

Policy and Procedure

Title:	Disposal of Confidential Material, Including Personal Health Information	
Policy Number:	06.015	SECTION: Information Management
Effective Date:	January 3, 1995	
Revised Date:	September 14, 2023	
Approving Body:	President and Chief Executive Officer of CancerCare Manitoba (CCMB)	
Authority:	<i>The Health System Governance and Accountability Act (Manitoba)</i>	
Responsible Officer:	President and CEO	
Delegate:	CCMB Privacy Officer	
Contact:	CCMB Privacy Officer	
Applicable to:	CCMB Staff and Physicians	

1.0 BACKGROUND:

- 1.1** The Regulations to *The Personal Health Information Regulation Act* (Manitoba) requires trustees to establish and comply with written policies and procedures containing provisions for the security of personal health information during its collection, use, disclosure, storage, and destruction.

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") and *The Freedom of Information and Protection of Privacy Act (FIPPA)*.

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:

- The individual's health, or health care history, including genetic information about the individual;
- The provision of health care to the individual; or
- Payment for health care provided to the individual; and includes:
- The personal health information number (PHIN) and any other identifying number, symbol or particular assigned to an individual; and
- Any identifying information about the individual that is collected in the course of, and is incidental to, the provision of health care or

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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 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* (Manitoba); 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 – Shred-it (1-855-497-4733);
 - 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);

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- d. Western Manitoba Cancer Centre (WMCC) – Brandon Regional Health Centre Housekeeping Department (204-578-4830).

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** Place in the large confidential shredding bins or 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 Section 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 Section 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** Shared Health – Disposal of Confidential Material, Including Personal Health Information, Policy No. 310.140.107:
[310.140.107 - Disposal of Confidential Information Material, Including Personal Health Information \(sharedhealthmb.ca\)](https://www.sharedhealthmb.ca/310.140.107-Disposal-of-Confidential-Information-Material-Including-Personal-Health-Information)
- 6.2** CCMB Policy – Retention and Destruction of Health Records 06.008 [Retention and Destruction of Health Records.pdf](#)
- 6.3** CCMB Policy – Retention of Non-Medical Records 06.013 [Retention of Non-Medical Records.pdf](#)
- 6.4** *The Personal Health Information Act* (Manitoba)
<https://web2.gov.mb.ca/laws/statutes/ccsm/p033-5.php?lang=en>
- 6.5** *The Freedom of Information and Protection of Privacy Act* (Manitoba)
<https://www.gov.mb.ca/fippa/index.html>

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Documentation:

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| 1. | The original signed and approved document is on file in the Policy Office, CCMB. |
| 2. | The e-copy is on file in the CCMB Governing Documents Library on SharePoint. |

Revision History:

Date	Version	Status	Author	Summary of Changes
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
21/08/2023	3	Minor Revisions	C Slusky	Updated designate, contact and Shredding information

Executive Sponsor: This Policy was approved/endorsed by:

Date	Name / Title
September 14, 2023	Brent Gibson, Chief of Corporate Services and Finance

Approved by:

Date	Name / Title	Signature
September 14, 2023	Dr. Sri Navaratnam, President and Chief Executive Officer, CancerCare Manitoba	<i>"Original signed by Dr. Sri Navaratnam"</i>