



Personal Health Information

Administrative Procedure 5.110

Board Governance Policy Cross Reference: 1, 2, 3, 12, 13, 16

Legal Reference: Personal Health Information Act; Freedom of Information and Protection of Privacy Act; Manitoba Guidelines on the Retention & Disposition of School Division Records; Manitoba Pupil File Guidelines

Date Adopted: December, 2001

Date Amended:

1. Evergreen School Division will collect only necessary personal health information.
2. All personal health information maintained with Evergreen School Division is to be collected, used, disclosed, stored or destroyed in such a way as to ensure its security from unauthorized access.
3. Only those persons authorized by PHIA and Evergreen School Division are to have access to personal health information maintained by the Division. As required by PHIA, authorized personnel are those with a “need to know” or as defined in PHIA.
4. Personal health information is to be maintained in areas designated by school division administrators as locations secure from unauthorized access.
5. Removal of personal health information from secure designated areas may be authorized by administrators for good reason providing that the authorized person maintains the security of the information.
6. Personal health information in electronic form is to be maintained with password protection on computer hardware and removable electronic storage media is to be maintained in a secure location.
7. Evergreen School Division will develop procedures for:
 - a) recording successful and unsuccessful attempts to gain access to personal health information maintained in electronic form;
 - b) recording additions to, deletion or modification of personal health information maintained in electronic form;
 - c) ensuring that every transmission of personal health information is recorded; and
 - d) reviewing the electronic record to detect any security breaches.

8. Computer hardware or removable electronic storage media is to be cleansed of personal health information if being disposed of or used for another purpose.
9. Any security breaches involving personal health information are to be immediately reported:
 - a) to the school principal if the breach occurs at school. The Principal is then to inform the divisional Privacy Officer using the divisional "Incident Report" form (see Forms 10.0 section of this manual.)
 - b) to immediate supervisors if the breach is identified by a divisional employee. The immediate supervisor is then to inform the divisional Privacy Officer using the divisional "Incident Report" form
 - c) The Privacy Officer will investigate all security breaches and recommend corrective procedures to address security breaches
10. Reasonable precautions are to be taken to protect personal health information from fire, theft, vandalism, deterioration, accidental destruction or loss and other hazards.
11. Divisional administrators will determine the personal health information that each employee is authorized to access for "need to know" reasons.
12. Orientation and ongoing training is to be provided for divisional employees and school board trustees about PHIA legislation and divisional policies and procedures regarding personal health information. Agents of the school division (like students or volunteers) will be informed of personal health information policies if exposed to such information.
13. Each employee and school board trustee shall sign a pledge of confidentiality that includes an acknowledgement that he or she is bound by the personal health policy and procedures established by Evergreen School Division and is aware of the consequences of breaching them.
 - a) Consequences for breaching divisional policies or procedures regarding personal health information may range from recommendations for correction (in the case of minor breaches) to disciplinary action (for contravening divisional policy or procedure). Such disciplinary action will be determined by the Board of Evergreen School Division and, considering the severity of penalties for those found guilty of offences under PHIA legislation, may include dismissal as an employee of the division.
 - b) Agents of the school division (like students or volunteers) will be required to sign a pledge of confidentiality if exposed to personal health information.
 - c) *Pledge of Confidentiality* is found in Section 9: Forms.

14. Evergreen School Division shall conduct an audit of its security safeguards at least every two years and shall take steps to correct any deficiencies as soon as practicable.