



<b>MANUAL: CORPORATE</b>		Section: ADMIN	Number: xxxxxxxx
Subject: Virtual Care Privacy Policy		Date: 08-15-2021	
Supersedes:	Cross Reference: Digital Policy, HFHT Privacy Policy, Privacy Safeguard Policy		Issuing Authority: <b>Board of Directors</b>
<input checked="" type="checkbox"/> James Street (HFHT Corporate Office)	<input checked="" type="checkbox"/> All HFHT Clinical Sites		Pages xxxx

**Preamble:**

This policy is applicable to all clinical services within the Hamilton Family Health Team.

**Purpose:**

Virtual care is a pillar of Ontario's *Digital First for Health Strategy* and provides patients with low-barrier access to their health care team and allows providers to enhance their practice and accommodate patient needs.

Virtual care provided through a virtual visit is an electronic exchange of information via telephone, videoconferencing, secure messaging, or other digital tools, where one or more health care provider delivers health care services to a patient. Virtual care services may include telemonitoring and digital self-care tools that collect biometric data and support virtual visits.

**Policy:**

All HFHT health care providers are expected to offer patients, when clinically appropriate, opportunities to access to a virtual visit.

Providers can access virtual visit tools from the Electronic Medical Record (EMR) or through stand-alone virtual visit applications from their computer and/or mobile device. Only Personal Health Information Protection Act (PHIPA)-compliant platforms are approved for use within the HFHT.

Providers should not use personal emails, unencrypted text messaging, or free cloud-based videoconferencing platforms to communicate with patients. Providers should only use secure email, messaging, and videoconferencing accounts.

Providers should never publicly disclose virtual meeting identifiers (e.g., meeting ID number) on social media or with non-relevant parties and should ensure this information is secure.



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Prior to a virtual visit, providers should:

- Address accessibility concerns, if any, regarding captioning or screen readers and remind patients of steps that they can take to protect their privacy, such as joining from a private location and using a secure internet connection;
- Join the virtual visit from a private and secure location – e.g. using a closed, quiet and private place with window coverings as required and ensuring a secure internet connection;
- Consider using headphones rather than a device speaker to prevent being overheard by others;
- Ensure screens are unable to be viewed by others.

During a virtual visit, providers should:

- Regularly check to ensure the meeting is secure from unauthorized participants;
- Not record the meeting or take photos unless it is necessary and the patient provides express consent. Providers may wish to remind patients not to record or take photos unless otherwise discussed;
- At the start of an initial visit:
  - Verify the identity of the patient. This may require comparing the patient's image with a photo on file or asking the patient to show or read their health card information;
  - Introduce yourself and any others who are present and ensure the patient consents to the presence of any additional individuals;
  - Inquire if anyone is accompanying the patient and confirm the consent of the patient;
  - Ensure the patient is in a safe and private environment;
  - Remind the patient that, if the virtual visit is being conducted via videoconferencing and the platform allows, that the patient can blur their background if they do not want the provider(s) to see more than is needed;



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- Use sufficiently high-quality sound and resolution to ensure you can collect information (including verbal and non-verbal cues) that is as accurate and complete as is necessary for the purpose of providing health care.

**Documentation:**

Providers should ensure they are making appropriate notes and documentation of all care provided virtually as they would an in-person visit. Providers should document patient consent and acknowledgement (e.g., consent to a virtual visit, consent to being recording, acknowledgement of being in a safe and secure location, other participants who are part of the appointment)

**Virtual care and remote care:**

Remote care is a form of virtual care provided from outside the practice. Virtual care can be provided from any safe, private, and secure location (e.g., remotely or in-practice).

Virtual care should be utilized rationally and prudently, as it allows for physical distancing and may protect the wellbeing of providers and patients (e.g., during global pandemics).

Special considerations should be made when providing virtual care remotely given the serious risk of loss or theft when transporting patient information. Patient information should only ever be removed from the practice and taken to a remote location by providers who have a real need to do so to carry out their duties. This applies to electronic files, paper copies, information on laptops and other mobile devices, etc.

Electronic files should only be remotely accessed through a secure server where it can be adequately protected. When patient information is saved on mobile devices there is an increased chance for loss, theft, or other privacy breaches. Therefore, this should only be done when absolutely necessary to carry out their job and if so, only on an encrypted mobile device (i.e., password protected USB).



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Where there is no choice but to take information off-site, patient information should be de-identified if possible. This may require more than the removal of the patient's name. For more information on safeguarding patient information during transportation, please refer to our Privacy Safeguard Policy.

**Strategy for Policy Implementation:**

Under direction of the HFHT Board of Directors, the Privacy Officer will report to the Board Quality Committee regarding the implementation of this policy.

**Policy Review:**

This Virtual Care Privacy Policy will be reviewed at least every two years.