DEVELOPING YOUR PRIVACY POLICY - WORKSHEET

This document outlines key questions that will help you to develop your clinic privacy and security policies and procedures. **Note:** This does not replace the need for full documentation. Please refer to the tips at the end of this document and resources and templates for additional guidance.

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| **Clinic Name:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | **Privacy Officer:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |
| **MOA(s): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** | **IT Support (if applicable):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |

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| **Policy / Section** | **Guiding Questions** | **Answers** |
| 0. Scope & Definitions | What is the name of your clinic and are any additional organizations covered by this policy? |  |
| What personal information does your clinic collect? |  |
| Are there any additional definitions or acronyms that you might want to refer to? |  |
| 1, Collecting Personal Information | For what purposes does your clinic collect personal information? |  |
| Do you only collect the personal information that you really need for the stated purposes? |  |
| How do you collect and store personal information? |  |
| 2. Consent | How will you obtain consent for collecting, using and disclosing personal information? i.e. Orally, in writing, electronically etc.) |  |
| What method will you use to allow patients to opt out or withdraw consent? |  |
| Under what circumstances will you disclose personal information without explicit consent (i.e. law enforcement, emergency, collecting debt etc.) |  |
| How is personal information disclosed to outside our organization and why? |  |
| 3. Using and Disclosing Personal Information | Who will use or have access to the personal information, and for what purposes? Are you limiting access on a need-to-know basis? |  |
| Is any information being shared or sold to 3rd parties? Or being used for marketing or promotional purposes? Please describe: |  |
| 4. Retaining Personal Information | How long do you retain the personal information in the clinic? Is information archived or securely destroyed? |  |
| 5. Ensuring Accuracy of Personal Information | How can patients request corrections and ensure that their information is updated and/or accurate? |  |
| What processes or timelines might be outlined in responding to requests/complaints? |  |
| 6. Securing Patient Information | What safeguards do you have in place to protect patient information? Where do you keep personal information and how is it secured? |  |
| When is it disposed of and how? Is it disposed of securely? |  |
| What happens to records when a physician leaves your practice or retires? |  |
| 7. Providing Patients Access to Personal Information | What is the process for requesting access to personal information? Are there any exceptions that may limit access (outlined in PIPA)? |  |
| Are there any fees or timelines involved with providing access to personal information? |  |
| 8. Questions and Complaints | What is the process for the Privacy Officer managing complaints, concerns and questions? |  |

**TIPS**

* Consider using the [Physician Privacy Toolkit](https://www.doctorsofbc.ca/managing-your-practice/practice-supports/privacy-toolkit) - [Privacy Policy Template](https://www.doctorsofbc.ca/sites/default/files/template_-_privacy_policy.docx) or ‘[Province of BC](https://www2.gov.bc.ca/gov/content/employment-business/business/managing-a-business/protect-personal-information/develop-policy) – [Personal Information Protection Policy Template (MS Word)](https://www2.gov.bc.ca/assets/gov/business/business-management/protecting-personal-information/personal-information-protection-template.doc) or as a starting point for developing your clinic’s Privacy
* Use the ‘Find & Replace’ function in MS Word to replace prompts like ‘Name of organization’ with your ‘Clinic Name’
* Once your draft is completed, review this with your Privacy Officer and management to ensure full alignment on the answers outlined above
* Consider having the final documentation reviewed by legal counsel or a privacy professional to ensure that it is aligned with Personal Information Protection Act (PIPA) and other related legislation.