

## The VCH Privacy Undertaking and VCH’s Contracted Service Providers

As a leader in Community Care, VCH’s role is to ensure that measures are in place to protect the clients that use our services. Although the addition of new technologies to our healthcare system improves continuity of care and information storage, it also introduces greater potential for privacy breaches. It is within the contract managers’ responsibilities to ensure that the service providers with whom VCH contracts have a clear understanding of and are following the [VCH Privacy and Confidentiality Policy](#) to the best of their ability.



**In an effort to provide privacy education for contracted service providers with respect to protecting patient information, the Privacy Office in collaboration with the Commercial Initiatives Team is encouraging all service provider personnel to complete the online VCH Privacy and Confidentiality Undertaking.** By doing so, staff and clients involved in VCH’s Community care services can feel confident that the contracted service providers understand the details of the VCH Privacy and Confidentiality Policy and implement appropriate safeguards to protect client information.

### Frequently Asked Questions:

<p><b>How long does the Confidentiality Undertaking take to complete?</b></p>	<p>The <a href="#">VCH Privacy and Confidentiality Undertaking</a> should take less than 10 minutes to complete.</p>
<p><b>Who is responsible for monitoring service provider compliance?</b></p>	<p>The Privacy Schedule of the contract states that VCH may request the service provider to conduct specific ongoing training for its personnel regarding compliance with FIPPA and the Privacy Schedule. This is particularly important if service provider personnel have access to client personal information.</p> <p>Contract managers will be responsible for <i>reminding</i> service providers of this requirement annually, during any performance reviews or check-in meetings. Since this is not a primary compliance requirement outlined in the contract, contract managers will not be responsible for collecting any documentation.</p> <p>Service providers are encouraged to keep copies of the signed undertaking on file (either paper or electronic copies), as proof of completion.</p>

<b>Who needs to complete the VCH Privacy and Confidentiality Undertaking?</b>	Service provider personnel include any casual staff, volunteers and/or subcontractors who will be involved in the delivery and/or administration of the contracted services.
<b>How often does this have to be done by service providers?</b>	The <a href="#">VCH Privacy and Confidentiality Undertaking</a> is expected to be repeated by service provider personnel every two years. New hires should complete the Undertaking as part of their onboarding process with the service provider.
<b>How do service providers access VCH Privacy and Confidentiality Undertaking?</b>	<p>Follow the steps below:</p> <ul style="list-style-type: none"> <li>• Access the Privacy Undertaking on the Learning Hub by going to <a href="https://learninghub.phsa.ca/">https://learninghub.phsa.ca/</a> .</li> <li>• Create a Learning Hub Account using the "Affiliate/Contractor" option when prompted.</li> <li>• Search for course code #11990 or "VCH Privacy and Confidentiality" and click Register course to begin.</li> <li>• Upon completion, print a copy of the signed Privacy Undertaking form and keep a copy on file.</li> </ul> <p>For more privacy information, contact VCH Information Privacy Office at <a href="mailto:privacy@vch.ca">privacy@vch.ca</a> or call 604-875-5568.</p>

To further assist service providers in fulfilling this request and understanding their privacy requirements, CIT’s Compliance Coordinator is working with the VCH Community Privacy Advisor to create an interactive education workshop for contracted service providers. This education session will be created following an initial assessment to gauge the current state of service provider knowledge. Once we have a better understanding of gap areas, VCH Privacy will offer a series of workshops to the service providers to address any areas of need and improve privacy awareness. Moving forward, this assessment will provide assistance when onboarding new service providers and verifying that their protocols meet the requirements of VCH Privacy prior to accepting VCH clients. The pilot phase of this assessment and education workshop will begin in August 2018.

For any further questions regarding the development of this service provider privacy assessment or the [VCH Privacy and Confidentiality Undertaking](#), please contact the author.



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