



SWEDISH

INFORMATION CONFIDENTIALITY AGREEMENT

Administrative Policy and Procedure	
Approved: December 2011	Next Review: December 2014
Department: All departments	
Population Covered:	All Swedish employees, medical staff, volunteers, students, contractors, vendors, or other authorized individuals with access to Swedish confidential information, if indicated.

Purpose

To ensure a consistent process for the signing and retention of the Swedish [Information Confidentiality Agreement](#) by all individuals having access to Swedish confidential information.

Policy Statement

All individuals who access to Swedish confidential information are instructed on the importance of confidentiality. Employees and volunteers are required to sign an [Information Confidentiality Agreement](#) at start of employment or service, acknowledging they understand and will adhere to this policy. Medical staff members are required to sign an [Information Confidentiality Agreement](#) at the time of appointment and reappointment, acknowledging they understand and will adhere to this policy. Contractual parties are required to sign an [Information Confidentiality Agreement](#) at the initial start of their contractual relationship with Swedish, acknowledging that they understand and will adhere to this policy.

Responsible Persons

All Swedish employees, medical staff, volunteers, students, contractors, vendors, or other authorized individuals with access to Swedish confidential information, if indicated, are responsible for signing an [Information Confidentiality Agreement](#). See procedure, below, for individual department responsibilities.

Prerequisite Information

Paper copies of the [Information Confidentiality Agreement](#) (Form 38438) are available from Human Resources and Medical Staff Services. An electronic version of the form may also be accessed and printed from Swedish Online. See procedure, below, for where to file signed copies of the [Information Confidentiality Agreement](#).

PROCEDURE

1. All those asked to sign the [Information Confidentiality Agreement](#) should first read the document.
2. Employees sign the *Information Confidentiality Agreement* during the hiring process. Human Resources files the signed original agreement in the employee's official personnel file. An additional copy of the *Information Confidentiality Agreement* is provided to each person for their reference.
3. Medical Staff sign the *Information Confidentiality Agreement* at time of appointment. Medical Staff Services files the signed original agreement in the medical staff member's credentialing file. An additional copy of the *Information Confidentiality Agreement* is provided to each person for their reference.
4. Residents, students, fellows, and volunteers who have access to Swedish patient information and computer systems sign the *Information Confidentiality Agreement* during orientation to the program in which they are participating. The program coordinator will maintain the signed original agreement in the program files. An additional copy of the *Information Confidentiality Agreement* is provided to each person for their reference.
5. Contractors will normally have confidentiality clauses in their contract at the start of their contractual relationship with Swedish, acknowledging that they understand and will adhere to Swedish's confidentiality policies. Swedish may request individual contractors sign the *Information Confidentiality Agreement*, if deemed necessary by Swedish management. The department that has contracted the service files the signed original agreement as part of the contract documentation. An additional copy of the *Information Confidentiality Agreement* is provided to each person for their reference.

Definitions

Confidential information. Information that may include, but is not limited to:

- Patient information (medical records, conversations, demographic information, financial information)
- Employee information (salaries, employment and payroll records, unlisted phone numbers, health records)
- Swedish proprietary information (financial reports, production reports, report cards, reimbursement tables and contracted rates, strategic plans, internal reports, memos, contracts, peer review information, credit information, communications, computer programs, technology)
- Third party information (computer programs, vendor information, technology)

Protected Health Information (PHI). Individually identifiable information created or received by Swedish that relates to the past, present or future physical or mental health or condition of an individual; the provision of health care to an individual, or the past, present or future payment for the provision of health care to an individual. This includes information such as name, address, date of birth, admission, discharge or death, telephone number, fax number, electronic mail address, social security number, medical record number, health plan beneficiary number, account number, certificate/license numbers, vehicle identifiers and serial numbers, device identifiers and serial numbers, Web Universal Resource Locator (URL), Internet Protocol (IP) address number, biometric identifiers, including finger and voice prints, full face photographic and other comparable images, and any other unique identifying number, characteristic or code.

Forms

- ◆ [Information Confidentiality Agreement](#)

Supplemental Information

None.

Regulatory Requirement

The Joint Commission. IM.02.01.01, IM.02.01.03.

NIAHO Accreditation Requirements MR.4 – Confidentiality.

Health Information Portability & Accountability Act (1996). Privacy and Security Rule §164.

References

None.

STAKEHOLDERS

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