accountability (internal and external)

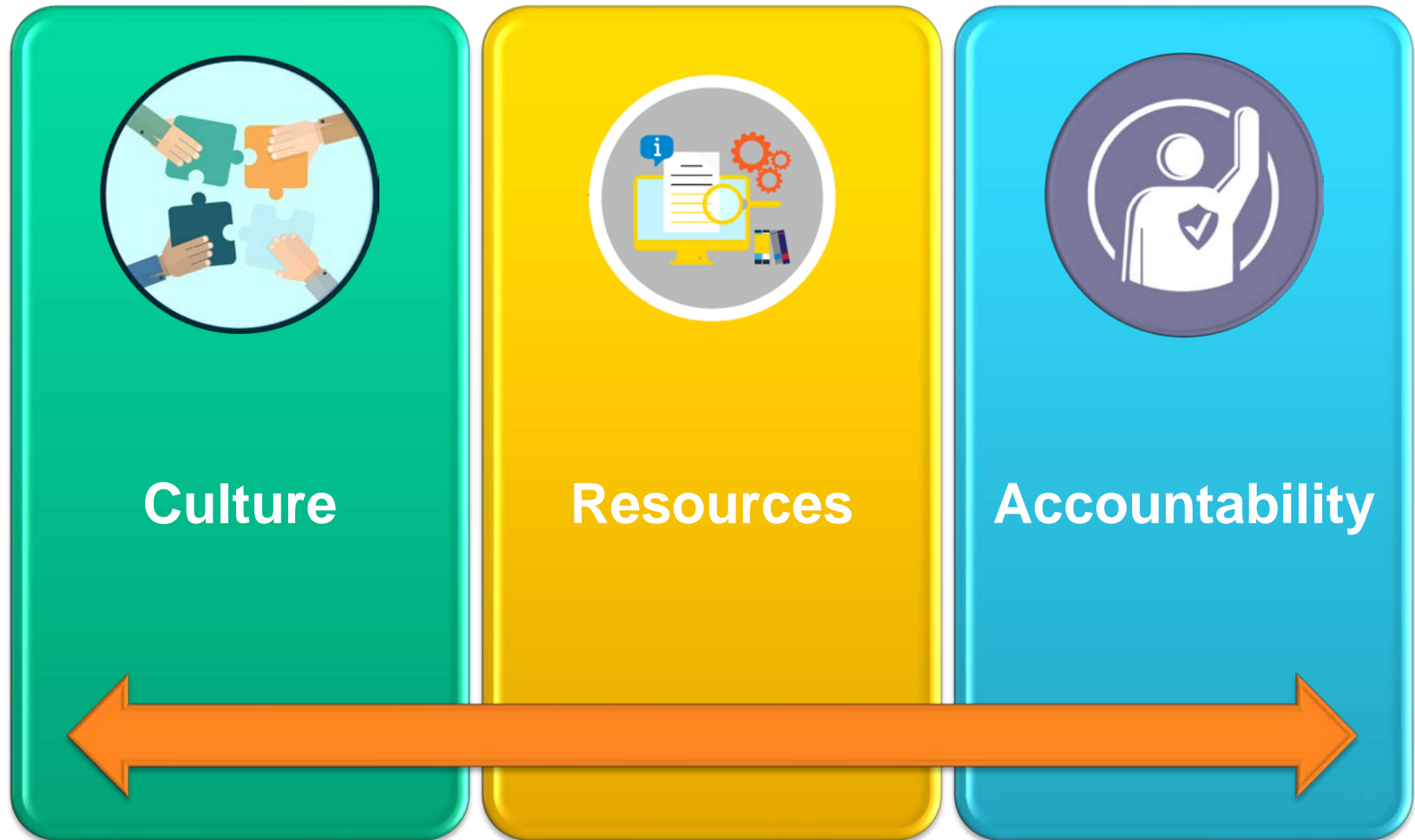
An Essential Part in Ensuring Best Practices in Patient Centered Care

Trustee's Responsibilities

- Individuals have an expectation that the Trustee will protect the privacy, confidentiality and security of the personal health information they have shared.
- It is the responsibility of all employees to hold all personal health information in the highest confidence.



Privacy and the Role of Manager



Culture of Privacy



LEADERSHIP

MODELING

RULES & REGULATIONS

EDUCATION

COMMUNICATION

Resources

- ✓ **Shared Health | Privacy and Security webpage**

- ✓ The legislation
- ✓ PHIA policies, guidelines and forms
- ✓ Contact information & Privacy Officers



- ✓ **Shared Health | Staff Resources | Security**

- ✓ Email
- ✓ Passwords
- ✓ Portable Devices (e.g. Smart phones, USB Keys)



- ✓ **WRHA Access & Privacy webpage**

- ✓ **Human Resource Policies (discipline)**

Accountability



- ✓ **Add/Delete/Modify Form** (for new staff or those leaving the organization)

- ✓ **Education**
 - ✓ PHIA Training & Re-Training
 - ✓ PHIA Pledge
 - ✓ Security Training Course
 - ✓ Reinforce during staff meetings

- ✓ **Electronic Information Systems**
 - ✓ Systems Access
 - ✓ Strong Passwords
 - ✓ Ensuring Log off when not in use

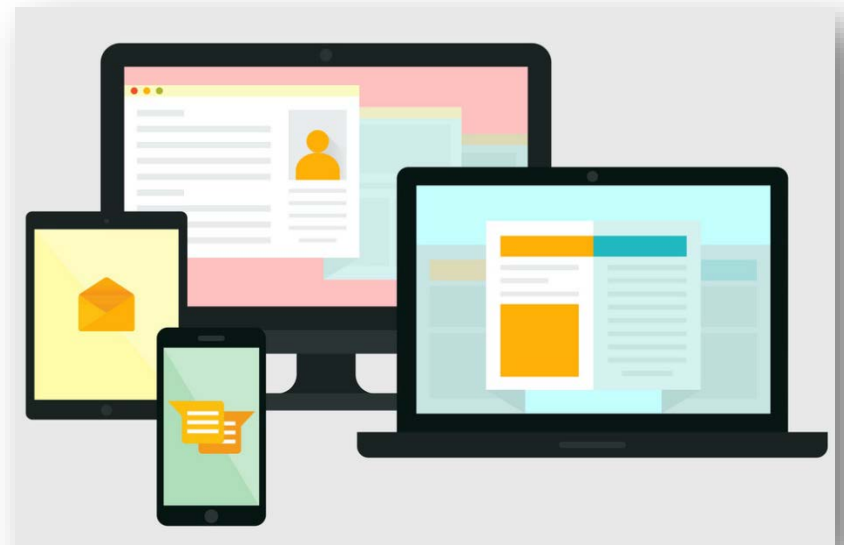
	PROACTIVE	REACTIVE
ADMINISTRATIVE	<ul style="list-style-type: none"> Legislation Policies, Guidelines, Pledges Auditing PIAs 	<ul style="list-style-type: none"> Discipline
TECHNICAL	<ul style="list-style-type: none"> Passwords Encryption Firewalls Role Based Access Audits 	<ul style="list-style-type: none"> Auditing Records of User Activity
PHYSICAL	<ul style="list-style-type: none"> Locked doors Swipe cards Designated Secure Areas PC Placement 	<ul style="list-style-type: none"> Policy / Security Review



Privacy in Practice

Mobile Devices

- Cell phones
- Laptops
- Tablets
- Portable Drives
- USBs/Flash drives



YOU SHOULD REQUEST THAT ANY MOBILE DEVICES BE RETURNED WHEN AN EMPLOYEE GOES ON A LEAVE (MATERNITY, EXTENDED SICK, ETC.)

Privacy in Practice



Proactive Auditing

- Routine / Random
- Same Name
- Persons of Interest
- Individual Requests

Reactive Auditing

- Site Requested
- Investigation

Privacy Challenges

- Email
- Messaging Apps
- Personal Devices
- Social Media
- Web Based File Hosting Services (e.g. iCloud, Dropbox)



One of your staff is excited with their new workspace and took a few selfies at their desk then posted them to Instagram.



- Is this a breach of privacy?
- Is this a breach of policy?

- ✓ Audio Video & Photographic Recordings
- ✓ Reporting & Investigating Privacy Breaches and Complaints
- ✓ HR Discipline policies



You receive a call from a member of the public reporting an envelope with the Shared Health logo was left at a bus stop. The envelope is stamped “confidential”.



- Is this a breach of privacy?
- Should I notify the individual?
- ✓ Reporting & Investigating Privacy Breaches and Complaints
- ✓ Privacy Breach Investigation Process Chart

You learn that one of your staff has been accessing the health information of a very ill family member in an electronic health record system.

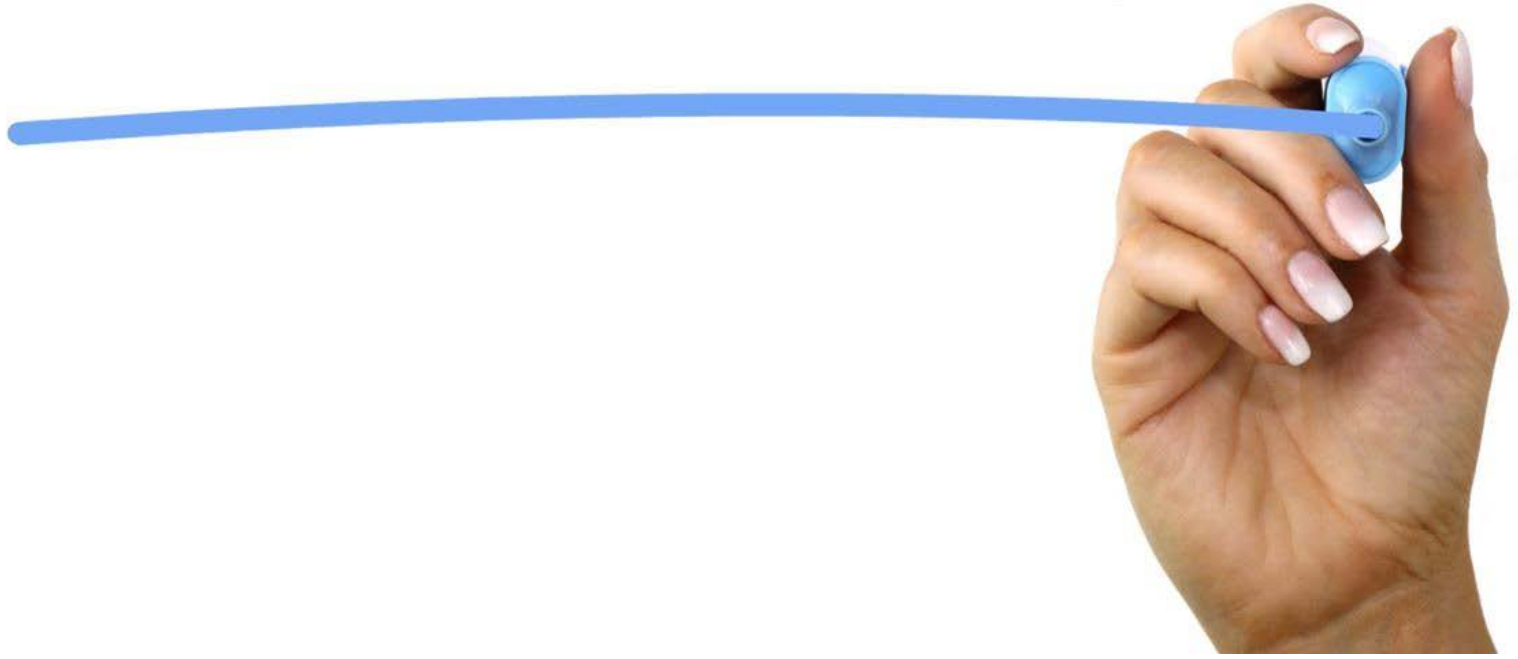


- Is this a breach of privacy?
 - Request audits of user's activity in system
 - Should I notify the individual?
-
- ✓ Reporting & Investigating Privacy Breaches and Complaints
 - ✓ Privacy Breach Investigation Process Chart
 - ✓ HR Policies - discipline

Know your Privacy Officer



QUESTIONS



THANK YOU !