

Policy:	Confidentiality		
Policy Owner:	Coordinator, CSTAR		
Department:	CSTAR		
Approval By:	Director, CSTAR	Approval Date:	November 22, 2018

Original Effective Date:	January 1, 2019	Reviewed Date:		Revised Date:	
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POLICY

Canadian Surgical Technologies & Advanced Robotics ([CSTAR](#)) has a legal and ethical responsibility to protect the privacy of learners, and those involved in the delivery of courses and ensure that [confidentiality](#) is maintained.

CSTAR considers the following types of information to be confidential:

- The performance of peers and other health professionals the participant may observe while training at CSTAR.
- The content of simulation sessions and training scenarios as directed by the instructor.
- Confidential business information of the organization.

This policy applies whether the information is verbal, written, electronic, or in any other format.

Staff/affiliates must abide by the organization's standards of confidentiality. (Refer to the Confidentiality Policy). The organization also expects staff/affiliates to keep information which they may learn, or have access to because of their participation in events at CSTAR, in the strictest confidence.

PROCEDURE

1. Confidentiality Agreement

- 1.1. All staff/affiliates must sign/acknowledge the terms of the Learner Contract ([Appendix A](#)) prior to participating in a course or assessment at CSTAR.
- 1.2. Individuals playing the role of Standardized Patients, who are not affiliated with an Educational Institution, must sign the CSTAR Confidentiality Agreement ([Appendix B](#)) prior to participating in a course or assessment at CSTAR.
- 1.3. A record of your signed/acknowledged Confidentiality Agreement is retained by CSTAR for a period of seven (7) years after the related program has been completed. Documentation for contract workers and vendors will also be retained by CSTAR.

2. Investigating Alleged Breaches of Confidentiality

- 2.1. It is the responsibility of course organizers, in collaboration with CSTAR, to investigate alleged breaches of privacy and confidentiality. (Refer to Breach of Privacy Policy.)
- 2.2. Staff/affiliates should consult their leader, or the Coordinator CSTAR regarding privacy and confidentiality issues or concerns.

DEFINITIONS

Affiliates – Individuals who are not employed by the organization but perform specific tasks at or for the organization, including:

- Credentialed Professional Staff with a hospital appointment (e.g. physicians, midwives, dentists),
- Students,
- Volunteers,
- Contractors or contracted workers who may be members of a third party contract or under direct contract with the organization, and
- Individuals working at the organization but funded through an external source.

Confidential Business Information of the Organization – Information regarding the organization's business, which is not subject to public disclosure under the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#), including, but not limited to:

- Information exchanged in confidence with the Government of Ontario or another government or agency,
- Third party information as described in [FIPPA 1990, c. F. 31 s. 17\(1\)](#),
- Information provided in confidence to, or records prepared with the expectation of confidentiality by, a hospital committee to assess or evaluate the quality of health care and directly related programs and services provided by a hospital, if the assessment or evaluation is for the purpose of improving that care and the programs and services,
- Information exchanged with or provided to legal counsel in the process of seeking advice or legal opinion,
- Negotiations related to labour relation matters and settlements,
- Negotiations that give rise to employment or employment contracts,
- Legal matters that involve the organization that are not public knowledge,
- Plans relating to the management of personnel or the administration of an institution that have not yet been put into operation or made public,
- Information related to intellectual property held by the organization (e.g. information directly included in patents or other intellectual property applications, prior to publication of those patents or applications in public format),
- Information related to the organization's information technology security and access to systems, including,
- Information leading to improper access to the organization's computing resources, both internal and external to the hospital network (e.g. "guest" access to systems, remote access credentials),
- Hardware and software vendor names for products which may be vulnerable to external access attacks, or products that are part of our security infrastructure.

Confidentiality – The obligation upon an organization or person to protect information that has been entrusted to its care for a specific purpose and to ensure that information is only accessible to those authorized to have access.

REFERENCES

Legislation and Professional Standards

[Regulated Health Professional Act](#)

[Freedom of Information and Protection of Privacy Act](#)

[College of Nurses of Ontario, Standards of Practice – Confidentiality](#)

[College of Physicians and Surgeons of Ontario – Confidentiality and Access to Patient Information](#)

LHSC Corporate Policies

Confidentiality

Breach of Privacy

Records Retention and Disposition

APPENDICES

Appendix A – [CSTAR Learner Contract](#)

Appendix B - [CSTAR Confidentiality Agreement](#)