



# Family Medicine-Primary Care Program Privacy Learning Summary

Occurrence Reporting Summary  
Quarter 3 – Fiscal 2012/13

## Category:

### Summary - What happened?

- All clinic staff signed the Terms of Use for e Chart when they were trained prior to go-live. All clinic team members had signed the WRHA confidentiality pledge.
- 8 months later the WRHA Privacy Officer responded to an e Chart Manitoba Privacy random audit of site user activity by reviewing “User Activity Report” in conjunction with appropriate staff to identify irregularities. The WRHA Privacy Officer then completed the e Chart Manitoba “User Activity Audit” form and returned to e Chart Manitoba Privacy Analyst by the defined date.
- The e Chart Manitoba Privacy Analyst provides notification of the breach incidents to the WRHA Privacy Officer. The WRHA Privacy Officer then notifies the appropriate supervisor and is required to report to e Chart Manitoba Privacy Analyst results of the investigation of any incident.
- Multiple breaches were identified and redirected to the appropriate supervisor. WRHA Human Resources, Legal and the Chief Privacy Officer were all consulted for the remedial action to be taken.
- The WRHA Privacy Officer is also required to provide additional information to e Chart Manitoba on any remedial action taken, e.g. privacy policies training review, notification of individual impacted, etc.

### What were the review findings?

- Individuals identified were using their own login privileges to e Chart to access their own personal health information and bypassing the proper process to request e Chart to complete the access for information form that was part of their original e chart training.

### What was recommended?

- One of the recommendations was to highlight the e Chart educational materials for Primary Care clinic teams to review as learning opportunities around access, use and disclosure in e-chart that would be shared across all sites.

### Factors identified as potential areas for system improvement:

- Spread Lessons learned broadly across Family Medicine Primary Care sites on how all clinic team members who are wanting to access e Chart for personal use are to complete [e Chart Manitoba Access Form](#) and ensure they understand the [e Chart Manitoba Terms Of Use](#).
- **e Chart Extranet site:**  
Link to on line e Chart Privacy <http://services.manitoba-ehealth.ca/privacy.html>  
Link to online e Chart Fundamentals course: <http://services.manitoba-ehealth.ca/echartTrainFund.html>
- **Refresher on Privacy, Confidentiality and Information-sharing Service Module:**  
[Highlights before you have signed](#)  
[Highlights after you have signed](#)
- [e Chart Manitoba Privacy Lesson 101 #1](#)

***Other lessons outside of this incident for further discussion with clinic teams:***

[e Chart Manitoba Privacy Lesson 101 # 2](#) & [e Chart Manitoba Privacy Lesson 101 #3](#)

**Media examples of Privacy Breaches:**

[Manitoba Ombudsman](#) (go to Annual reports 2012)

[CBC News Canada Manitoba Health Worker caught Snooping](#)

[CBC News Canada Newfoundland-Labrador Massive Breach at 2nd Newfoundland Health Authority](#)