

	Name of Manual: HEALTH INFORMATION MANAGEMENT AND PRIVACY	Number: 4-b-120
	Section: PRIVACY AND CONFIDENTIALITY: PROTECTION OF PERSONAL HEALTH INFORMATION	
	Name: SECURE TRANSFER OF CONFIDENTIAL INFORMATION BY MAIL, COURIER OR IN PERSON	Page: 1 of 6

PURPOSE

To provide a consistent approach for the secure transfer of confidential information, internal or external to Central Health, by mail, courier or in person.

POLICY

The transfer of personal information, personal health information and confidential business information of Central Health (hereinafter referred to as information) between and within Central Health's departments, programs and facilities; among health care service providers, employees; its agents and affiliates; and to clients of Central Health must be performed in a safe and secure manner relative to the level of sensitivity and degree of identifiability of the information.

All administrative arrangements for the receipt and sending of information must be performed:

- in the most secure manner relative to the sensitivity of the information;
- by authorized personnel only;
- on a "need-to-know" basis; and
- in the most cost-effective means relative to the sensitivity of the information.

Central Health's approved modes of transferring information in physical format are:

- Central Health's internal mail system,
- external post office and outlets,
- Central Health's authorized external courier, or
- in person, as authorized.

Every individual of Central Health is accountable to ensure an approved and secure method of transfer of information is used relative to the sensitivity and time constraints of the information.

All copies of information are subject to the same protection and security controls as original media.

Original client records are **NOT** to be transferred outside of a Central Health facility except in accordance with organizational and/or department/program policies, or as otherwise required by law.

Where the transfer of an original client record outside of a Central Health facility is required, the individual must obtain approval from the manager/director of the department/program, senior leader and/or the Director of Health Information Management & Privacy. Only the minimal amount of the original client record for the required purpose is to be transferred. A copy of the original client record or the required portion of the original client record must be retained on the client's permanent record at the Central Health facility.

The authorized employee transferring the original client record must place information in a locked briefcase or other secure means for transfer. The authorized employee must ensure the information is secured at all times. Information being transferred must be hand delivered to the recipient. All efforts must be made to ensure the secure transfer and integrity of the information. The original client record must be returned following the required purpose.

Delivery of an original client record(s) to a requestor within a Central Health facility (i.e. outpatient clinics, nursing units, other departments/programs) must be by hand delivery. Safeguards must be taken to ensure the client's name is not visible during transfer.

When determining the appropriate means of transferring information, an individual must assess the sensitivity of the information to determine the appropriate method of transfer with reference to their department/program policies and practice standards, where applicable.

Any incomplete or misaddressed mail received by Central Health's departments/programs must be immediately redirected to the Health Information Management and Privacy Department or an individual delegated by the Director of Health Services or department/program manager/director within the Central Health facility for appropriate redistribution in a timely manner. Information must be assumed to be private in nature until verified otherwise by delegated receivers.

In the event an individual is aware that information is misplaced, misdirected or any seal is significantly disturbed, the completion of an occurrence report is required as per Central Health's Occurrence Reporting process.

Guidelines for transferring information by internal mail and external to Central Health through regular Canada Post or by an approved external courier:

1. All information considered confidential in nature must be transferred in a securely sealed envelope/package addressed to a specific recipient with the complete mailing address of the recipient. Complete mailing address of the recipient includes: recipient's name, department/facility where applicable, PO Box or street number/name, community/town and postal code.

2. The envelope/package must be robust to withstand transit and be sealed in such a way that it cannot be opened without it being obvious that tampering has occurred.
3. A complete return address of the sender is required. A return address must include the department/program number of the sender **as per [Transfer of Records Department Codes](#)**. (To ensure privacy, do not identify the sending department/program by name.)
4. The envelope/package must be marked **Private and Confidential: If Undeliverable, Do Not Open – Return to Sender**.

Types of Transport Approved by Central Health

Internal Transfer of Information between Central Health's Facilities

1. This service is offered by Central Health's internal courier for transfer of information between Central Health facilities on a scheduled basis.
2. Central Health's internal mail service is used for transfer of routine and single items of information where time sensitivity and security requirements are minimal.

Regular Canada Post

1. This service is used for transfer of routine and single items of information such as appointment information and general clinical information where time sensitivity is low.

Approved External Courier

1. This method of transfer is used for secure transfer of sensitive information where time sensitivity is high and confirmation of delivery is required through guaranteed and traceable direct delivery.
2. All individuals must complete the **Request for Courier Form (FRM MAT 001)** posted on Central Health's intranet, except where otherwise specified by department or program area. Refer to the Materials Management Department for Central Health's current approved courier services.
3. This method of transfer is used at the discretion of the sender and is subject to approval of the department/program due to associated cost of service.
4. The sending individual is responsible to obtain the waybill number for the courier package and is accountable to confirm the delivery of the information to the intended recipient.

DEFINITIONS

Business Information	<p>Information with respect to Central Health's business that is not publicly disclosed by the organization. Employees/affiliates may come in contact with such information that is not generally known to the public as they perform their duties. Examples include:</p> <ul style="list-style-type: none">• legal matters involving the organization that are not public knowledge;• financial information that is not available in Central Health's annual report;• contractual agreements with vendors, consultants, contractors and third parties (the confidentiality of this information may be written into the contract, e.g., non-disclosure of the cost of the service).• Information about intellectual property such as development of new technology and treatments or unpublished reports;• Information pertaining to Central Health's information technology access and security cameras.
Courier	<p>Scheduled service options that provide time-sensitive shipping needs and means for tracking information during transport and arrival to destination.</p>
External Mail	<p>The transport of materials, such as letters and packages, handled in an external postal system such as Canada Post.</p>
Internal Mail	<p>The transport of materials, such as letters and packages, handled within and among health care facilities/sites within Central Health by Central Health employees or other contracted courier.</p>
Personal Health Information	<p>Identifying information in oral or recorded form about an individual that relates to:</p> <ul style="list-style-type: none">• information concerning the physical or mental health of the individual, including information respecting the individual's health care status and history and the health history of the individual's family;• the provision of health care to the individual, including information respecting the person providing the health care;• the donation by an individual of a body part or any bodily substance, including information derived from the testing or examination of a body part or bodily substance;• registration information;

	<ul style="list-style-type: none"> • payments or eligibility for a health care program or service in respect of the individual, including eligibility for coverage under an insurance or payment arrangement with respect to health care; • an individual's entitlement to benefits under or participation in a health care program or service; • information about the individual that is collected in the course of, and is incidental to, the provision of a health care program or service or payment for a health care program or service; • a drug as defined in the Pharmacy Act, a health care aid, device, product, equipment or other item provided to an individual under a prescription or other authorization issued by a health care professional; or • the identity of a person's representative as defined in Section 7 of the <i>Personal Health Information Act</i>.
Personal Information	<p>Recorded information about an identifiable individual including:</p> <ul style="list-style-type: none"> • the individual's name, address or telephone number; • the individual's race, national or ethnic origin, colour or religious or political beliefs or associations; • the individual's age, sex, sexual orientation, marital status or family status; • an identifying number, symbol or other particular assigned to the individual; • the individual's fingerprints, blood type or inheritable characteristics; • information about the individual's health care status or history, including a physical or mental disability; • information about the individual's educational, financial, criminal or employment status or history; • the opinions of a person about the individual and the individual's personal views or opinions.
Record	<p>A record of the personal health information in any form and includes personal health information that is written, photographed, recorded or stored in any manner, but does not include a computer program or a mechanism that produces records on a storage medium.</p>
Security	<p>Technological, administrative and physical safeguards to ensure protection and integrity of confidential information.</p>

REFERENCES

Newfoundland and Labrador Personal Health Information Act, Provincial Policy Manual Version 1.2, February 2011

Province of Newfoundland and Labrador: *Personal Health Information Act*, SNL2008, c. P-7.01, s. 15

Central Lancashire National Health Service, Safe Haven Procedure – For Transfer of Confidential Patient Information
<http://www.centrallancashire.nhs.uk/Library/Documents/policies/safehavenprocedure.pdf>

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