



## RISE CHC Pharmacy Privacy Policy

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### Introduction

RISE CHC Pharmacy sits within Collingwood Neighborhood House Society (CNH). BC's *Personal Information Protection Act* (PIPA) sets out rules for how organizations collect, use and disclose personal information. This act applies to the information that RISE CHC Pharmacy collects about the patients who fill prescriptions here.

As a team, we foster a culture of privacy, and work in compliance with PIPA and the College of Pharmacists of BC (CPBC). RISE CHC Pharmacy and CNH are committed to being accountable for how we handle personal information, as well as how we follow the rules and procedures outlined in this policy.

### Purpose

The purpose of this document is to outline the RISE CHC Pharmacy Privacy Policy. It is to inform staff and patients about the privacy safety we have in place, as well as to support staff to meet and adhere to privacy requirements. The policy is available on our RISE CHC staff shared drive for our staff and by request for patients.

### Background

#### Types of information we are collecting:

As per PIPA, personal information means information about an identifiable individual including:

- Contact information: name, email, phone, address, gender, third-party insurance information
- Personal Health Number
- Medical History such as symptoms, clinical conditions, medications, test results or allergies

We will collect only the minimum amount of data required to provide safe dispensing of pharmaceutical products.

Who are we collecting personal information from?

People who present to RISE CHC Pharmacy at our main location.

What is the purpose of collecting the information and how will it be used?

We will only collect the information that is required to provide care, administrate the care that is provided, and communicate with patients.

Sensitivity of collected information

High sensitivity.

Where is personal information documented?

All information is documented and stored on our electronic medical record, OSCAR per RISE Community Health Centre's Privacy Policy or our pharmacy software, WinRx. WinRx is password protected, and stored and backed up to a secure, Canadian-based cloud daily managed by Mercury Technology Solutions. WinRx back-ups are encrypted.

Who has custody of the information?

Collingwood Neighborhood House Society has custody of the medical records.

**Consent to collect information**

By virtue of seeking care from RISE CHC Pharmacy, consent is implied (assumed) for personal information to be used by RISE CHC Pharmacy to provide care, dispense medications, provide clinical services, and to be shared with other providers involved in care.

Consent can be withdrawn at any time. If someone wishes to withdraw consent, we will inform the person that we would no longer be able to safely provide pharmacy-related care.

In circumstances such as research, where information is requested from an external party, we will obtain additional consent from each individual before sharing information. All patients have the right to refuse to participate in research and this will not affect their care with RISE CHC Pharmacy.

**Disclosing information**

Disclosure to other health care providers:

A patient's implied consent extends to RISE CHC Pharmacy sharing personal information with other providers involved directly in a patient's care, including (but not limited to) other nurse practitioners, physicians and specialists, pharmacists, lab technicians, dietitians, physiotherapists, nurses, social workers, counsellors, community health workers and occupational therapists both within and beyond RISE Community Health Centre. If there is any doubt regarding another provider's involvement in the patient's care, the patient will be contacted prior to releasing any personal information.

#### Disclosures authorized by law:

RISE CHC Pharmacy will only disclose personal information where authorized by PIPA or required by law (for example, in the event of a court order, subpoena, search warrant, or if we think a child or youth under 19 years of age is being abused or neglected).

There are limited situations where we are legally required to disclose personal information without your verbal or written consent. These situations include (but are not limited to) billing Pharmacare, provincial health plans, or billing your extended benefits.

#### **Patient Rights to Access Records**

- Patients have the right to access their record in a timely manner. A Patient may request a copy of their medication invoice for tax receipts by presenting to RISE CHC Pharmacy with government-issued ID. If the patient themselves cannot present, they may write a letter that authorizes another person, by name, to pick up their tax receipt instead. The letter must be signed and dated. The representative must bring their government-issued ID.
- Patients may request their PharmaNet record through RISE CHC Pharmacy by bringing government-issued ID that matches their current address. This record will show prescriptions dispensed in the past 14 months.
- Patients may view their PharmaNet record via Health Gateway <http://www.gov.bc.ca/healthgateway> This record will show prescriptions dating back to September 1, 1995.

#### **Retaining information**

We retain prescription records for a minimum period of five years, or as otherwise required by law and professional regulations.

When information is no longer required, it is destroyed in an irreversible and secure manner, in accordance with each health care professional's appropriate college and the *Health Professions Act* (and *Social Workers Act*) that govern the storage and destruction of personal information.

#### **Accuracy**

RISE CHC Pharmacy staff will work to ensure that the information we collect is as accurate and complete as possible. Individuals may request that RISE CHC Pharmacy correct any errors or omissions in their personal information that is under our control and a note will be made to reflect this on the file.

## **Safeguards**

Safeguards are in place to protect the security of personal information. These safeguards include a combination of physical, technological and administrative security measures that are appropriate to the sensitivity of the information. These safeguards are aimed at protecting personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

### Administrative

- Data is recorded in our pharmacy software. It is backed up every 24 hours.
- All information is stored in a Canadian cloud.
- Our pharmacy software access is by password login, with a unique User Name, Password, and must be updated every 3 months.
- The login details are provided in person to new users, with a unique username and generic password, and they are provided with instructions to immediately change their password and create a password known only to them.
- Users are not allowed to have their unique login to be used by anyone else.
- Students and other temporary users have an Expiry Date added to their logins, so that they are unable to access the pharmacy software after their scheduled shifts have concluded.
- RISE CHC Pharmacy staff who resign their position with us have their WinRx login de-activated immediately. If they are a registrant with the CPBC, they will be removed from the current RISE CHC Pharmacy staff list via eServices by the Pharmacy Manager.
- RISE CHC Pharmacy Staff will only access profiles for the provision of pharmaceutical-related care.
- Staff will automatically be logged out of WinRx after 15 minutes of inactivity.
- Any clinical discussions or conversations that involve personal information do not occur in a public area where others may overhear.

### Physical

- RISE Community Health Centre has locked doors and is alarmed. We contract with a security company to monitor our alarm, and contact police if the alarm is set off. RISE CHC Pharmacy is located inside RISE Community Health Centre, but has its own locked doors with access restricted to pharmacy staff and alarmed when no pharmacy staff is present.
- There is restricted access to our staff work spaces; only RISE CHC Pharmacy staff have access to this space. The RISE CHC Manager and Director also have access to the pharmacy for emergency purposes.
- Our spaces are set up to prevent snooping. For example, all computers are facing away from public spaces.

- Printers are located in a secure area that has no public access.
- We have secure paper shredding boxes, and a contract with a secure shredding company.

### Paper Pharmacy Records

The vast majority of RISE CHC Pharmacy records are electronic. When using paper pharmacy records:

- Staff are not permitted to remove pharmacy records from the pharmacy.
- All pharmacy records are also stored electronically. Once prescriptions, consent forms, or other documents are scanned into the pharmacy software, the paper version will be securely shredded by our contracted company.
- Duplicate prescriptions must be kept as hardcopies (faxed or originals) in the pharmacy for a period of five years. After five years, they will be securely shredded by our contracted company.

### Technological

- The RISE CHC Pharmacy back-ups are stored on our secure cloud, in a Canadian database managed by Mercury Technology solutions.
- Only computers located inside the RISE CHC Pharmacy have WinRx pharmacy software installed. Only the Pharmacy Manager/Clinical Pharmacist and Pharmacy Staff accounts have access to the WinRx pharmacy software on these computers.
- Access to WinRx requires login via the Pharmacy Manager or PharmacyStaff accounts, then a second login via the WinRx software
- All workstations are encrypted, and any communication between devices is encrypted, such as SSL/TLS (secure sockets layer/transport layer security), etc.
- SRFax, our secured faxing solution, is a PIPA/FIPPA compliant solution ([www.srfax.com](http://www.srfax.com))
- As a matter of process, when selecting solutions for pharmacy processes, the RISE CHC Pharmacy chooses FIPPA compliant options.

### Portable Devices

- RISE CHC Pharmacy staff are unable to access pharmacy information via their portable mobile or other devices. Staff must be on-site to access any pharmacy information from the designated RISE CHC Pharmacy computers.
- Wireless transfer of personal information or storage on cloud-based programs will also be protected by industry-standard encryption.

### Theft

- If a person were to steal the physical computers, they would not be able to access any medical information. All pharmacy computers are encrypted. WinRx back-up files are also encrypted. Access to the pharmacy software requires additional login credentials, which are different from

the computer account logins, providing a higher level of security for pharmaceutical-related information.

- The pharmacy is alarmed with motion sensors and secured locked gates when pharmacy staff are not present on-site. If pharmacy staff are stepping away from the pharmacy, the gates to the pharmacy are locked.
- If a device were to be stolen, RISE CHC Pharmacy would direct CNH's IT support to remotely wipe the device of all data if the device is connected to the internet.
- We work closely with our WinRx support service provider, Applied Robotics to maintain up-to-date versions of our pharmacy software to optimise security.

## **Communication**

RISE CHC is sensitive to the privacy of personal information and this is reflected in how we communicate with our patients, others involved in their care and all third parties.

We protect personal information regardless of the format. We use specific procedures to communicate personal information by telephone, fax, courier, or text as follows:

### Telephone

We take patient preference with regards to phone messages into consideration. Unless authorized, we only leave our pharmacy name and the patient's first name on messages for patients on voicemail.

### Fax

We use SRFax, our secured faxing solution, which is a PIPA/FIPPA compliant solution ([www.srfax.com](http://www.srfax.com)). We use E-Faxes, so faxes go directly to and from our WinRx Pharmacy Software

### Courier

When we send prescriptions by a dedicated prescription delivery courier, they are in a sealed bag and the company is provided specific details/instructions regarding delivery.

### Email

The RISE CHC Pharmacy generic email is not available to the public. It is only used for vendors and third-party billing companies for communication purposes and not for sharing medication/prescription information with patients.

If a RISE CHC Pharmacy patient who is also a RISE CHC patient wishes to share personal and/or medical information with the pharmacy, they will email [risereception@cnh.bc.ca](mailto:risereception@cnh.bc.ca) and the information will be forwarded to the Pharmacy Manager directly. RISE CHC Pharmacy will respond to the patient by phone or in-person only. RISE CHC Pharmacy will not provide communication via email.

## **Challenging Compliance**

Individuals can ask about our PIPA and/or CPBC compliance, and have a right to complain. Complaints can be made in writing or by phone. Written complaints should be sent to [feedback@cnh.bc.ca](mailto:feedback@cnh.bc.ca) or by calling the RISE CHC Pharmacy. The formal complaint form can be found at: <https://www.cnh.bc.ca/wp-content/uploads/2024/06/Non-Staff-Complaint-Procedure-Form.pdf>

Complaints should be to the attention of the RISE CHC Pharmacy Security Lead.

If an individual is not satisfied with how RISE CHC Pharmacy performs its duties under PIPA or CPBC, or wishes to seek a review of our response to their access or correction request, they can contact: The Office of the Information and Privacy Commissioner of British Columbia at [www.OPIC.BC.ca](http://www.OPIC.BC.ca), or by phone (250) 387-5629.

## **Protocol for Privacy Breach**

A privacy breach includes the loss of, unauthorized access to, or unauthorized collection, use, disclosure, or disposal of personal information.

### Step 1: Reporting

Any privacy breach should be reported immediately to the Security Lead. If the security lead is not available, her delegate (RISE CHC Director) will fill this role.

### Step 2: Contain

The Security Lead, Supervisor, and (designated) staff will take immediate steps to contain the breach, including seeking assistance from Information Technology (the systems team).

For example:

- Stop unauthorized practice
- Recover records
- Shut down the system that was breached
- Revoke or change computer access codes;
- Correct physical security weaknesses

The Security lead will keep the RISE CHC Manager, Director (who will inform the CNH Executive Director), Mercury and Applied Robotics Tech support apprised of any breaches and will liaise with the Information and Privacy Commissioners with respect to any public comments regarding a breach. The Security lead will document the breach and perform a risk evaluation.

### Step 3: Notification

Patients will be notified as soon as possible about the breach.

- Notification of affected patient will include:
  - Date of the breach
  - Description of the breach
  - Description of the personal information involved
  - Risk(s) to the patient
  - Steps taken to control or reduce the harm
  - Future steps planned to prevent further privacy breaches
  - Steps the patient can take to control or reduce the harm
  - Contact information of the Office of the Information and Privacy Commissioner for BC

#### Step 4: Security Safeguards and Prevention Strategies

The Security lead, RISE CHC Management team, or designated staff will determine whether any improvements or changes to security safeguards are needed as a result of the breach, including determining whether additional preventative measures are necessary.

#### **Privacy Management Program**

##### Internal Reporting structure

Any privacy concerns should be reported directly to the Security lead for RISE CHC Pharmacy. If not available, report to delegate (RISE CHC Director).

##### Privacy and Security Training

All RISE staff are responsible for meeting the legislated requirements for the collection, storage, use, and disclosure of personal and health information. Each health professional is regulated by their appropriate college and under the *Health Professions Act*.

All pharmacy staff must complete: The Privacy and Confidentiality e-learning module through the Provincial Health Services Authority Learning Hub.

##### Staff confidentiality agreement

- All RISE CHC staff (including Pharmacy staff) are contractually required to adhere to our privacy policy and confidentiality agreement.
- All RISE CHC Pharmacy staff are contractually required to adhere to the Confidentiality Undertaking agreement created by the CPBC.
- All staff sign the Undertaking of Confidentiality and Security Forms.

##### Ongoing Education and Program Development



The RISE CHC Security lead will provide ongoing advocating for privacy in our organization. This includes ongoing education and support for staff to maintain a high standard of privacy. Our privacy policy and program will be reviewed annually.

**Reviewed:** April 30, 2024

RISE Security lead: Joy Que – Pharmacy Manager & Clinical Pharmacist

RISE CHC Director, Sandra Bodenhamer