

Policy and Procedure

Title:	Disposal of Confidential Material, Including Personal Health Information <i>(Formerly Disposal of Confidential Material – MacCharles)</i>
Policy Number:	06.015
Effective Date:	January 3, 1995
Revised Date:	March 14, 2019
Approving Body:	President and CEO
Authority:	CancerCare Manitoba Act
Responsible Officer:	President and CEO
Delegate:	Director, Cancer Clinical Information Management and Privacy Officer
Contact:	Cancer Clinical Information Management and CCMB Privacy Officer
Applicable to:	CCMB Staff and Physicians

1.0 **BACKGROUND:**
Not Applicable

2.0 **PURPOSE:**

- 2.1 To safeguard confidentiality during the disposal process of Confidential Material that has met the applicable retention criteria and is eligible for disposal/destruction.
- 2.2 To establish a consistent process for the disposal/destruction of Confidential Material (paper and non-paper) at CancerCare Manitoba (CCMB).
- 2.3 To dispose of or destroy Personal Health Information in accordance with *The Personal Health Information Act (Manitoba)* (“PHIA”).

3.0 **DEFINITIONS:**

3.1 **Confidential Material** falls into three categories:

- 3.1.1 **Personal Health Information:**
recorded information about an identifiable individual/patient that relates to:
 - a. The individual’s health, or health care history, including genetic information about the individual;
 - b. The provision of health care to the individual; or
 - c. Payment for health care provided to the individual;
and includes:
 - d. The PHIN and any other identifying number, symbol or particular assigned to an individual; and
 - e. Any identifying information about the individual that is collected in the course of, and is incidental to, the provision of health care or payment for health care.

Traditionally, Personal Health Information has been housed in the Facility Medical Record, but may also be held in any type of file, document or report and may be in any type of medium (e.g. paper, electronic format, microfilm, graphic, and audio) in any department, division, program or

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service.

3.1.2 Corporate Information includes:

- a. Any information recorded regarding an employee's salary, work history or work performance except as released by CCMB or to comply with the Public Sector Compensation Disclosure Act; or
- b. Any information recorded regarding an employee such as medical history, attendance at Employee Assistance Program, home conditions, financial situation, demographics including home address and home telephone number, domestic difficulties or any other private matters which have been recorded by staff in the course of business; or
- c. Any recorded information including statistical or financial information regarding the Facility which has not been authorized for release by the CCMB Executive Office.

3.1.3 Other Confidential Information includes:

- a. Any information marked "Confidential"; or
- b. Any information inserted, for disposal, into confidential waste receptacles.

4.0 POLICY:

- 4.1 All Confidential Material shall be disposed of by supervised incineration, shredding, or other approved method.
- 4.2 Proper controls shall be developed and implemented in work units of all departments, divisions, programs, and services to segregate Confidential Material (paper and non-paper) from non-confidential and other waste streams.
- 4.3 The pick-up and disposal through incineration, shredding, or other approved method of disposal of pre-sorted Confidential Material (paper and non-paper) is the responsibility of the host hospital at the CCMB sites as follows:
 - a. CCMB MacCharles site – HSC Supply and Distribution Service (204-787-1894);
 - b. CCMB St. Boniface site – St. Boniface Hospital Housekeeping Department (204-237-2172);
 - c. CCMB Prevention & Screening Programs and the Breast Cancer Centre of Hope – Misericordia Health Centre Housekeeping Department (204-788-8274);
 - d. Western Manitoba Cancer Centre (WMCC) – Brandon Regional Health Centre Housekeeping Department (204-578-4830).
 - e. SMD – Phoenix (204-222-5096).
 - f. Victoria General Hospital – Housekeeping Department (204-477-3344)
 - g. Concordia General Hospital – Housekeeping Department (204-661-7427)

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- h. Grace Hospital – Housekeeping Department (204-837-0198)
- i. Seven Oaks General Hospital Department (204-638-3184)

5.0 PROCEDURE:

- 5.1 Staff in departments, divisions, services and programs shall process Confidential Material as follows:
 - 5.1.1 Pre-sort by placing in designated containers. Package securely for pick-up and/or storage until incineration or shredding.
 - 5.1.2 Clearly identify and label as “Confidential Waste”. Containers shall not be loaded to the point where the container will rip or tear, or be unmanageable due to weight.
 - 5.1.3 Direct any questions regarding confidential material segregation and/or identification to the host hospital responsible for pick-up and disposal as indicated in 4.3.
- 5.2 Departments requiring new, additional, or a change to confidential waste collection services may arrange this by calling the host hospital responsible for pick-up and disposal as indicated in 4.3.
- 5.3 Confidential Material shall be picked up in a locked cart where possible, transporting it to a secure area. Confidential Material shall be kept under secure conditions after pick-up and while awaiting incineration or shredding.

6.0 REFERENCES:

- 6.1 WRHA – Disposal of Confidential Material, Including Personal Health Information, Policy No. 10.40.090.
- 6.2 HSC – Disposal of Confidential Material, Including Personal Health Information, Policy No. 40.80.20.

Policy Contact:	
All enquiries relating to this policy should be directed to:	
Name:	
Title/Position:	Director, Cancer Clinical Information Management and Privacy Officer
Phone:	204-792-2535
E-mail:	
Address: (if required):	

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DOCUMENTATION

Policy Location:

This policy is located (hard and e-copy formats):

1. The original signed and approved policy is on file in the Executive Office, CCMB
2. The e-copy is on file in the CCMB Governing Documents Library, SharePoint
- 3.

Revision History:

Date	Version	Status	Author	Summary of Changes
dd/mm/yyyy	#	Initial, Draft Final Minor/Major revision		
03/01/1995	1	Initial		
19/10/2011	2	Revision		
10/06/2015	3	Minor Revision	L Costa Policy Team	Policy revised to align with WRHA policy. Policy renamed to reflect all CCMB sites.
29/03/2018	3	Minor revision	S.Friedenberger	Reformatted to new template
14/03/2019	4	Minor revision	C. Slusky	Updated Oncology Sites and Direct and Dept. name

Approvals Record:

This Policy requires approval by:

Approval	Date	Name / Title	Signature
		Not required.	

FINAL APPROVAL:

Date	Name / Title	Signature
14/03/2019	Dr. S. Navaratnam President and CEO, CCMB	<i>Original signed by Dr. S. Navaratnam</i>