

SAMPLE INFORMATION MANAGEMENT SYSTEMS POLICY

PURPOSE

To establish the First Nations Health Organization's policy regarding collection of data, access to files/data, maintenance and protection of data.

POLICY

The First Nations Health Organization data/information shall be collected through either, manual use of log books, meeting minutes, workshop session reports, monthly and annual summary reports or an electronic medical record system to track ongoing health utilization data.

The First Nations Health Organization Health shall maintain the necessary policies and procedures related to the release of medical information, access to information, client access to personal records, and breach of confidentiality of medical records.

The First Nations Health Organization Health is committed to protecting its clients' individual privacy and safeguarding the personal health information in its possession. The utilization, disclosure and retention of medical records shall be in accordance with applicable federal and provincial privacy laws and policies.

The First Nations Health Organization shall ensure the information of past and present clients and employees' files are safe and kept confidential. And that all electronic and physical files and data will be protected from unauthorized access, theft, and destruction by fire, water, loss, corruption, power failure and other damage.

Files shall not leave the office. To keep information confidential only the Director of Health, Unit clerk and Nurses have access to client files. Files are to be locked in the filing room at the end of each day.

POLICY APPLICATION

1. Collection: Employees shall collect pertinent data from clients on a regular basis and maintain the following types of records:
 - a) Individual Client Records
 - b) Aggregate Client Records/Health Information
 - c) Attendance Records
 - d) Qualitative Feedback from Participants
2. Access: As per policy clients have the right to control who has access to their personal health information and how it will be used. The right to privacy is protected by a number of federal and provincial laws, policies and guidelines, in which the First Nations Health Organization will comply. Procedures for corrections to information currently on file and responding to requests for access by former employees and for current and deceased clients are to be followed on all access matters.
3. Confidential: All documents, record, employee files and other information in the possession of the First Nations Health Organization shall be treated as confidential information and shall not be disclosed except to authorized individuals. Authorized individuals in this section means those individuals approved in writing by the Director of Health. Confidential information includes, but is not limited to: Client and Band membership information; self-government plans, strategies and information; statistics and research data; criminal offender information; personal files; software;

financial information, reports and other confidential data.

4. Storage of Files

Client

- a) Files for current clients are kept in the file room in client charts and file room door is locked when not occupied.
- b) The First Nations Health Organization clients have the right to control who has access to their personal health information and how it will be used. The right to privacy is protected by a number of federal and provincial laws, policies and guidelines, in which the First Nations Health Organization will comply.
- c) Files are stored for seven (7) years.
- d) Records and files will be shredded and burned.

Personnel

- a) Only the Director or Health will have unlimited access to the personnel files. Any changes in personnel data should be reported to keep files up-to-date.
 - b) Personnel files are kept in the office in a locked filing cabinet.
 - c) Files are stored for seven (7) years.
 - d) Records and files older than seven (7) years will be shredded and burned.
5. Protection: The following practices shall be followed:
- a) The First Nations Health Organization employees shall ensure filing cabinets containing confidential files or related information is locked at all times;
 - b) All the First Nations Health Organization computers have up-to-date anti-virus protection;
 - c) Secure protocols, including the use of passwords and firewalls which govern the electronic collection and transfer of sensitive data; and
 - d) Regular backup of all electronic records, which are preferably stored off-site.