



Employee Privacy and Security Policy & Procedure Checklist Template



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ATTENTION: All practice managers, healthcare providers, clinic managers of private healthcare practices. This Practice Management Success Tip has been created especially for you!

EMPLOYEE PRIVACY AND SECURITY POLICY AND PROCEDURE CHECKLIST TEMPLATE

In our healthcare practices we have policies and procedures to identify the reasonable safeguards we will take to protect personal and health information entrusted to us. But policies and good intentions alone is not enough; we also need to take action to ensure our policies are understood and being followed.

Policies and procedures must be in writing, available to employees, and monitored to ensure that they are followed. Otherwise, you face all sorts of risks, including privacy breaches and other legal problems.

There is much excitement when we welcome a new hire to our team and many administrative tasks need to take place to get this individual up and running. To ensure that onboarding a new employee is a smooth transition, it is imperative to follow a practical checklist procedure. A systematic approach to welcoming a custodian or employee will guarantee that valuable privacy and security training is completed.

There are also many other managerial benefits to adopting this high-quality process

- ✓ Better job performance and satisfaction
- ✓ Greater commitment to protecting privacy and security
- ✓ Reduced stress and better staff retention

This Practice Management Success Tip Will Help You

- Guide discussions about the importance of ensuring privacy and security best practices are understood and followed.
- Include your new employee in every day actionable steps that contribute to protect health information, our people, and our assets.
- Conduct regular annual reviews (e.g. employee performance review) to refresh your team's privacy and security training and monitor for success.
- Manage the employee transfer / exit processes which includes modifying accesses to personal information, and return clinic assets.
- Document your compliance to protect patient privacy as required by sections 60 and 63 of the *Health Information Act* (HIA), and section 8 of the Health Information Regulation, and your professional college standards of practice.

WHAT TO DO NEXT

Prepare

- Review your existing employee orientation procedures and your privacy and security risk assessment to identify administrative, technical, and physical safeguards to be trained to all employees.

Customize The Template

Using the policy and procedure template in this package

- Draft the policy and procedure with your specific privacy and security training requirements.

Activity

- Discuss the draft policy and procedure with your custodian(s), privacy officer, and clinic manager.
- Receive authorization from your clinic manager, owner, or director, custodian, and privacy officer to implement the procedure.
- Introduce the procedure by reviewing the checklist process with your current employees and custodians. Require each current team member completes the checklist for themselves and submit it to your privacy officer for review. The completed checklists are maintained on the employee's personnel file.

Train The Staff

- Share the procedure with your team who will be involved in the onboarding of new hires and transferring / exiting of existing employees.
- Explain that the goal of the checklist process is to ensure privacy and security best practices are understood and followed, as well as proper role based accesses are granted to help them do their jobs.

Implement, Monitor, Review and Revise

- Implement the checklist with each new hire.
- Review the privacy and security checklist with each employee at their annual performance review.
- Review the privacy and security checklist when an employee changes roles in your practice or leaves the practice to ensure appropriate accesses are modified and / or terminated as needed.
- Monitor and provide timely feedback on both the checklist process and results of its use.
- Identify any opportunities for improvement to the policy or procedure.
- Revise the procedure as necessary. Use the 'version control' to document your revisions.

Example That You Can Use

Watch the [YouTube video](#) or listen to the [Practice Management Nuggets podcast](#) for an example of how to use this template.

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This procedure template is part of the Practice Management Success © series. August 2019.

This publication provides general guidance for healthcare practices in Alberta. It is expected that you will review and refine these documents to meet your needs. For additional assistance, please contact

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Your Practical Privacy Coach and Practice Management Mentor

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Contents

Why Do You Need Employee Onboarding And Exiting Checklists?	6
Employee Privacy and Security Checklist.....	6
New Employee Orientation / Onboarding.....	6
Existing Employees / Annual Review.....	6
Transferring / Exiting Employees	7
Custodian Responsibility	7
Policy # : Employee Privacy And Security Checklist.....	9
Procedure # : Privacy And Security Employee Checklist.....	11
New Employee Orientation / Onboarding.....	11
Annual Review	11
Transferring / Exiting Employees	12
Sample Form	13
Employee Privacy and Security Checklist	13
About Jean L. Eaton	15
Follow Jean L. Eaton Online!.....	15
About Practice Management Success.....	15

WHY DO YOU NEED EMPLOYEE ONBOARDING AND EXITING CHECKLISTS?

There is much excitement when we welcome a new hire to our team and many administrative tasks need to take place to get this individual up and running.

Policies and procedures must be in writing, available to employees, and monitored to ensure that they are followed to protect patient privacy as required by our professional colleges and privacy legislation. Otherwise, you face all sorts of risks, including privacy breaches and other legal problems.

To ensure that onboarding a new employee is a smooth transition, it is imperative to follow a practical checklist procedure to make sure no important steps are missed. There are also many other managerial benefits to adopting this high-quality process

- ✓ Better job performance and satisfaction
- ✓ Greater commitment to protecting privacy in the organization
- ✓ Reduced stress and better staff retention

Employee Privacy and Security Checklist

Policies and procedures is a reasonable safeguard to protect the personal and health information entrusted to us. But policies and good intentions alone is not enough; we also need to take action to ensure our policies are understood and being followed by all our employees.

Training new and existing staff on privacy and security best practices is instrumental in making your healthcare practice a success and maintaining its fine reputation. Following a systematic approach to welcoming a new employee, transitioning an existing employee into a new position, or offboarding an employee who is exiting will guarantee that valuable privacy and security training and accesses are completed.

Read this **Privacy Breach Nugget** that explains what can happen if you don't have these good practices in place. [Do You Know Where Your Policies And Procedures Are? https://informationmanagers.ca/do-you-know-where-your-policies-and-procedures-are/](https://informationmanagers.ca/do-you-know-where-your-policies-and-procedures-are/)

New Employee Orientation / Onboarding

New employees are a welcome addition to any team and there is a vast amount of training that needs to take place from general procedures on how to handle phone calls to signing confidentiality oaths to becoming familiar with all policies and procedures, in addition to learning the everyday job duties for their own position.

Since privacy is good for business, we do not want to miss any important opportunities to train our new staff on privacy and security best practices. Using the Employee Privacy and Security Checklist will help facilitate training discussions and document the authorized accesses of each employee.

Existing Employees / Annual Review

The checklist will also act as a tool for each employee at their performance review. Provide positive feedback and observations of an employee's successes in protecting personal information. Discuss opportunities for improvement, too. This is also a good time to review an employee's current authorized role based accesses and determine if any changes to match the employee's current job duties is needed.

Ensure that the employee still has 'tokens' that they were given at the time of their hire, like identity badge, keys to the clinic or Alberta Netcare RSA fob.

Privacy and security best practice dictate that confidentiality oaths should be signed on an annual basis and annual privacy awareness and security refresher training should also be provided to all employees. In the event of a privacy incident or breach, it is imperative that a healthcare practice can prove by their documentation that regular privacy and security training is provided to their staff.

Transferring / Exiting Employees

When an employee transitions into a new role or is terminated, review, and update the privacy and security checklist to ensure that access and permissions are appropriately modified or terminated.

Custodian Responsibility

Custodians have an obligation to ensure reasonable safeguards to protect the privacy and security of health information. This includes having appropriate policies and procedures in place, as well as demonstrating and documenting that you have implemented your plans. This is a requirement of professional college standards of practice and privacy legislation like the *Health Information Act* (HIA).

See the article [Do You Know Where Your Policies And Procedures Are?](https://informationmanagers.ca/do-you-know-where-your-policies-and-procedures-are/) to learn what can happen to you if you don't have your employee training process well documented. <https://informationmanagers.ca/do-you-know-where-your-policies-and-procedures-are/>

The Employee Privacy and Security Checklist will make it easy for you to ensure your new hires, existing employees, and transferring or exiting employees are privacy and security compliant.

In the next section, you will find the policy and procedure template for the Employee Privacy and Security Checklist. I recommend that you use 'Review Privacy and Security Employee Checklist' as one of the topics for your monthly meetings.

This publication provides general guidance for healthcare practices in Alberta. It is expected that you will review and refine these documents to meet your needs. For additional assistance, please contact Information Managers Ltd.

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Instructions On How To Customize The Policy, Procedure, And The Form

1. Use this document as a template for your practice.
2. To prevent over-writing this template, 'SAVE AS' this document and re-name it to your working file folder. For example: Privacy and Security Employee Checklist_V1
3. Customize the form to best reflect practice. Add new items and delete sections from the sample where necessary.
4. Replace the names in ALL CAPITALS with your names.
5. Delete these instructions.
6. Add your letterhead to the forms.

POLICY # : EMPLOYEE PRIVACY AND SECURITY CHECKLIST

Start Date:

Revision Date:

Approved By:

Date:

Purpose: Ensure that employees and health care providers are aware of and adhere to administrative, technical, physical safeguards, and risk in respect of privacy and security of health information.

Authorize appropriate role-based access to clinic assets.

Comply with professional college standards of practice and legislative requirements.

Policy Applies to: All employees and healthcare providers.

Employee orientation / on-boarding; changing positions; and exiting / leaving the clinic.

Process Responsibility: Supervisor, Clinic Manager, or Privacy Officer

Other related policies and procedures

Principles

Custodians have an obligation to ensure reasonable safeguards are in place to protect the privacy and security of health information entrusted to them. This includes having written policies and procedures, and documentation compliance. These privacy and security best practices is instrumental in making the healthcare practice a success and maintaining its fine reputation.

This means having appropriate policies and procedures in place, as well as demonstrating and documenting that you have implemented your plans. This is a requirement of professional college standards of practice and as required by sections 60 and 63 of the *Health Information Act* (HIA), and section 8 of the Health Information Regulation.

See the article [Do You Know Where Your Policies And Procedures Are?](https://informationmanagers.ca/do-you-know-where-your-policies-and-procedures-are/) to learn what can happen to you if you don't have your employee training process well documented. <https://informationmanagers.ca/do-you-know-where-your-policies-and-procedures-are/>

CLINIC NAME commits to ensure consistent and appropriate privacy and security training of new and existing employees and healthcare providers.

When employees transition into a new position at CLINIC NAME, a timely review of authorized accesses to personal information and clinic assets assures that employees have the appropriate tools to be successful in their new role.

When employees leave CLINIC NAME, end-dating or revoking of access to personal information and the return of clinic assets limits the risk of unauthorized access or use of PHI, and other clinic assets.

Completed checklists demonstrate the clinic's compliance to our privacy practices.

Version Control

Date	Version	Author of changes	Description

PROCEDURE # : EMPLOYEE PRIVACY AND SECURITY CHECKLIST

Start Date:

Revision Date:

Approved By:

Date:

Purpose: The clinic will maintain documentation for each employee that has received access control items (including identification badges, keys, access cards, fobs, security tokens, perimeter security alarm passwords, computer system passwords, etc.) and ensure that it has been returned, cancelled, or deleted at the termination of employment.

In the event of a privacy incident or breach, it is imperative that a healthcare practice can prove by their documentation that regular privacy and security training has been provided to their staff.

Prerequisite: Employee orientation / on-boarding

Performed by: Supervisor, Clinic Manager, or Privacy Officer

Materials Needed: New Employees:
Blank Employee Confidentiality and Security Checklist Form

Existing Employees:
Employee annual performance review, previous employee checklist

Start: When the clinic hires a new employee, annual performance review, transferring / exiting employees.

New Employee Orientation / Onboarding

1. When the clinic hires a new employee, the supervisor, clinic manager, or privacy officer will print the Employee Privacy and Security Checklist Template and add this to the employee's personnel file.
2. The staff member responsible for training and the employee will initial each of the applicable areas as they are completed.
3. Forward the completed Employee Privacy and Security Checklist to the privacy officer for review.
4. The privacy officer will file Employee Privacy and Security Checklist in the employee's personnel file to be maintained for the duration of the employees' employment.

Annual Review

5. On an annual basis with each employee at their performance review or on the anniversary of their hire date, the supervisor, clinic manager, or privacy officer will review the employee's previous Employee Privacy and Security Checklist.
6. Add any in services or training that the employee attended since the last review period.
7. Positive feedback can be given on observations of an employee's successes in protecting personal information and any opportunities for improvement will be discussed.

8. Review the employee's current authorized accesses and modify as necessary to match the employee's current job duties.
 - a. Remember, confidentiality oaths should be signed on an annual basis, as well as privacy awareness refresher training.

Transferring / Exiting Employees

9. When an employee transitions into a new role or is terminated, the supervisor, clinic manager, or privacy officer will review the Employee Privacy and Security Checklist to ensure appropriate accesses are modified and / or terminated as needed.

Version Control

Date	Version	Author of changes	Description

SAMPLE FORM

[Add your letterhead here]

EMPLOYEE PRIVACY AND SECURITY CHECKLIST

Dr. LAST NAME authorizes in writing user accounts.

Employee Name: _____

Employee Role /
Position: _____

The staff member responsible for training and the employee will initial each of the applicable areas as they are completed.

Item	Date Given	Initials	Date Returned	Initials	Comments
Oath of Confidentiality (renew annually).					
Receive "Employee Manual" and review with Business Manager or Clinic Manager.					
Review "Health Information Privacy and Security Manual Policies and Procedures" Discuss with Privacy Officer.					
Review operational policies and procedures with training partner / supervisor					
Privacy awareness training with Information Managers https://www.InformationManagers.ca/privacy-awareness-corridor or _____					
Patient Centered Clinic Training https://InformationManagers.ca/likes-EAC					
Cyber Security Awareness training					
Phone Rapport Training					
Role-specific instructions with training partner / supervisor.					
Main clinic door key.					
Other keys (specify).					
Perimeter Security Access Code.					
Clinic's self-learning Netcare Training Package immediately prior to receiving Netcare Access Fob.					

Item	Date Given	Initials	Date Returned	Initials	Comments
Netcare Access FOB. Serial #					
Network Computer System User Account.					
Billing User Account.					

In-Services Attended / Training Attended

Date	Topic	Presented by	Duration

ABOUT JEAN L. EATON

When we know better, we can do better...

Jean Eaton is constructively obsessive about privacy and confidentiality in the healthcare sector – and I think you should be too!

I assist healthcare providers, clinic managers, practice managers, privacy officers, and independent healthcare practice owners with practical privacy awareness training and tools that are easy to implement, consistent content, cost-effective, and meaningful to your day-to-day business.

If you would like to discuss how I can help your practice, just send me an email. I am here to help you.



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