

Health and Social Services Mandatory Training Policy

Policy Statement

Mandatory training with consistent messaging is necessary to ensure that the concepts of confidentiality and privacy are clearly understood by all those who work in and for the health and social services system.

Scope

This Policy applies to:

- 1) All employees of the Department of Health and Social Services (Department) and the Health and Social Services Authorities (HSSAs).
- 2) Volunteers, contractors and information managers of the Department and HSSAs who may access confidential, personal and/or personal health information.

Definitions

The following terms apply to this Policy:

“Confidential information” is non-public information that is only shared with a limited number of individuals for a specific purpose. Examples of confidential information include, but are not limited to:

- Personal information about clients (such as child protection, adoption, medical records, documents obtained for public health surveillance purposes, etc.)
- Personal information about employees (such as performance appraisals, medical notes, labour relations documentation, etc.)
- Legal opinions
- Decision papers and other material intended for Cabinet or the Financial Management Board
- Any information that, if disclosed, may result in harm to the Government of the Northwest Territories (GNWT) or other interests.

“Employee” for the purpose of this Policy means all individuals employed by the Department or HSSA including salaried, contracted or locum health practitioners and individuals whose positions are federally funded.

“Health and Social Services Authorities” refers to the Northwest Territories Health and Social Services Authority and Boards of Management under the *Hospital Insurance and the Health and Social Services Administration Act*.

“Information manager” means a person or organization that provides one or more of the following services for the Department of HSSA:

- (a) the processing, storage, retrieval or disposal of personal health information,
- (b) the transforming of personal health information, including the transforming of person health information to create or produce non-identifying information,
- (c) information management services, information system services or technology services.

“Personal information” means information about an identifiable individual, including

- (a) the individual's name, home or business address or home or business telephone number,
- (b) the individual's race, colour, national or ethnic origin or religious or political beliefs or associations,
- (c) the individual's age, sex, sexual orientation, marital status or family status,
- (d) an identifying number, symbol or other particular assigned to the individual,
- (e) the individual's fingerprints, blood type or inheritable characteristics,
- (f) information about the individual's health and health care history, including information about a physical or mental disability,
- (g) information about the individual's educational, financial, criminal or employment history,
- (h) anyone else's opinions about the individual,
- (i) the individual's personal opinions, except where they are about someone else.

“Personal health information” means information in any form that identifies an individual, or in respect of which it is reasonably foreseeable in the circumstances that the information could be used, either alone or with other information, to identify an individual:

- (a) information about the health and health care history of an individual,
- (b) information respecting health services provided to an individual,
- (c) information about eligibility or registration of an individual for a health service or related product or benefit,
- (d) information about the payment for a health service for an individual,
- (e) information collected in the course of providing a health service to an individual or information that is collected incidentally to the provision of a health service to an individual, including the individual's name and contact information,

- (f) a personal health number, other identifying number, symbol, or other particular assigned to an individual in respect of health services or health information,
- (g) prescribed information about a health service provider that provides a health service to an individual,
- (h) information respecting the donation by an individual of a body part or bodily substance,
- (i) information prescribed as personal health information in the Health Information Regulations.

Provisions

- 1) Immediate supervisors must ensure employees, contractors, volunteers and information managers complete the appropriate level of mandatory training in accordance with Appendix 1.
- 2) Specific training material developed by the Department must be used.
- 3) Mandatory training must be completed:
 - a. Within 3 months of the employee's start date
 - i. for new employees
 - ii. for returning employees with no privacy training in the past year
 - b. Annually
 - i. for all employees, contractors, volunteers and information managers.
- 4) Completed mandatory training must be tracked and documented:
 - a. The employee's immediate supervisor must keep a record of training attendance.
 - b. The Department and HSSAs must also maintain a central record of attendance for the training of all employees, contractors, volunteers and information managers.
- 5) Requirement to obtain specific training to comply with confidentiality and privacy provisions under the *Child and Family Services Act* and *Mental Health Act*, and specific e-system application training, continue to apply notwithstanding this Policy.

Exception

This Policy does not apply to contractors and information managers if their privacy and security policies, procedures and safeguard measures align with the Department and HSSA policies and procedures.

Authority and References

Access to Information and Protection of Privacy Act

Child and Family Services Act

Health Information Act

Mental Health Act

Ministerial Directive 2016-02: Privacy Standards, Policies and Standards

Contractor Compliance Policy



Deputy Minister

Date *May 3, 2017*

Mandatory
Mandatory Duties Dependent
Optional

Privacy & Confidentiality Training Modules
Overview by Job Area

JOB AREA with Information Handling	Handling general information ONLY (<u>not</u> handling personal and/or personal health information)	Handling personal information	Using electronic information system(s) with personal information	Handling personal health information	Using electronic health information system(s)	Records management / access request processing	Quality Risk Management	Responsible for HIA legislative compliance
TRAINING MODULES	General Privacy and Confidentiality	General Privacy and Confidentiality	General Privacy and Confidentiality	General Privacy and Confidentiality	General Privacy and Confidentiality	General Privacy and Confidentiality	General Privacy and Confidentiality	General Privacy and Confidentiality
	Optional: <ul style="list-style-type: none"> • Research • Health System Planning • Privacy Impact Assessment • 'Privacy by Design' Privacy Req'ts for new projects • Privacy Brown Bag Lunches on policies, tools, best practices 	Respecting Patient/Client Privacy	Respecting Patient/Client Privacy	HIA Overview	HIA Overview	HIA Overview	HIA Overview	HIA Overview
		Privacy Safeguards	E-Privacy (admin or user)	Respecting Patient/Client Privacy	Respecting Patient/Client Privacy	Respecting Patient/Client Privacy	Respecting Patient/Client Privacy	Respecting Patient/Client Privacy
		Privacy Safeguards	Privacy Safeguards	Privacy Safeguards	Privacy Safeguards	Privacy Safeguards	Privacy Safeguards	
		E-Privacy (admin or user)	Access & Correction	"Incident Investigation" & Privacy Breach	"Incident Investigation" & Privacy Breach			
		Complex Consent	Complex Consent	Access & Correction				
		HIA Designated Contact Person Responsibilities						
		Complex Consent						
		Train the Trainer & Refresh						