Information Security for Contactors Policy Tool

# Document Purpose and Overview

Many clinics use contractors to perform duties in their clinics and it is important that contractors be clear of the expectation with respect to privacy and security in the clinic. This policy assists the clinic with outlining the privacy obligations of contractors.

# Instructions for use

The instructions below are meant to assist you with making this document your own and to fulfill your obligations under the Health Information Act. The document is created in a standard word document and can be edited to address the specific agreement needed:

* Please read the document carefully and ensure that all sections are relevant to your clinic and make adjustments as required.
* There are highlighted sections throughout the document to assist you in customizing your information. Please review these sections and make them specific to your clinic’s practice.
* The sections that are not highlighted are recommended to be part of your policy to support compliance with the Health Information Act. Please make sure you read and understand these sections.
* Please remove all instructions and highlighting as you fill out the relevant section and ensure that your clinic name is entered throughout the document including the header.
* This policy refers to privacy documents such as Non-Disclosure Agreement, Information Manager Agreement, and confidentiality agreements. These are all available on the [Alberta Medical Association’s website](https://www.albertadoctors.org/leaders-partners/clinic-patient-privacy/tools-and-resources).
* These policies currently have simple formatting and should be adapted to the clinic’s policy manual formatting.
* Determine the best way to communicate this policy with relevant team members and implement the policy.

# Privacy Training

The Alberta Medical Association offers privacy and security training to any Alberta community-based medical clinic. [Visit the AMA website today to learn more!](https://www.albertadoctors.org/leaders-partners/clinic-patient-privacy/privacy-training)

Policy: Information Security for Contractors

# Policy Details

Creation Date:DATE Revision Date:

Applies to: All Employees and Contractors

Approved by: LEAD CUSTODIAN

Purpose

Contractors performing a service for a clinic are subject to clinic privacy policies and procedures. Additional measures are needed to ensure that contractors are aware of and follow privacy policies.

Please review the policy items below carefully as these are recommended to ensure compliance with the Health Information Act.

# Policy

1. A vendor non-disclosure agreement (VNDA) or contract shall be completed and signed between the clinic and all third parties who may have non direct access to patient information (e.g., cleaning services)
2. An Information Manager Agreement (IMA) will be completed and signed between the practice and all third parties who may have access to systems and assets of the clinic in providing contracted service (e.g., practice management software, IT hardware services, etc.). This agreement will include specific information security provisions for the contractor or will bind the contractor to the clinic’s information security policies and procedures.
3. Contractors will be provided a copy of the clinic’s privacy and security policies and procedures and will sign a declaration that they have received these documents (please refer to the VNDA or IMA).
4. Any related third-party information security and privacy policies shall be made available to the clinic Privacy Officer upon request, including any updates or revisions that occur after execution of the contract.
5. All contractors and their employees who have exposure to and use clinic information assets and systems shall sign a confidentiality agreement. Third-party service providers shall remind their employees on termination of their continued responsibility to maintain the confidentiality of the clinic’s information.
6. Any real or suspected privacy breach must be reported to the clinic Privacy Officer as soon as practicable.
7. Agreements or contracts will include provisions for securely destroying or returning all practice information assets including hardware, system documentation and data upon termination of agreements and in accordance with contract provisions reflecting records retention and data management policy.

Questions?

If you have any questions about this policy, please contact the clinic’s Privacy Officer, NAME, EMAIL, PHONE.